

Regional Migration Review

Australian Chamber – Tourism Submission

August 2024



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Introduction

Australian Chamber – Tourism (the Chamber) welcomes the opportunity to provide comment on the Government’s Regional Migration Review. The Chamber’s submission complements the submission of the Australian Chamber of Commerce and Industry (ACCI), of which the Chamber is a core component.

Migration offers many opportunities for our communities. As well as achieving cultural diversity, migration can assist in counteracting our ageing population, supplementing our workforce to fill skills and labour gaps, making us economically stronger, and creating jobs and improving Australia’s workforce participation rate.

As Australia’s migration settings undergo reform, it is imperative that the correct balance is struck to facilitate the right people in the right areas, under the right conditions.

An important element of this will be regional migration. Regional Australia plays a critical role in the success of Australia. Without its contribution to the economy through important industries – including but not limited to agriculture, tourism and travel, and resources – Australia would not be as diverse and prosperous as it currently is.

Crucial to supporting regional Australia is supporting migration to these areas. Without the supply of workers – temporary or permanent – to regional Australia, there would be significant impediments to the supply and delivery of goods and services which the Australian economy depends on.

The discussion paper rightly recognises that Australia is currently facing severe and prolonged worker shortages; this is particularly true for regional Australia. Any moves to reduce the capabilities of regional businesses to secure the necessary workforce through visa settings and incentives would almost certainly have a detrimental impact on their ability to operate and, subsequently, a devastating outcome for regional Australia.

A key aspect of regional migration is the Working Holiday Maker (WHM) program, which is an effective tool to encourage young and mobile travellers to stay and work in regional Australia.

WHMs are essential for Australian tourism, particularly in regional Australia, due to their spend as visitors and their contribution to the labour market. The WHM program delivers young, motivated and mobile workers who are willing and able to travel around Australia to fill jobs that do not typically attract domestic workers. These can be but are not always seasonal roles, and are in some industries and locations dependent upon a temporary workforce. They also make a critical contribution to regional hospitality and accommodation businesses particularly, either through directly working with and in these industries or by using them during their stay.

This submission outlines why this is the case, and makes the following recommendations on how to maintain and further the success of the WHM program into the future:

Intent of the WHM program:

- The cultural exchange delivered by WHMs travelling within Australia should remain the core intent of the WHM program.

Specified work requirements:

- The second- and third-year WHM visas and 88-day specified work requirement remain.

- Specified work required to qualify for second- and third-year WHM visas includes all employment undertaken in regional Australia.
- Specified work required to qualify for second- and third-year WHM visas includes tourism and hospitality work undertaken.
- The post-code list for the 88-day requirement be reviewed.

If removing the 88-day requirement:

- The following measures be put in place to incentivise WHM visa holders to travel and work in regional Australia:
 - Introduce financial tax incentives to support work in regional Australia, such as the removal of the backpacker tax;
 - Require that specified work be undertaken in regional Australia; and
 - Such work must be undertaken with an approved employer.
- Implement a transition period to support businesses to prepare for changing requirements.

Exploitation concerns:

- Recently implemented measures to address temporary migrant worker exploitation should be allowed to operate, with their effectiveness reviewed after a reasonable period, prior to any changes to the WHM program on account of exploitation concerns.
- Improve communication with and the provision of information to WHM visa holders on their rights while working in Australia, as well as other relevant information in real time, through a portal or other accessible manner, in all languages of WHM partner countries and regions.

Eligibility:

- Increase the age limit for WHM visas to 40 years of age. Consideration should be given to further increasing this to 45 or 50 years of age in coming years.
- Allow a second WHM visa for those who first used it before the age of 30 and have spent a minimum period outside of Australia.

Promotional activity:

- Allocate an additional \$5 million per annum for three years from 2025-26 to Tourism Australia to undertake promotional activities encouraging prospective WHMs to travel and work in Australia.
- Additionally, support Tourism Australia to implement targeted marketing efforts to mitigate the impact of the recent changes to UK WHM visas.
- Facilitate opportunities for Tourism Australia and travel and tourism industry representatives to provide input into policy decision-making regarding priority WHM countries and any caps on WHMs.

Data collection and publication:

- Provide appropriate support to Tourism Research Australia (TRA) to capture and analyse WHM data to assist in identifying growth opportunities.

Importance of the WHM visa

Travelling and working in regional Australia delivers a multitude of benefits both for the WHM, regional businesses and regional communities.

Typically, backpackers are attracted to the idea of moving around the country and are unlikely to remain in a fixed location for the duration of their stay. Data from prior to the pandemic indicates that WHMs tend to travel around and are more mobile than other travellers to Australia. On average, WHMs visited 2.9 Australian locations with an average population of 10,000 people during their trip.¹ Tourism Australia data recognises 43 per cent of WHMs visited 3-7 locations, while 19 per cent visited more than 8 locations.² Comparatively, 29 per cent of non-WHM youth travellers visited 3-7 locations, while only 8 per cent visited 8 locations or more.³ This highlights the effectiveness of the WHM program as a mechanism to travel, as well as reflecting WHMs mobility.

In the year immediately prior to COVID-19 restrictions, WHMs contributed \$3.2 billion to the Australian economy.⁴ More broadly, 44 cents of every tourist dollar spent in Australia was spent by WHMs in regional areas, injecting over \$726 million directly into regional economies. This is in large part due to the 88-day requirement.

Following the pandemic, Australia is competing with the rest of the world for the cohort of travellers who typically take up WHM visas. This factor along with others, including the increase in visa costs and travel taxes incurred when travelling to Australia – the 2023-24 Federal Budget increased a WHM visa to \$640 – make it difficult to rebuild WHM levels to where they were pre-pandemic and, subsequently, to fill regional workforce shortages. Additionally, from 1 July 2024, the Passenger Movement Charge (PMC) has increased by \$10 to \$70, which is another disincentive for WHMs to come to Australia.

Australia is currently facing severe and prolonged worker shortages; this is particularly true for regional Australia. As set out above, in many cases WHMs have a greater capacity than domestic workers to move around the country and address regional shortages when they occur. This mobility makes them attractive to the typically seasonal needs of businesses in regional Australia.

A specific example of this is with regard to regional tour guides. The WHM program is crucial for many tour operators due to the difficult nature of attracting staff. Tour operators have implemented various creative solutions to recruit and upskill local talent, including training programs and partnerships with local vocational institutions, however these have unfortunately not bridged the talent gap, and large shortages remain. WHMs are utilised in this respect to fill shortages where possible, and are helpful where domestic workers are unwilling or unable to do so.

Broadly, regional employers benefit by gaining access to a flexible and diverse workforce helping to fill labour shortages. In tourism particularly, they offer language skills which are highly valuable for regional tourism operators.

Noting their contribution prior to the pandemic, WHMs are typically high-return tourists, in that they often stay in the regions for longer periods of time to earn and subsequently spend a large portion of the money they earn. They provide substantial support to regional economies as their presence supports local businesses and enhances supply chain demand. Chamber members estimate that the loss of WHM to

¹ Flinders University (2021), [The Australia Experience: Perceptions of Australia's Working Holiday Maker \(WHM\) program, 2019-2020](#), July 2021.

² Tourism Australia (2019), [Working Holiday Maker Snapshot](#), December 2019.

³ Ibid.

⁴ Tehan, Hon D. and Hawke, Hon A. (2022), [Attracting more Working Holiday Makers](#), 31 January 2022.

regional Australia would see a \$200 million decrease in demand for intermediate goods and services, resulting in significant job losses and increased pressure on local industries, ultimately affecting profitability and consumer prices.

Further, Tourism Australia analysis has identified that for every 10 WHM visas granted, one full-time equivalent Australian job is created. Not only are they providing a direct benefit to the regions in which they work, but also to the broader Australian economy beyond this.

WHM visitors gain the opportunity to extend their travel, experience Australian culture, connect to communities and enhance their personal growth as well as becoming valuable 'cultural ambassadors' for Australia. Like each and every traveller who comes to Australia, we can be confident that that they will enjoy their experiences here and hope they will recommend our country to their friends and families as a destination. For WHMs, this is particularly important to ensure more prospective WHMs take up the opportunity while they are eligible.

Equally, tourism is an important support for WHMs. This is due to the mobility work travel and tourism can provide to these visa holders. Using the same example as above, regional tour guides embody the 'work' and 'travel' intention of WHMs. Some tour operator organisations also offer staff travel discounts across their brands, further supporting the 'holiday' part of the WHM intentions.

Accordingly, the Chamber considers the WHM visa to be a travel and tourist visa first and foremost, and it should stay this way. It is more than just a work visa – WHMs typically engage in a mix of activities including working, traveling, and studying, which significantly benefit local economies through their extended stays. The principle of 'travel first, work second' is essential to maintaining the visa's appeal and to fostering cultural exchange as originally intended when the visa was introduced in 1975.

Furthermore, this travel and work delivers more than just financial benefits – it also benefits Australia through cultural enrichment. Promoting the travel and cultural exchange facilitated by the WHM program, as opposed to the work component, will support the uptake of the visas while alleviating workforce shortages concurrently.

Recommendation:

The cultural exchange delivered by WHMs travelling within Australia should remain the core intent of the WHM program.

Securing the success of the WHM program

The Chamber welcomes the Government's position in the discussion paper that it is not considering limiting WHM visas to one year and agrees such action would result in significant damage to local economies in regional Australia.⁵

The flexibility of the WHM program provides opportunities for seasonal work for these visa holders, and for the businesses who employ them on a temporary basis. It also allows for WHM visa holders to follow work that suits their interests and desired locations, so long as they meet any applicable requirements.

⁵⁵ Discussion paper, pg13.

This is particularly important for travel and tourism. Not only does it supply the workforce that businesses in these industries in regional Australia depend on, but it allows those on a WHM visa to travel around the country during their time here, as they wish to.

Specified work requirements

It is the Chamber's firm view that the second- and third- year WHM visas should be continued. We are concerned that any restrictions or non-continuation of the second- and third-year visas will have an impact on Australia's ability to fill existing gaps and further exacerbate them.

Further, we believe that it is appropriate to maintain the requirement for WHMs to spend a minimum of 88 days each year undertaking specified work in regional areas to qualify for an extension of their visa. The 88-day requirement is a crucial lever to incentivise WHMs to travel around and work in the country for longer, and to do so in regional areas which depend on this cohort.

However, as a further incentive for WHMs to work in regional areas, the Chamber believes there is capacity to expand the specified work requirements to all work undertaken in regional Australia.

Specified work for the 417 visa currently includes work in the agriculture, mining, construction, and tourism and hospitality industries, as well as bushfire and natural disaster recovery work, and critical COVID-19 work in the healthcare and medical sectors.⁶ This is similar for the 462 visa, which currently includes work in the agriculture, construction and tourism and hospitality industries, bushfire and natural disaster recovery work and critical COVID-19 work in the healthcare and medical sectors.⁷

Expanding the eligibility of work available to all work undertaken in regional Australia will expand the benefits for WHMs, regional businesses and regional communities. For example, WHMs gain the opportunity to extend their travel, experience Australian culture, connect to communities and enhance their personal growth. Like other travellers to Australia, they will also become cultural ambassadors for Australia and ideally will encourage their friends and family to travel here as well. For regional employers, such an expansion would provide them with greater access to a flexible and diverse workforce helping to fill labour shortages.

Recognising the importance of the WHM program to travel and tourism, and to support the intention of the visa to facilitate travel throughout Australia, specified work should also allow WHMs to undertake all tourism and hospitality work across all non-metro regions in Australia. Expanding the opportunity to travel and work across all non-metro regions of Australia will enhance the regional dispersion of the WHM program, providing a valuable workforce along with the opportunity for WHMs to experience more of Australia. Importantly, this would also enable WHMs to contribute financially and culturally to more regional communities.

Finally, we would also like to see the post-code list for the 88-day requirement reviewed. This list is unnecessarily restrictive in some parts of Australia, and therefore does not reflect the genuine requirements of regional businesses, or the availability of WHM's seeking work.

Recommendations:

- The second- and third-year WHM visas and 88-day specified work requirement remain.

⁶ Department of Home Affairs (2023), [Working Holiday Maker visa program report](#), 31 December 2024, pg.4.

⁷ Ibid.

- Specified work required to qualify for second- and third-year WHM visas includes all employment undertaken in regional Australia.
- Specified work required to qualify for second- and third-year WHM visas includes tourism and hospitality work undertaken.
- The post-code list for the 88-day requirement be reviewed

However, if Government is contemplating a shift in policy settings in line with the Parkinson Review or other feedback received through this consultation process, there must be equivalent incentives introduced to encourage WHMs to continue to travel to and work in regional Australia. The lack of incentives to work in regional Australia will have a damaging impact on the workforce in these areas, the ability of businesses to operate, and for industries more broadly to function. As outlined above, a lack of incentives for WHMs to have a presence on regional Australia would have far-reaching consequences for the Australian economy more broadly.

Accordingly, the Chamber recommends a multi-pronged approach to incentivising WHMs to continue to work in the regions during their time in Australia if the 88-day requirement is removed.

First, there must be a financial incentive for WHM visa holders to work in regional Australia. Such an incentive could be the removal of the backpacker tax, which currently imposed on the first \$45,000 earned each year, when undertaking work in regional Australia. In this scenario, this would allow WHMs to earn more – if earning above \$45,000 a year – and may result in further spend in the visitor economy.

Second, WHM visa holders must complete specified work in regional Australia – either as currently provided for or expanded as recommended above. Ideally, this requirement would have a minimum time period attached however, noting concerns about the current period of 88 days, the Chamber appreciates that Government may be unwilling to impose such a requirement.

Finally, this work must be undertaken with an approved employer. This would need to be a registered employer, using the current registration process, that is not subject to any restrictions impeding their ability to deliver quality employment to WHMs. Such restrictions could include those imposed by recent measures introduced by the Migration Amendment (Strengthening Employer Compliance) Bill 2023 or the Fair Work Ombudsman, for example.

With any changes to the 88-day requirement or specified work taken forward by Government following this consultation, current arrangements must remain in place at a minimum, with a transition period implemented to support businesses to prepare appropriately for changing requirements.

Recommendations:

If removing the 88-day requirement:

- The following measures be put in place to incentivise WHM visa holders to travel and work in regional Australia:
 - Introduce financial incentives to support work in regional Australia, such as the removal of the backpacker tax;
 - Require that specified work be undertaken in regional Australia; and
 - Such work must be undertaken with an approved employer.

- Implement a transition period to support businesses to prepare for changing requirements.

Exploitation concerns

It is critical that all WHMs, especially those with English as a second language, have access to safe workplaces to complete specified work requirements to qualify for the WHM visa extension(s). Protecting WHMs from exploitation is crucial to ensure a positive and fair experience for these visa holders and to contribute to the overall attractiveness and sustainability of the program.

We do not believe that the removal of the 88-day requirement, nor the removal of the potential extension to WHM visas beyond the first year, will effectively stem any possible exploitation in a substantial manner. Further, if this requirement is removed, noting the significant costs incurred when travelling to regional Australia, it may have a detrimental impact on the viability of some regional Australian areas.

As part of its response to the Migration Strategy, the Government facilitated the passage and implementation of measures to target exploitation of temporary migrant workers. These measures, many contained within the Migration Amendment (Strengthening Employer Compliance) Bill 2023, have only commenced from 1 July 2024. Such measures, used in conjunction with the current register of WHM employers to flag employers that have non-compliances, could address the risk of exploitation in the WHM program.

While we appreciate and welcome the Government's initiative to tackle worker exploitation, particularly for migrant workers, it is also essential to consider the potential challenges and impacts on the Australian businesses we represent.

As such, we believe that there should be sufficient time provided for these measures to take effect to determine if they are strong enough to combat the unacceptable exploitation of migrant workers, or if there are further steps required. We would characterise further changes to include any alterations to the WHM program arrangements for specified work and would encourage any changes to these arrangements to be withheld until recently implemented measures are given time to operate.

However, there are mechanisms which may help to deliver a more positive and quality experience for WHMs during their time in Australia. For example, providing greater choice of working options as set out earlier in this submission will support the mobility of the workforce and will work to safeguard worker rights by reducing dependency on any single employer.

Further to these changes, there should be improved communication and provision of information for WHMs on their rights, in their preferred language. This could be done through the existing portal, ImmiAccount, or a separate resource, such as an app or a website. The provision of this information should be communicated in real time and, in addition to being in languages relevant to WHM partner countries and regions, must be easily accessible from regional areas. Such resources could also identify problematic employers in line with existing legislation.

Recommendations:

- Recently implemented measures to address temporary migrant worker exploitation should be allowed to operate, with their effectiveness reviewed after a reasonable period, prior to any changes to the WHM program on account of exploitation concerns.
- Improve communication with and the provision of information to WHM visa holders on their rights while working in Australia, as well as other relevant information in real time, through a portal or other accessible manner, in all languages of WHM partner countries and regions.

Eligibility

Following the pandemic, there has undoubtedly been a shift in working arrangements, not just here in Australia but around the globe. People are more willing – and enabled to – work away from the office, on their own time, in the digital realm. More and more workers are choosing to not work at all or take a break from their careers, and to travel more. These workers would make valuable contributions to Australia if permitted to access our WHM program.

To support these trends and potentially encourage more WHMs in the coming years, the Chamber recommends some adjustments to the eligibility for prospective applicants.

Firstly, the age limit for WHMs should be revised upwards to 40. With more and more people taking time out of their day-to-day to travel, either because their work enables this or because they were unable to do so during the pandemic, this may open the door to more prospective travellers who wish to travel around Australia for an extended period while earning money. Furthermore, unlike previous generations, there is an increasing tendency for younger generations to change jobs and careers and take breaks from working in their career altogether, seeking a new experience and more flexibility. The WHM program is well suited to these people and, by increasing the eligibility age by a modest five years, can appeal to more travellers – some of which may have more life experience as well.

Further, the Government should consider increasing the eligible age beyond this – to 45 or 50 – as more travellers adopt a digital nomad lifestyle.

Secondly, where a traveller has accessed Australia's WHM program prior to the age of 30, they should be enabled to use the program a second time. This should only occur where they have been outside of Australia for a minimum period, for example for four years. Reopening eligibility of the WHM program to these workers would bring additional experience to regional Australia – in age as well as those who have been in Australia on the program as well – and will broaden the number of prospective travellers who are able to contribute to the workforce, diversity and culture of these areas. While it may not deliver a substantial increase in uptake of WHM visas, any reasonable measures to support and alleviate labour shortages in regional Australia particularly should be adopted. This change may also allow for additional workers if the age limits of the WHM program are increased in line with our other recommendations.

Recommendations:

- Increase the age limit for WHM visas to 40 years of age. Consideration should be given to further increasing this to 45 or so years of age in coming years.
- Allow a second WHM visa for those who first used it before the age of 30 and have spent a minimum period outside of Australia.

Promotional activity

The WHM visa is a quality tourism product with a high marketability. The historic ability to attract a young and mobile workforce supported by WHMs is long-established. However, following the pandemic, workforce shortages have put additional strain on many regional travel and tourism operators.

We note that there are now 49 countries and regions Australia shares a WHM partnership with,⁸ and a further 13 under negotiation at 31 December 2023.⁹

While Tourism Australia currently undertakes specific marketing to countries and regions which Australia has WHM partnerships with, they must be supported to continue this work in a competitive global market. Inflationary cost pressures incurred where Tourism Australia operates overseas as well as media costs – estimated to have increased by up to 30 per cent – put its ability to market the benefits of our WHM program at risk. These funding pressures have meant that Australia’s tourism promotion footprint has been reduced. For example, in 2010, Tourism Australia operated in 35 markets, whereas we understand they now have a presence in only 15.

This marketing effort will be particularly important for the United Kingdom (UK), which have historically been the largest source location of WHMs. The removal of the requirement for UK WHMs to undertake work in regional Australia to qualify for second- and third-year WHM visas from 1 July 2024 has the potential to risk regional dispersal and labour availability in Australia.

To counteract the removal of this requirement, Tourism Australia should be supported to increase targeted marketing in the UK to potential WHMs, in addition to marketing targeted towards other potential source countries.

While this promotional activity is important, it is also important to ensure that policy settings align with and support Tourism Australia and industry research. Accordingly, Tourism Australia and the travel and tourism industry more broadly should have a greater influence on source and partnership countries, as well as any caps imposed, to reflect the tourism potential of different source markets. This influence would take into consideration the potential economic contribution of each country or region, determined through marketing research and trends, including the popularity of backpacking among relevant cohorts in these countries and regions.

Recommendations:

- Allocate an additional \$5 million per annum for three years from 2025-26 to Tourism Australia to undertake promotional activities encouraging prospective WHMs to travel and work in Australia.
- Additionally, support Tourism Australia to implement targeted marketing efforts to mitigate the impact of the recent changes to UK WHM visas.
- Facilitate opportunities for Tourism Australia and travel and tourism industry representatives to provide input into policy decision-making regarding priority WHM countries and any caps on WHMs.

Data collection and publication

⁸ Department of Home Affairs (2023), [Working Holiday Maker visa program report](#), 31 December 2024, pg.3.

⁹ Ibid, pg.6.

There is a lack of understanding outside of the travel and tourism industry about the importance of the WHM program to regional Australia, the visitor economy and the broader Australian economy. We note that recent commentary about migration levels has not assisted in promoting the importance of migrants, of which WHMs are a core component.

As Government considers changes to strengthen the WHM program, we believe there should be regularly published data on their contribution to the economy. Such data could also support the identification of growth opportunities and, potentially, areas of concern for WHM visa holders. We believe making this data more publicly accessible will also improve the social licence of this cohort of travellers.

As WHMs are crucial to the success of the domestic travel and tourism industry, it would be sensible for Tourism Research Australia (TRA), which operates from the Australian Trade and Investment Commission (Austrade), to undertake this work. TRA regularly publishes data and analysis on travel and tourism, including domestic and international mobility, as well as visitor economy statistics. More recently, TRA have been supported to analyse and publish data on business events and their contribution to the Australian economy.

The publication of this data should be in addition to the bi-annual WHM program reports published by the Department of Home Affairs.

Recommendation:

Provide appropriate support to Tourism Research Australia (TRA) to capture and analyse WHM data to assist in identifying growth opportunities for this cohort.

About Australian Chamber – Tourism

Australian Chamber – Tourism is a peak body representing Australian businesses engaged in the visitor economy. It brings together key participants in the tourism and travel sector to advocate better policies, including tax, regulation, tourism marketing, research, labour supply, visas and infrastructure. The Chamber is part of the Australian Chamber of Commerce and Industry, Australia's largest and most representative business network.

The Australian Chamber of Commerce and Industry 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.

ACCI 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.

Australian Chamber - Tourism Members





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