Australian Chamber of Commerce and Industry

PRE-BUDGET SUBMISSION 2022-23

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WORKING FOR BUSINESS.
WORKING FOR AUSTRALIA
Telephone 02 6270 8000
Email info@australianchamber.com.au
Website www.australianchamber.com.au

CANBERRA OFFICE

Commerce House
Level 3, 24 Brisbane Avenue
Barton ACT 2600 PO BOX 6005
Kingston ACT 2604

MELBOURNE OFFICE

Level 2, 150 Collins Street
Melbourne VIC 3000

SYDNEY OFFICE

Level 15, 140 Arthur Street
North Sydney NSW 2060
Locked Bag 938
North Sydney NSW 2059

ABN 85 008 391 795

Disclaimers & Acknowledgements

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- Commit to long term, consistent funding for VET which delivers an additional 300,000 students annually to ensure the economy's skill needs are adequately met.
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    - A wage subsidy of 30% for 12 months for both trade apprenticeships as well as 2-year traineeships.
    - A wage subsidy of 30% for 6 months for one-year traineeships.
    - Incentives and mentoring support to apprentices to support retention
- Establish a National Apprenticeship Advisory Board.
- Fund a review of industry pathways to provide strong guidance to students undertaking VET in Schools and pre-apprenticeships.
- Fund Jobs and Skills Australia to undertake a biennial National Workforce Development Strategy.
- Funding, and potential co-funding, of micro-credentials to encourage the continual up-skilling of the workforce.

JOBS

Workforce Participation

- Adequate funding is required to ensure the enhanced servicing of the long term unemployed is able to function as intended.
- Implement a Training to Work program to fill the gap created by the abolition of PaTH and extend it to other cohorts on the jobactive caseload such as people with disability and mature age jobseekers.
- Reintegrate the public funded service for people with disability back into the core employment system.
- Deliver the election commitment to make childcare more accessible and affordable, with more options to assist parents to return to the workforce sooner.
- Extending the $4,000 income bank credit for aged pensioners beyond June 2023 at least into the next financial year while labour shortages are at a crisis. Ideally, this figure needs to reflect the opportunity to bring pensioners back into the workforce for 2 to 3 days per week

Enterprise Bargaining

- Support the implementation of legislated Paid Domestic Violence Leave through advisory, assistance and referral resources for employees and employers.
- Establish new program in the Department of Employment and Workplace Relations to actively promote workplace productivity and enterprise bargaining
- Fund bargaining coaches for employers and employees to promote bargaining and productivity improvement

- Provide additional resources for the Fair Work Ombudsman (FWO) to assume added responsibilities following the planned abolition of the ABCC
- Provide additional resources for the Fair Work Commission (FWC) to more actively support and facilitate enterprise bargaining

Skilled Migration

- Reduce the complexity of visa application processes and costs.
- Reduce the SAF Levy for temporary and permanent employer nominated visas by halving the training levy and improving the refund policy

Work Health and Safety

- Fund an independent review of the Intergovernmental Agreement for harmonised work health and safety laws in Australia, to achieve ongoing harmonisation and a commitment to best practice regulation.
- Reinstate funding for Safe Work Australia social partners

SMALL BUSINESS

Small Business Investment

- Continue to support investment by extending the Temporary Full Expensing measure beyond 2023.
- Make permanent the 20% tax deduction bonus for small businesses under the Technology Investment Boost and the Skills Training Boost to improve their digital capability and upskill their workforce

Regulation

- Increase investment in digital technologies like RegTech to reduce the compliance and administrative burden of regulation on businesses
- Work with states and territories to simplify and streamline regulation to avoid duplication and simplify process.
- Impose greater accountability on the cost recovery process for regulatory agencies and ensure incentives are in place to drive efficient regulation.

GROWTH

Large-scale Investment

- Introduce a broad-based investment allowance of 20% of the value of an asset purchased for larger-scale, longer-term investments in plant and machinery.

Infrastructure

- All proposed infrastructure investment should be independently assessed and undergo stringent cost-benefit analysis prior to commencement
- Greater focus on regional infrastructure as an enabler of decentralisation.
- Finance public infrastructure through the issuing of government securitised infrastructure bonds.

Commercialisation of R&D and innovation

- Foster the commercialisation of R&D and innovation in Australia through continued support for, and a broadening of, the patent box to all industry sectors
- Stimulate investment and assist businesses to commercialise R&D and innovation in Australia though low-interest loans and other financial assistance

Tax Reform

- Begin the process of comprehensive tax reform, including the GST, by placing tax reform as a standing item on the Council of Federal Financial Relations agenda.
- Extend the small business 25% corporate tax rate to cover all small to medium enterprises by increasing the base rate to a turnover of $250 million.
- Limit any increase in alcohol excise to within the RBA target range of 2% to 3% to prevent it from stoking inflation.
- Abolish the Luxury Car Tax (LCT) to stimulate car sales and improve environmental performance.
- Take a leadership role, working with the state and territory governments, to reduce the burden of payroll tax on business.
- Extend the grandfathering arrangement for the Offshore Banking Unit by a further 18-24 months to enable a comprehensive analysis and discussion to take place with users to assess its impact.

SUSTAINABILITY

Emissions Reduction and Energy

- Maintain and lower energy prices through a technology neutral approach to electricity generation and supply.
- Incentivise greater private R&D investment in developing technologies by reallocating CEFC and ARENA funding from now proven technologies of wind and solar to emerging technologies such as hydrogen and batteries.
- Work with state and territory governments to streamline energy policy, to avoid duplicating schemes in relation to energy efficiency, the costs of which are ultimately borne by all energy consumers

Disaster and Emergency Management

- Work with relevant industry and government stakeholders to co-design an Australian Centre for Disease Control (CDC).

Introduction

The October 2022 Budget comes at a crucial time.

Australia has weathered the COVID pandemic relatively well compared with other advanced economies, and it is important to recognise that the Australian economy remains robust. Yet the economy faces strong headwinds from the combined challenges of acute inflationary pressure and a severe labour and skills shortage.

The key to maintaining the strength of the economy, while addressing these challenges is lifting and sustaining higher productivity growth. But this has become increasingly difficult, with Australia's productivity growth over the past decade at its slowest pace in 60 years.

The new Labor Government faces a key challenge in keeping its election commitments while easing inflationary pressures and expanding the workforce.

Economic Activity

On the upside, the Australian economy exceeded expectations at the beginning of 2022, with GDP up 0.8% in the March quarter to record an increase of 3.3% for the year to March. This was despite the negative impact of the COVID omicron outbreak, continuing supply chain disruption, a spike in fuel prices following the Russian invasion of Ukraine, the Queensland and NSW flood and east coast energy crisis. While most of these challenges persist, all indicators suggest that the economy will continue grow through the June quarter.

Unlike other advanced economies, such as the United States and the United Kingdom, Australia is not at great risk of a recession. While inflation, and the Reserve Bank's efforts to contain inflation by tightening monetary policy, are expected to begin slowing economic activity, the fundamentals of the Australian economy remain sound. Recent RBA forecasts project GDP growth to slow from 3½% in 2021-22 to 2¼% in 2022/23, then 1¾% in 2023-24. While slowing, economic growth will remain within the range of the long-term average over the past decade of 2%.

Inflation

Alongside labour & skill shortages, inflation and rising business costs are the dominant concern for Australian business and consumers, with the consumer prices (CPI) increasing to 6.1% and producer prices (PPI) increasing 5.6% in the year to June 2022. Surging fuel prices (up 32% in the year to June) and the rising cost of new dwellings (up 20%), along with increasing food prices due to the east coast flooding events and ongoing supply chain constraints, are weighing heavily on consumers and businesses alike.

The crisis in the energy market is adding to the inflationary pressure. the Australian Energy Market Operator (AEMO) was forced to cap gas prices in May, then took the unprecedented step of suspended the entire east coast electricity market to ensure reliable supply and contain electricity prices. It is expected to take some time to restore stability in the gas and electricity markets, with households and businesses likely to face increasing power and gas bills in the near term.

Inflation is expected to get worse before it gets better, with the Reserve Bank currently forecasting inflation will continue to rise, peaking at 7¾% in the December quarter, before easing to 4% in 2023, then 3% in 2024.

The Reserve Bank has responded to the accelerating inflation by raising the cash rate four times in as many months to 1.85%. While still low by historic standards, the RBA is expected to continue to increase the cash rate over the remainder of the year to between 2½% to 3%, until there are clear signs the rate rises are dampening inflation. But the counter is that it will also slow economic activity.

Wages

While wages growth is yet to have a noticeable impact on inflation, it will increasingly become a factor. The wage price index rose steadily to 2.4% in the year to March 2020, but overall has been slow to respond to the increase in inflation and acute tightening of the labour market. Generally, this is a function of our centralised award system and enterprise bargaining, which gives great longer-term stability to wages.

This will soon be tested, following the decision by the expert panel of the Fair Work Commission to award a 5.2% increase in the minimum wage and 4.6% increase in modern award wages effective 1 July 2022. In addition, as enterprise bargaining agreements (EBAs) are steadily renegotiated in an environment of high inflation expectations, strong wages growth can be expected over the next few years.

The Treasurer's recent Economic Statement projects the wage price index to grow to 3¾% by June 2023 and remain at that level to mid-2024. This is only slightly above the 3½% the Reserve Bank Governor indicated was sustainable over the longer term without impacting on inflation. Based on both inflation and wages forecasts, real wages growth cannot be expected until the second half of 2023.

Labour and Skills

With COVID restrictions now almost fully unwound and strong growth in economic activity, the labour market has become extremely tight. Employment reached a record high, with 13.6 million people in work in June 2022, 3.3% higher than 12 months earlier and 4.6% above the pre-COVID level (March 2020 peak). The participation rate is also at a record level of 66.8% with a high demand for workers attracting more women and older people back into the workforce.

This is also contributing to very low unemployment (at 3.5% in June 2022) and underemployment (6.1%) rates, which have fallen to levels not seen in almost 50 years. Unemployment is below the level both Treasury and the Reserve Bank has identified at full employment. Research by Treasury and Reserve Bank had estimated the non-accelerating inflation rate of unemployment (NAIRU), which is viewed as a measure of full employment, to be somewhere between 4% and 4½% unemployment.

Job vacancies are also at record levels, over double the number prior to the beginning of the COVID pandemic. Most recent ABS Labour Force and Job Vacancies data show that there is now more than one job vacancy (480,000 in May quarter 2022) for each unemployed person (473,600 in July 2022). When you take into account job transition, skills mismatch and dislocation between the job and potential employee, then there is clearly insufficient workers to fill the available jobs.

While low unemployment is welcome, it is contributing to a severe labour and skills shortage, which is placing tremendous strain on businesses. Lack of workers, in addition to a high level of absenteeism due to the high COVID infection rates, is forcing many businesses to operate reduced hours/days and is holding them back from operating at their full capacity.

The tight labour market is expected to continue for some time, with recent RBA forecasts projecting unemployment to continue to edge down to 3¼% by the end of 2022, before rising slowly back to 3½% in 2023 and then to 4% by the end of 2024.

Productivity

The key to strengthening the Australian economy and buttressing it against the challenges of rising inflation and a severe labour and skills shortages is to increase the size and productivity capacity of the economy. Productivity growth is the key to sustaining economic activity, creating jobs and maintaining our future living standards.

Yet Australia's productivity growth has slowed since the turn of the century. The recently released Productivity Commission's Interim Report of the 5-year Productivity Inquiry shows Australia's productivity grow over the past decade at its slowest pace in 60 years, at an average of just 1.1% per year.

The main challenge achieving further productivity gains is that services sectors are expanding at a much faster rate than goods as we become more prosperous. Services sectors are comparatively less productive than good sectors and productivity growth is more difficult to achieve. Australia productivity performance is expected to continue to deteriorate with further growth in services sectors, particularly government funded and regulated non-market services such as schools, aged-care, childcare and disability support services, where a lack of competition and contestability masks underperformance.

Recognising the challenges, the Government has recently announced it will cut future productivity growth forecasts to 1.2% per year in the October 2022 Budget, in line with the average over the past 20 years. This compares to the forecasts in the April 2022 Budget which based the average on productivity growth over the past 30 years of 1.5% per year. This will have a sizable impact on Australia's economic growth going forward. Treasury's Intergeneration Report released last year showed that the difference between an average productivity growth forecast of 1.5% per year and 1.2% per year, would result in nominal and real GDP being 9½% lower and wages growth 9¼% less over the next 30 years.

Yet if we are to achieve a sustained long-term economic recovery from the COVID-19 pandemic, we need productivity growth to be stronger than that experienced over the past 30 years. Labour productivity must rise at a rate above 1.5% per year if we are to wind back the mounting government debt and maintain our living standards into the future. There needs to be a concerted effort by government to put in place the conditions for strong, sustainable, productivity growth.

Australia needs greater investment in productive capital, which can be increased through government and private sector initiatives that direct expenditure to high priority infrastructure and target business investment, to drive innovation and technical improvement. We recognise much of the heavy lifting to improve productivity rests with business. But, to allow business to meet the challenges over the coming decades and seize opportunities, we need reforms that will give the structure, flexibility and entrepreneurial culture to create the dynamism, resilience and competitiveness needed for businesses to thrive.

Budget Priorities

We recognised that the Government has scheduled an October 2022 Budget to implement its election priorities and key short term policy ideas that may arise the Jobs and Skills Summit. However, this Budget and the schedule one in May provide an opportunity to steer the economy down a path that will substantially improve our productivity performance and further strengthen economic growth. Australia's future prosperity is heavily dependent on the steps that need to be taken to increase productivity and it is essential that opportunities to lift our poor productivity growth are identified and acted upon.

To increase productivity and economic growth, while addressing the key challenges of inflationary pressure and the labour and skills shortage, key priorities must include:

- **Skills** – Creating opportunities to skill and reskill our workforce to overcome the labour market shortages by funding training places and long-term investment in apprenticeships, as well as increasing the number of permanent skilled migrants
- **Jobs** – Increasing workforce participation by creating new opportunities to work for women, older Australians, youth, and people with a disability.
- **Small business** – Encouraging small business investment, reducing regulatory red-tape and making regulation more efficient through technology.
- **Growth** – Growing businesses through incentives for large longer-term investments and correcting the corporate tax mis-match with a uniform 25% tax rate for all businesses
- **Sustainability** – Providing certainty for business by integrating our energy and environmental goals, maintaining a technology-neutral approach to domestic electricity generation to deliver and becoming world leaders in sustainable technology and infrastructure.

ACCI acknowledge the welcome early action by Government in convening the Jobs and Skills Summit, legislating the emissions reduction targets in the Climate Change Bill 2022 and seeking Jobs & Skills Australia. Yet there is still much more to be done.

The following identifies actions that can be taken to address the challenges and accelerate economic activity in the coming years.

Australian Chamber of Commerce and Industry

Skills

The skills and education system is a key component in boosting productivity, and in order to deliver significant growth, it needs to operate efficiently and effectively. We note that a key objective of Labor's five-point economic plan is to *better train our workforce through fee-free TAFE and more university places to equip Australians with critical skills to address the nation's skill crisis*.

It is agreed that skills must be the priority in Australia's overall economic plan. There are a broad range of ways this can be achieved.

Recommendation

- Commit to long term, consistent funding for VET which delivers an additional 300,000 students annually to ensure the economy's skill needs are adequately met.
- Fund apprenticeships to provide:
  - A wage subsidy of 30% for 12 months for both trade apprenticeships as well as 2-year traineeships.
  - A wage subsidy of 30% for 6 months for one-year traineeships.
  - Incentives and mentoring support to apprentices to support retention
- Establish a National Apprenticeship Advisory Board.
- Fund a review of industry pathways to provide strong guidance to students undertaking VET in Schools and pre-apprenticeships.
- Fund Jobs and Skills Australia to undertake a biennial National Workforce Development Strategy.
- Funding, and potential co-funding, of micro-credentials to encourage the continual up-skilling of the workforce.

Rationale for Proposed Policy

Consistency of VET funding has been an issue for the last decade at all levels of Government, not just between jurisdictions, but also within them. Compared to the other sectors in education (childcare, schools and higher education), VET has been poorly served by funding and policy decisions made within a complex federated model. While we acknowledge the significant additional investment made in response to COVID, we need to be clear that the future will deliver funding growth and consistency.

In this context, ACCI looks forward to the finalisation of the new National Agreement on Skills and Workforce Development (NASWD). It was disappointing to see that the finalisation of the agreement is further delayed as we are keen to see all jurisdictions commit to a real funding increase in VET. This commitment, if fulfilled, will greatly assist in avoiding cost shifting, fluctuations in overall funding investment and further limitations on training providers who service critical skills shortages areas.

In order to measure increased investment in a complex system such as VET one of the key outputs would be the number of students funded (either wholly or partly) to undertake VET given that the national agreement money flows to the State & Territory governments.

The Government's commitment to increase fee-free funding to TAFE needs to be broadened to embrace all provider types on an evidence base to ensure the best outcomes for both workers and employers. This is an opportunity to put in place a long-term funding solution for VET that delivers quality education and real growth in funding as well as greater consistency and certainty.

Apprenticeships and traineeships allow particularly young people, with no or little work experience, to be employed as well as obtain highly valuable skills. They are vital to building our national skill base. This Budget provides the opportunity to develop a longer term, strategic platform for apprenticeships that focuses on sustainably increasing apprenticeship uptakes.

The new Australian Apprenticeships Incentive System (AAIS), beginning on 1 July 2022, is totally inadequate for the task of continuing the growth in apprentice and trainee numbers. The scheme, which provides a wage subsidy for occupations on the Australian Apprenticeships Priority List (AAPL), of 10% over the first two years of an apprenticeship (up to $6,000) and 5% in year 3, is completely insufficient to drive apprentice growth. Importantly, the AAPL, with 77 occupations included, is too restrictive for our current skills crisis, is overly dominated towards traditional trades and misses vital traineeships, particularly in female dominated industries.

It is a disappointing reflection on how little was learnt from the success of the Boosting Apprenticeship Commencement (BAC) and complementary Completing Apprenticeship Commencements (CAC) programs. Although it is accepted that the BAC 50% wage subsidy was no longer sustainable or justified, funding decisions around apprenticeship support have again displayed a lack of understanding of the business case particularly in the first year of hiring.

It is critical that sufficient investment is made to allow apprentice growth to continue by ensuring that it is affordable for an employer to take on an apprentice or trainee, so they can replenish skill levels and confidently employ apprentices.

In line with agreed positions negotiated by ACCI, Ai Group and the ACTU, a National Apprenticeship Board be established reporting to Jobs and Skills Australia to oversee a national approach to apprenticeship qualifications and consider new industry requests for qualifications to be recognised for delivery as apprenticeships and traineeships. This may eventually replace the role of all State apprenticeship boards although this would be a decision for each jurisdiction. It would provide valuable guidance for both the short- and longer-term structures of apprenticeships. The scope of the advice could also embrace apprentice pathway courses, including VET delivered at schools and pre-apprenticeships, which work best when tailored on an industry-by-industry approach. The Board would also be well positioned to examine any issues in the apprenticeship system that are creating barriers for take-up by either the employer or the job seeker.

There is a real imperative for the voices of industry to be front and centre in this policy space. The proposed governance and role of Jobs & Skills Australia and the role of the

Skills Clusters may satisfy part of this need, industry's voice in advising on apprenticeships specifically is critically important.

Skills needs as well as shortages (noting that these are not the same), together with a better-informed careers market, are high priorities for the business community. It is vital that under the JSA that there is a consolidation of labour market analysis and forecasting to ensure decisions regarding skills and training needs, skilled migration occupation lists and employment policy and programmes are well informed by data and evidence from state/territory and national levels and, most importantly, industry. It should also be tasked to provide a robust, evidence-based, independent picture of investment and funding in the VET system.

ACCI recommends the establishment of a biennial National Workforce Development Strategy. It would examine in depth Australia's current, emerging and future workforce skills needs but it would also consider the supply side of the system and make recommendation about the performance and adequacy of the supply side to meet the demand. With the proposed approach to strategic workforce planning through Industry Skills Clusters, there is an opportunity to formalise the link between the Clusters and the JSA with collective effort to produce a biennial National Workforce Development Strategy.

To adapt to a rapidly changing economy, upskilling and lifelong learning are increasingly important. The makeup of our workforce cannot rely solely on new entrants, the reskilling of existing workers needs to be a key consideration for plugging our skills gap. This could be either through businesses choosing to upskill their staff or workers seeking new opportunities. The use short courses or micro-credentials will allow for rapid upskilling of workers without taking them out of the workplace, this will be key for areas such digitalisation in the workforce and the ever-increasing pace at which it is been adopted which will require a high level of technical training.

Jobs

The current skills and labour shortages demands that we put every effort into increasing workforce participation. We need to get the long-term unemployed back into work, assist younger workers to enter the workforce, enable parents to return to work through improved childcare arrangements, and keep more older workers in the workforce.

While employers want to see workers from all of these demographics enter the workforce, there are certain barriers preventing these workers from achieving their full potential.

Recommendation

Workforce Participation

- Adequate funding is required to ensure the enhanced servicing of the long term unemployed is able to function as intended.

- Implement a *Training to Work* program to fill the gap created by the abolition of PaTH and extend it to other cohorts on the jobactive caseload such as people with disability and mature age jobseekers.
- Reintegrate the public funded service for people with disability back into the core employment system.
- Deliver the election commitment to make childcare more accessible and affordable, with more options to assist parents to return to the workforce sooner.
- Extending the $4,000 income bank credit for aged pensioners beyond June 2023 at least into the next financial year while labour shortages are at a crisis. Ideally, this figure needs to reflect the opportunity to bring pensioners back into the workforce for 2 to 3 days per week

Enterprise Bargaining

- Support the implementation of legislated Paid Domestic Violence Leave through advisory, assistance and referral resources for employees and employers.
- Establish new program in the Department of Employment and Workplace Relations to actively promote workplace productivity and enterprise bargaining
- Fund bargaining coaches for employers and employees to promote bargaining and productivity improvement
- Provide additional resources for the Fair Work Ombudsman (FWO) to assume added responsibilities following the planned abolition of the ABCC
- Provide additional resources for the Fair Work Commission (FWC) to more actively support and facilitate enterprise bargaining

Skilled Migration

- Reduce the complexity of visa application processes and costs.
- Reduce the SAF Levy for temporary and permanent employer nominated visas by halving the training levy and improving the refund policy

Work Health and Safety

- Fund an independent review of the Intergovernmental Agreement for harmonised work health and safety laws in Australia, to achieve ongoing harmonisation and a commitment to best practice regulation.
- Reinstate funding for Safe Work Australia social partners

Rationale for Proposed Policy

Workforce Participation

ACCI is an active participant in the employment services advisory group working with Government as it implements a new employment services Workforce Australia model. The central recommendation of the Independent Panel ("I Want to Work" 2019), that reviewed employment services delivery, was that the unemployed who faced the least barriers be adequately serviced by a digital system, and the savings be redirected to enhance the face-to-face service provided to those that needed it most. The implementation of the current trials, and the subsequent introduction of the new system, needs to be supported by adequate funding that ensures the enhanced services to the long term unemployed reduce servicing ratios and makes a difference to the outcome for these jobseekers. With the current skills and labour shortages, there has rarely been a better time to put every effort into getting the long-term unemployed back into work. Despite this, last year's Budget saw a further significant reduction in the budget envelope for employment services, estimated to be around $1.1 billion in savings over 4 years. At a time when the need for appropriate support for job seekers is so paramount, this savings measure is counterintuitive. It is essential in the new model that the servicing of the long term unemployed is adequately funded.

We accept the new Government's decision to abolish PaTH, but stress that it must be replaced by a new scheme that will address the significant barriers that exist for the long term unemployed to break into the workforce. The original concept advocated by ACCI prior to the introduction of the youth PaTH program was that the jobseeker undertake vocational training concurrent with work experience in a hosted environment (traineeship type model) and at the end of the hosted period, the options for the employer were to:

- take them on to finish their traineeship; or
- employ them outside of the apprenticeship system; or
- conclude the arrangement so that the jobseeker could take their vocational skill set and experience and look for work elsewhere.

We named this concept *Training to Work* – reflecting the link between nationally recognised training and work experience being a pathway to employment. We strongly recommend to government implement this model and that it be extended to other cohorts within the public funded employment services such as people with disability and mature age jobseekers.

The ambition of Government and for the community generally, should be that more people with disability are in work, with a significant shift in participation rates, not just seeking to make a marginal improvement. The latest ABS data reveals the participation rate of people aged 15 to 64 with disability is 53.4%, compared with 84.1% of people in the same age range without disability. The participation rate decreases with severity of the disability, with a participation rate of 27.2% for those with profound or severe disability, compared with 55% for those with moderate or mild disability. More effective assistance for disadvantaged job seekers, particularly those with disability, is crucial to increasing workforce participation and extending working life. It is also essential that more employers are aware of, and access, the employment services that aim to assist people with disability to find work. This can best be achieved by reintegrating the employment service for people with disability back into the core employment system, to create and more effective single contact service for employers and to maximise the value of the reforms being made to the core employment services.

Workforce participation dips for women in their thirties, when many start having children. And when women with children do undertake paid work, they are much more likely to work part-time than in comparable OECD countries. While the female participation rate has increased to in recent years, there is still clear scope to further increase participation and skills utilisation. To achieve an improved participation rate, ACCI supports the Governments proposed increased investment in childcare, with a focus on reducing the gap costs particularly for women at lower income levels. In addition to this increased investment, scheduled to commence in July 2023, there are three areas that could be considered as part of childcare reform including:

- Expanding access to subsidies for home care
- Developing a new visa arrangement for au pairs:
- Providing income contingent loans for upper income earners that allow families to spread the costs of childcare:

There is an army of older workers with the skills Australia needs but is currently unable to engage due the pension income test. We acknowledge and appreciate the action arising out of the Jobs & Skills Summit to provide a temporary upfront $4,000 income bank credit to allow them to work and earn more in 2022-23 without impacting their pensions. We ask the Australian Government to further consider extending this beyond June 2023 at least into the next financial year while labour shortages are at a crisis. Ideally, this figure needs to reflect the opportunity to bring pensioners back into the workforce for 2 to 3 days per week.

Enterprise Bargaining

A national dialogue is needed to re-start enterprise bargaining and harness the power of employers and employees working together to improve productivity, wages growth, job security and the security and resilience of enterprises. This has clear implications for the Budget and our economy. The Jobs and Skills Summit began the conversation, but much more work is needed to progress shared priorities for effective, productive enterprise bargaining reform.

Following a decade of bargaining decline, new concepts and mechanisms are needed if amendments to workplace relations legislation are to deliver their intended benefits for productivity, wages, jobs and enterprise security. Government should also look to invest in complementary and supporting initiatives, including:

- Advisory, assistance and referral resources to support the implementation of legislated Paid Domestic Violence Leave
- A new program in the Department of Employment and Workplace Relations to actively promote workplace productivity and enterprise bargaining through:
    - clear, accessible information on bargaining and agreement making for employers and employees.
    - promotion of best practices and case studies of positive, productive bargaining.
    - tools to measure productivity, able to be adapted by enterprises.

- Coaches to support employers and employees through the initial stages of bargaining as they work towards productivity-enhancing enterprise agreements
- Additional resources for the Fair Work Ombudsman (FWO) to assume added responsibilities following the planned abolition of the ABCC.
- Additional resources for the Fair Work Commission (FWC) to, more actively, support and facilitate enterprise bargaining, undertake any expanded role in the settlement of small underpayment claims, develop research capacity on pay equity and the care economy, and address any other additional responsibilities which cannot be met through existing budget allocations.

Skilled Migration

The closing of the Australian border during the COVID crises effectively halted Australia's migration programme, with significant economic and fiscal consequences from the net migration loss. We need to urgently restore Australia's migration program by improving its accessibility and responsiveness, including the need to allow employers to sponsor migrants in any skilled occupation. Cutting complex visa application processes and costs will once again make Australia an attractive option for temporary skilled migrants, international students and working holidaymakers. Research by the Committee for Economic Development of Australia shows skilled migrants have lower unemployment rates and high labour force participation rates, making them a valuable contribution to our economy. Not just increasing the number of taxpayers, this helps boost spending in areas like housing, retail and tourism.

The SAF levies applying to skilled migration are well in excess of what is reasonable, particularly as the SAF Levy is paid upfront for the whole term of the visa. In addition, it is inequitable that a sponsoring employer cannot obtain a refund for the training levy if their application is unsuccessful. The levy is no longer fit for purpose, particularly where there is evidence of significant investment in training by the sponsoring employer. ACCI recommends that the SAF levy be halved and that the refund policy is improved. The levy proceeds also need to be better targeted to those occupations where migrants are being sponsored. The current economic circumstances and Australia's dire need for additional workforce participants overrides any benefit of continuing the levy as it currently operates.

In addition to the welcome increase in the permanent migration planning levels for this financial year to 195,000 we urge the Government to consider reflecting in the forward estimates planning levels of at least 195,000 and preferably 255,000 for 2023-24 (200,000 skilled places) and at least 195,000 in 2024-25 (144,000 skilled) and ensuring the program is responsive to skill needs across the economy by making all skilled occupations eligible for sponsorship (as it was prior to 2017).

Work Health and Safety

Inconsistent adoption of the model WHS laws increases regulatory compliance costs for businesses, undermines the goal of increased productivity through a seamless national economy and contributes to delays in the transition of goods, equipment and services between jurisdictions. All Governments (Federal, state and territory) must recommit to the intent of harmonised work health and safety laws to achieve the intended objectives.

For 30 years (1985-2014) the worker and employer representatives of Safe Work Australia (SWA) (and its predecessors), were funded by the Commonwealth to assist them to fulfil their obligations as members of SWA. The funding ensured the functions of SWA were performed in accordance with strategic and operational plans and provided a policy and regulatory interface between employers / workers and SWA. It funded critical activities such as the establishment of targeted consultative forums and the dissemination of relevant information on SWA's activities to business and worker communities. This was a proven mechanism to maximise the dialogue and social partner engagement SWA needs to do its work effectively.

Small Business

To enable Australia's budding small businesses to flourish, we need to help them invest and grow their business, so that they can reap the economic benefits. From improving digital capabilities and staff training to investment in machinery and equipment, these investments represent a significant risk and place a huge financial strain on a budding small business. Greater incentive and support is needed to encourage owners to invest back small business.

In addition, government regulation is an increasing burden for small business. It's time to create a better regulatory environment for Australian small businesses. This does not necessarily mean less regulation, but more effective and efficient regulation, that achieves the policy objective without placing administrative and compliance burden on small business. At all levels of Government, the primary focus must be on fit-for-purpose regulation that is simple and outcome-focused.

Investment in technology, software and digital transformation act as enablers of productivity across multiple sectors, particularly newer firms and SMEs. While COVID accelerated the uptake of information technology in our economy over the past two years, it is crucial to maintain this momentum. Supporting and encouraging firms across all industries to invest in information technology and digital capability, is essential in enabling them to grow and compete.

Recommendation

Small Business Investment

- Continue to support investment by extending the Temporary Full Expensing measure beyond 2023.
- Make permanent the 20% tax deduction bonus for small businesses under the Technology Investment Boost and the Skills Training Boost to improve their digital capability and upskill their workforce

Regulation

- Increase investment in digital technologies like RegTech to reduce the compliance and administrative burden of regulation on businesses
- Work with states and territories to simplify and streamline regulation to avoid duplication and simplify process.
- Impose greater accountability on the cost recovery process for regulatory agencies and ensure incentives are in place to drive efficient regulation.

Rationale for Proposed Policy

Small Business Investment

Leading up to the pandemic, business investment in depreciable assets like plant, equipment and machinery was already weak. This was exacerbated by COVID, with a 21% decline between the December quarter 2019 and September quarter 2020. To reinvigorate business investment, the Temporary Full Expensing (TFE) initiative was introduced in the October 2020 Budget. TFE allows businesses with a turnover of up to $5 billion to claim an immediate tax deduction for the cost of an eligible depreciable assets in the year of purchase or installation. With the support of TFE, non-mining business investment in plant, equipment and machinery increased 39% between the September quarter 2020 and December quarter of 2021 year. The TFE measure is set to expire on 30 June 2023, with no proposed alternative to replace it. Unless it is extended, or replaced with another similar measure, all assets valued above $1,000 purchased after 1 July 2023 will need to be depreciated over an extended period, following standard depreciation schedules. This would be a huge setback, smothering small businesses investment and stunting the economic recovery at a time when it needs to be building momentum. There is a strong case to retain the full expensing arrangement for at least another two years, to at least June 2025, to continue to support investment and improve productivity performance as businesses emerge from the COVID disruptions.

Investment in technology, software and digital transformation act as enablers of productivity across multiple sectors, particularly newer firms and small business. While COVID accelerated the uptake of information technology in our economy over the past two years, it is crucial to maintain this momentum. Supporting and encouraging firms across all industries to invest in information technology and digital capability, is essential in enabling them to grow and compete. ACCI welcome the recently announced backdating of the Technology Investment Boost and the Skills Training Boost to 29 March 2022 and its extension to 30 June 2023. However, ongoing support is needed to enable small business to keep up with rapidly changing digital technology. These two programs should be made permanent. This will greatly assisting small businesses to improve their digitisation processes and provides much-needed incentive to invest in skills of their staff over the longer term.

Regulation

Governments departments and agencies collect and store vast amount of business data. A major frustration for many businesses is the complexity and time taken to comply with government processes and regulations. Businesses often find they are providing the same information to several different arms of government.

The use of RegTech offers opportunities to better coordinate this data collection — applying a tell-us-once approach. This data can be made available in a range of forms, while still protecting the security of data and the privacy of the data sources. Governments can also make better use of data to improve their service delivery and the functioning of government.

A single digital portal, where much of the information can be prefilled based on information provided previously or to other government agencies, can greatly reduce the compliance and administrative burden of regulation on businesses (i.e. red-tape).

While there has been increased investment in RegTech in recent years, there is still far more that can be done to improve the user interface of regulatory digital portals and reduce the information input requirements, and through greater data sharing between Federal Government departments, as well as between Federal and state/territory government departments.

Unnecessary duplication of regulation administered by the Commonwealth and the states / territories is a long-standing issue which needs to be addressed. For example, to gain environmental approvals for projects, businesses are often required to go through parallel approval processes at the Commonwealth and state / territory level. This can cost businesses thousands to millions of dollars, and hundreds of hours, and is often followed by lengthy approval times. Better collaboration between the Commonwealth, states and territories is needed to streamline regulation, simplify processes and avoid duplication.

Many regulatory agencies are reliant on full-cost recovery for their regulatory services, which provides little incentive to bring in efficient regulation. Costs for regulatory services are continually rising, along with the complexity and additional regulatory burden. The Government's Cost Recovery Guidelines include three cost recovery principles: efficiency and effectiveness; transparency and accountability; and stakeholder engagement. Policy is clearly failing in these areas, particularly in terms of transparency and accountability. There needs to be greater accountability for cost recovery by regulatory agencies and greater incentive for them to deliver efficient regulation.

Growth

To lift Australia's lagging productivity and enable businesses to become more globally competitive, more needs to be done to encourage investment in capital assets by businesses, infrastructure, and R&D and innovation. In addition, tax reform is fundamental to support business growth and raise Australia's productivity performance.

Recommendation

Large-scale Investment

- Introduce a broad-based investment allowance of 20% of the value of an asset purchased for larger-scale, longer-term investments in plant and machinery.

Infrastructure

- All proposed infrastructure investment should be independently assessed and undergo stringent cost-benefit analysis prior to commencement
- Greater focus on regional infrastructure as an enabler of decentralisation.
- Finance public infrastructure through the issuing of government securitised infrastructure bonds.

Commercialisation of R&D and innovation

- Foster the commercialisation of R&D and innovation in Australia through continued support for, and a broadening of, the patent box to all industry sectors
- Stimulate investment and assist businesses to commercialise R&D and innovation in Australia though low-interest loans and other financial assistance

Tax Reform

- Begin the process of comprehensive tax reform, including the GST, by placing tax reform as a standing item on the Council of Federal Financial Relations agenda.
- Extend the small business 25% corporate tax rate to cover all small to medium enterprises by increasing the base rate to a turnover of $250 million.
- Limit any increase in alcohol excise to within the RBA target range of 2% to 3% to prevent it from stoking inflation.
- Abolish the Luxury Car Tax (LCT) to stimulate car sales and improve environmental performance.
- Take a leadership role, working with the state and territory governments, to reduce the burden of payroll tax on business.
- Extend the grandfathering arrangement for the Offshore Banking Unit by a further 18-24 months to enable a comprehensive analysis and discussion to take place with users to assess its impact.

Rationale for Proposed Policy

Large-scale Investment

Business investment is a catalyst for productivity growth and major driver of economic activity. Investment typically brings new technologies, which boosts productivity through skills development and innovation. Greater investment in new capital assets is needed to lift and sustain productivity growth and raise economic activity over the next decade.

While TFE has been very successful in stimulating smaller business investment in plant and equipment, we also need an avenue for businesses of all sizes to make larger-scale investments in heavy industrial machinery and large-scale equipment. Larger-scale investments require substantial upfront capital that may require several years to realise a return. Offering an investment allowance of 20% of the value of depreciable assets over $500,000 will help businesses justify the initial upfront cost of capital. An additional tax allowance for larger-scale, longer-term investments will give businesses the confidence to make these bigger investments, helping them achieve greater productivity gains. It will also go some way to mitigate the impact of the high corporate tax rate on large businesses.

Infrastructure

Greater investment in infrastructure is needed across a range of sectors, particularly transport, communications, energy, water and waste, to improve the liveability of our cities, reduce congestion and increase productivity. For decades, investment in infrastructure has failed to keep up with the demands of our growing population and expanding cities, leaving Australia's major cities under severe strain. ACCI welcome the Government's pre-election commitments to renew role of Infrastructure Australia to provide independent advice in infrastructure investment, to refocus the City Deals program, deliver a new National Urban Policy Framework and expand the Local Roads and Community Infrastructure programs. In enhancing Infrastructure Australia's role to independently assess and priorities infrastructure investment, it is vital that all proposed investments are required to undergo stringent cost-benefit analysis prior to commencement. This will ensure it is cost effective and the most efficient investment to meet a specific need.

While our cities are under stress, our regions are also under pressure. The poor quality of infrastructure in many regional areas is a major barrier to attracting people and businesses to those areas. Greater investment in new, and maintenance of existing, infrastructure is vital to enabling greater decentralisation and supporting regional growth. Governments need to look beyond congestion in our capital cities to the quality of regional infrastructure and regional services.

To reduce the burden on governments to finance major infrastructure projects, there is considerable scope to leverage the superannuation sector's $2.7 trillion in funds. A large amount of public debt has been built up during the pandemic, which is impairing Commonwealth and state and territory governments' balance sheets. Securitised borrowing in the form of infrastructure bonds, offers an alternative means of funding investment in public infrastructure. Infrastructure bonds offer the opportunity for a range of investor types such as superannuation and pension funds, as well as insurance companies and sovereign wealth funds to investment in Australian infrastructure.

Commercialisation of R&D and innovation

Investment in research and development (R&D) and innovation is fundamental to lifting productivity and maintaining the international competitiveness of Australian business. Yet, Australia is falling behind on all international comparisons. At below 1.8% of GDP, Australia's investment in R&D and innovation is well below the OECD average of 2.4% of GDP and that of other major economies such as Japan (3.2%), Germany (3.0%) and the United States (2.8%).[1] High tax rates, high interest on loans and a lack of funding support, all act to discourage business investment in R&D. We

[1] ABS 2021, *Research and Experimental Development, Businesses, Australia: 2019-20 financial year*. https://www.abs.gov.au/statistics/industry/technology-and-innovation/research-and-experimental-development-businesses-australia/latest-release

need to elevate R&D and innovation in Australia to sustain future economic growth, with the Government having an important role to play in facilitating greater R&D.

The patent box, enabling businesses to access a lower tax rate of 17% on profits derived from eligible intellectual property was a positive measure, but too limited in scope. It should be broadened to patents in all industry sectors, with a particular focus on manufacturing and information and communications technology where significant opportunities are emerging. Further, more needs to be done to assist companies to overcome the 'commercialisation chasm', where companies are unable to access funding to commercialise R&D and innovation in Australia. These companies typically move overseas to realise the full potential of their inventions and innovation. In addition to the lower tax rate provided by the patent box, direct support is needed, through low interest loans or other financial support, to assist businesses to start-up and scale-up, enabling them to capitalise R&D and commercialise innovation in Australia. By offering Australian businesses access to the support they need to nurture their ideas, we can reap the benefits of Australian innovations and technology break-troughs on our shores.

Tax Reform

Improving Australia's tax and transfer system must be a high priority for the new Government. In its current form, Australia's two-tier tax system is too reliant on unsustainable and distortionary taxes that are either inherently inefficient or inefficient by design. Achieving comprehensive tax reform will require the federal, state and territory governments working together to agree on and implement systematic policy responses that remove impediments and increase the incentives for individuals and businesses to engage in economic activity, seize opportunities, and be creative and innovative.

The tax system must be more supportive of business growth, with a lower corporate tax rate that enables them to be more competitive in global markets and to attract foreign investment. The misalignment between the 30% tax rate for medium and large businesses and 25% for small business with an aggregate turnover less than $50 million per annum is inhibiting the growth of more than just larger businesses. Small businesses rely on larger businesses as both suppliers and customers, meaning the repercussions are felt across the board. To support growth and make all businesses more competitive, the corporate tax rate must be lowered to 25% for all businesses. ACCI recognise the current fiscal constraints facing the government and the substantial impact on the Budget if the corporate tax rate were lowered to 25% immediately for all businesses. To limit the impact, consideration should be given to doing it incrementally over time, by firstly increasing the base rate entity eligibility criteria to businesses with an aggregate turnover of less than $250 million. This will enable both small and medium-sized Australian businesses to be more competitive in international markets, encourage greater reinvestment to drive business growth and make Australia more attractive for foreign investment.

Alcohol excise indexation is tied to inflation and applied twice yearly on 1 February and 1 August. Recent strong growth in inflation of 6.1% in the year to June 2022, drove an increase in alcohol excise of 2.1% on 1 February then 4% on 1 August2022. With inflation forecast by the Reserve Bank to continue to rise over the remainder of the year, then remain high over the next two years, further substantial increases in alcohol excise can be expected. With alcohol & tobacco accounting for 9% of the CPI basket, the strong growth in alcohol excise will only feedback to stoke inflationary pressures. In this period of high inflation, the Government should be doing all it can to prevent a tax/inflation spiral. Limits should be placed on alcohol excise indexation, with the rate capped at the middle of the Reserve Bank's target range (2.5% per year).

Without a car manufacturing industry in Australia, there is no longer an economic rationale for the luxury car tax (LCT). It is simply an additional cost borne by consumers that changes their decision on the type of vehicle to purchase. The LCT is also leading to perverse environmental outcomes, as hybrid and electric vehicles are more expensive than their petrol and diesel competitors and, with few exceptions, exceed the LCT threshold. The LCT is not consistent with the Government's recently released Electric Vehicle Strategy, to improve uptake of electric vehicles by improving affordability and choice of vehicles in the Australian market. The removal of the LCT would provide an important boost to the uptake of low emissions vehicles.

State and territory governments rely heavily on payroll taxes for revenue, but it is extremely inefficient, placing a high administrative burden and imposing excessive compliance costs on business. While it is a state and territory tax, achieving reform requires the Commonwealth to play an active leadership role, as well as assisting and rewarding the states and territories in making significant changes. As a first step, the Commonwealth should work with the states and territories to include payroll tax reform on the Council of Federal Financial Relations (CFFR) agenda. Overall, the CFFR's long-term objective must be to phase out the states' and territories' reliance on payroll tax. However, initially, the CFFR should focus on reducing the administrative and compliance burden of payroll taxes on business, particularly through greater digitisation and integration of the states' and territories' payment platforms.

The Offshore Banking Unit (OBU) was repealed by the previous Treasurer in March 2021 at the behest of the OECD, but grandfathered for existing users until the end of the 2022 tax year, subject to an industry consultation process. The regime was designed to provide a level playing field for Australian companies to pursue offshore financial activities with companies located in lower tax jurisdictions, such as Singapore and Hong Kong. With the deadline for the end of the grandfathering period rapidly approaching and with no official consultation process having yet been undertaken by Treasury, ACCI is calling for the Government to extend the grandfathering arrangement by a further 18-24 months to enable a comprehensive analysis and discussion to take place with users to assess its impact This would also provide time for consideration of alternative regimes to maintain Australia's ongoing competitiveness in financial services with other jurisdictions in the Asia-Pacific region.

Sustainability

Since the election, Labor has appropriately affirmed, through updates to the UN as well as introduced legislation, significant commitments to reduce Australia carbon emissions, by boosting investment in renewable energy generation and transmission, to bring cheaper renewable energy to homes and businesses. While driving private sector investment in existing and emerging renewable energy technology is the priority, at the same time we need to maintain the reliability and security of the energy system and ensure energy costs remain low. Achieving a smooth structural adjustment requires a progressive shift to low emissions and renewable energy resources.

Infectious disease poses a significant global threat, impacting human and animal health, economic stability and the environment. The continuing threat of current and emerging diseases requires a coordinated national approach to global health security, disease surveillance and effective national preparedness and response.

Recommendations

Emissions Reduction and Energy

- Maintain and lower energy prices through a technology neutral approach to electricity generation and supply.
- Incentivise greater private R&D investment in developing technologies by reallocating CEFC and ARENA funding from now proven technologies of wind and solar to emerging technologies such as hydrogen and batteries.
- Work with state and territory governments to streamline energy policy, to avoid duplicating schemes in relation to energy efficiency, the costs of which are ultimately borne by all energy consumers

Disaster and Emergency Management

- Work with relevant industry and government stakeholders to co-design an Australian Centre for Disease Control (CDC).

Rationale for Proposed Policy

Emissions Reduction and Energy

The *Powering Australia* plan, and the RepuTex modelling that sits behind it, set out the new Labor Government's strategy to achieve the 43% below 2005 emissions level target. The focus is on renewable energy and electrification of sectors, such as transport and manufacturing.

While the targets are important to focus on an outcome, what is also needed is a more detailed roadmap setting out the timing of these investments and when new technologies are expected to be available. This should present a clear path for the rate of emissions reduction over the next 8 years. Further, work must commence now to develop a roadmap, with the milestones along the way, for emission reduction over the subsequent 20 years, to achieve net-zero emissions by 2050.

In developing the roadmap to 2030 then 2050, all technology options available need to be considered. It is essential Australia maintains a technology neutral approach to electricity generation and supply if we are to maintain the affordability, reliability and security of energy supply while we transition. This may mean we accept some energy sources and export opportunities that lower, but don't fully eliminate emissions, to keep the cost of energy down, retain jobs and realise the economic benefit. The residual emissions would need to be offset via a faster rate of reductions by other sectors or increased sequestration activities. For example, this may include transitioning from coal-fired to gas power generation as an interim measure until technologies such as battery storage and green hydrogen become efficient and cost-effective. Or plant millions trees to offset emissions from grey hydrogen while green hydrogen technology is developed, commercialised and scaled-up to be economic.

Australia has the capacity to be a leading player in the next wave of renewable energy generation, storage and transportable energy technology. For example, Australia has some of the largest reserves of lithium, cobalt and rare earths, giving us the potential to be a major producer and exporter of lithium batteries for energy storage and magnets for wind turbines. Similarly, our environment is well suited to further expansion of wind and solar generation to support green hydrogen production.

These are emerging technologies that still require significant research and development, as well as support to commercialise and scale-up production. There are substantial domestic and export opportunities from being a first mover and developing these technologies to an economic and commercial scale in Australia. Increasing incentives for R&D and supporting greater private investment in these technologies, will enable Australia to become a major supplier of renewable energy resources in the future. This can be achieved by shifting funding currently provided by Clean Energy Finance Corporation (CEFC) and Australian Renewable Energy Agency (ARENA) from now proven technologies of wind and solar, to support greater investment in these developing technologies, such as hydrogen and lithium batteries.

Given energy policy is not solely a Commonwealth responsibility, the Government needs to work with the States and Territories to improve the efficiency of the energy network and reduce costs to energy consumers. The Energy National Cabinet Reform Committee presents the opportunity to work with the States and Territories to streamline energy policy. Priority must be given to avoid duplicating schemes in relation to energy efficiency, supporting private investment in the energy sector to create better functioning energy networks and reduce energy costs.

Disaster and Emergency Management

ACCI supports the Governments policy for the establishment of an Australian CDC. COVID-19 has highlighted gaps in our preparedness to respond to a health emergency. Currently, there are few formal cross-sectoral and cross-jurisdictions structures to deal with a human and animal health emergency in Australia. A One Health model has become widely accepted approach to engaging experts from animal, human and environmental health disciplines, to manage future emerging diseases and pandemics.

ACCI propose the Government look to a One Health CDC model to provide centralised co-ordination of rapid responses by state and federal organisations to emerging threats to animal, human and environmental health.

About the Australian Chamber

The Australian Chamber represents hundreds of thousands of businesses in every state and territory and across all industries. Ranging from small and medium enterprises to the largest companies, our network employs millions of people.

The Australian Chamber strives to make Australia the best place in the world to do business – so that Australians have the jobs, living standards and opportunities to which they aspire.

We seek to create an environment in which businesspeople, employees and independent contractors can achieve their potential as part of a dynamic private sector. We encourage entrepreneurship and innovation to achieve prosperity, economic growth and jobs.

We focus on issues that impact on business, including economics, trade, workplace relations, work health and safety, and employment, education and training.

We advocate for Australian business in public debate and to policy decision-makers, including ministers, shadow ministers, other members of parliament, ministerial policy advisors, public servants, regulators and other national agencies. We represent Australian business in international forums.

We represent the broad interests of the private sector rather than individual clients or a narrow sectional interest.

ACCI Members

State and Territory Chambers

- Business NSW
- Business SA Chamber of Commerce and Industry South Australia
- Canberra Business Chamber
- CCIQ Powering business potential
- Chamber of Commerce and Industry WA
- Northern Territory Chamber of Commerce
- TCCI
- Victorian Chamber of Commerce and Industry

Industry Associations

- accommodation association
- accord
- AMCA
- Animal Medicines Australia
- APRA AMCOS
- AUSactive
- Australia Arab Chamber of Commerce & Industry
- AACS Australasian Association of Convenience Stores
- AuSAE The Australasian Society of Association Executives
- AADA
- Australian Beverages
- ACFA
- ACA Australian Chiropractors Association
- ADA Australian Dental Association
- ADIA Australian Dental Industry Association
- afta Australian Federation of Travel Agents
- Australian Finance Industry Association
- AHA
- Australian Institute of Credit Management
- Australian Made
- AMTA Australian Mobile Telecommunications Association
- ARIA Australian Recording Industry Association
- Australian Regional Tourism
- AREEA Australian Resources & Energy Employer Association
- ARITA
- Australian Retailers Association
- ARTA
- Australian Steel Institute
- ATEC Australian Tourism Export Council
- AVA Australian Veterinary Association
- BIA Boating Industry Association
- BIC Bus Industry Confederation
- Business Council of Co-operatives and Mutuals
- BECA Business Events Council of Australia
- Caravan Industry Association of Australia
- Cement Concrete & Aggregates Australia
- Chemistry Australia
- Clubs Australia
- ClubsNSW
- CMAA Concrete Masonry Association of Australia
- Consult Australia
- Consulting Surveyors National
- Consumer Healthcare Products Australia
- CPA Australia
- CLIA Australasia
- Customer Owned Banking Association
- Exhibition & Event Association of Australasia
- gta Gaming Technologies Association
- Governance Institute of Australia
- HIA
- IHEA Independent Higher Education Australia
- iteca Independent Tertiary Education Council Australia
- IPWEA Institute of Public Works Engineering Australasia
- ieaa International Education Association of Australia
- LFRA Large Format Retail Association
- Live Performance Australia
- Master Builders Australia
- master plumbers
- MTAA Medical Technology Association of Australia
- Medicines Australia
- NALSPA
- neca national electrical and communications association
- nesa national employment services association
- National Fire Industry Association Australia
- NRA National Retail Association
- NRMA
- Outdoor Media Association
- The Pharmacy Guild of Australia
- Queensland Tourism Industry Council
- rcsa
- Restaurant & Catering
- Road Freight NSW
- Think Brick Australia
- TAA Tourism Accommodation Australia
- Tourism Training Australia
- VACC