



AUSTRALIAN CHAMBER OF  
COMMERCE AND INDUSTRY



COMPETITION  
POLICY REVIEW:  
Response to Draft  
Report  
November 2014



# EXECUTIVE SUMMARY

The Australian Chamber of Commerce and Industry (ACCI) accepts that Australia's competition policy framework is in need of review and welcomes the opportunity to be involved in the Review process.

There are changes in Australia's policy landscape that warrant a review of competition policy. In particular, there is considerable overlap between workplace relations policy and competition policy. The introduction of the *Fair Work Act 2009* (FWA) and subsequent amendments has brought these two policy frameworks into apparent conflict. Transport policy is another area that overlaps with, and sometimes conflicts with, competition policy objectives.

The Review Panel is right to identify areas where regulations restrict competition and ask whether other means are available to achieve similar ends. The Review Panel has also identified that governments that engage in commercial transactions should also be subject to the same competitive disciplines the private sector faces.

It is pleasing that the Review Panel has provided draft recommendations to address all of these themes. Overall, the draft report provides a coherent plan for reform of Australia's competition policy framework.

ACCI made an initial submission to the Competition Policy Review Panel earlier this year. A significant number of the Review Panel's draft recommendations (DRs) were consistent with our stated positions.

The Review Panel also made a number a recommendations related to issues not canvassed in ACCI's initial submission. ACCI supports a number of these recommendations as well.

ACCI acknowledges that workplace relations reform is not directly addressed within scope of this review and that there are other forums which will provide the opportunity to recommend reform in this area. ACCI submits, however, that policy settings must be complimentary and a number of recommendations within the Draft Report would have greater effect if complimentary reform to the workplace relations framework occurred.

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# 1. BACKGROUND

The Australian Chamber of Commerce and Industry (ACCI) accepts that Australia's competition policy framework is in need of review given that the last serious examination occurred in the 1990s (the Hilmer Review). ACCI welcomes the opportunity to be involved in the Review process.

The current Review Panel identified three major forces for change that have progressed since the Hilmer Review. These are, the industrialisation of Asia and a growing Asian middle class; the ageing of the Australian population and the prospect of falling workforce participation; and the diffusion of digital technologies.

The *Competition and Consumer Act 2010* (CCA) has undergone some changes since the Hilmer Review, but a systematic review is overdue. There are also other changes in Australia's policy landscape that warrant a review of competition policy. In particular, there is considerable overlap between workplace relations policy and competition policy. The introduction of the *Fair Work Act 2009* (FWA) and subsequent amendments has brought these two policy frameworks into apparent conflict. Transport policy is another area that overlaps with, and sometimes conflicts with, competition policy objectives. ACCI regards resolution of these apparent conflicts as an essential outcome of the Review.

There are some aspects of our competition laws that artificially restrict competition. The Review Panel is right to identify these and ask whether other means are available to achieve similar ends. If so, these should be viewed as potential ways to streamline the current legislative framework.

Finally, the Review Panel has identified that governments that engage in commercial transactions should also be subject to the same competitive disciplines the private sector faces. Ultimately, this is about providing the best outcomes for consumers of government services and ensures that businesses that interact with government do not face a competitive disadvantage. Applying competition policy principles to the public sector will ensure that our government services are as efficient and effective as possible.

It is pleasing that the Review Panel has provided draft recommendations to address all of these themes. Overall, the draft report provides a coherent plan for reform of Australia's competition policy framework. ACCI made an initial submission to the Competition Policy Review Panel earlier this year. In our submission, we made 25 recommendations.<sup>1</sup>

A significant number of the Review Panel's draft recommendations (DRs) were consistent with our stated positions. The DRs that relate to these stated positions are discussed in section 2.1. The Review Panel also made a number a recommendations related to issues not canvassed in ACCI's initial submission. Where

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<sup>1</sup> Australian Chamber of Commerce and Industry (June 2014) *Submission to Competition Policy Review*, <http://competitionpolicyreview.gov.au/files/2014/07/ACCI.pdf>

ACCI has views on DRs that we did not canvass in our initial submission, these are covered in section 2.2.

ACCI acknowledges that workplace relations reform is not directly addressed within scope of this review and that the Government has committed to a Productivity Commission Review of the Workplace Relations Framework which will provide opportunity to ventilate recommendations for reform in this area. ACCI submits, however, that policy settings must be complimentary and a number of recommendations within the Draft Report would have greater effect if complimentary reform to the workplace relations framework occurred. By way of example, the Draft Report makes the following draft recommendation:

***Draft Recommendation 51 — Retail trading hours***

*The Panel notes the generally beneficial effect for consumers of deregulation of retail trading hours to date and the growth of online competition in some retail markets. The Panel recommends that remaining restrictions on retail trading hours be removed. To the extent that jurisdictions choose to retain restrictions, these should be strictly limited to Christmas Day, Good Friday and the morning of ANZAC Day.*

DR 51 is made in recognition that remaining restrictions on trading hours in the retail sector create a regulatory impediment to competition and that full deregulation of retail trading hours is overdue. However the regulation of trading hours also occurs within the workplace relations framework through imposition of provisions and penalty rates that limit flexibility and restrict the capacity of businesses to trade and/or run optimal staffing levels at certain times (such as weekends and public holidays). It is in the interests of competitiveness that restrictive provisions within employment regulation be removed to ensure widened choice, flexibility and greater competition within the marketplace for the benefit of consumers, business, employees and job seekers. Employers and employees should also be provided with the choice to negotiate workplace arrangements of mutual benefit and changes to the framework to support this outcome. ACCI intends to make detailed submissions once the Productivity Commission review commences.

## 2. ACCI POSITIONS ON DRAFT REPORT RECOMMENDATIONS

### 2.1 ACCI positions outlined in initial submission

#### 2.1.1 Small business, regulation and competition

1. ACCI recommends that all new regulation should be introduced with a Regulation Impact Statement, which includes a cost benefit analysis that cannot be ignored by Government.

**Comment:**

DR1 states that one of the key principles underpinning competition policy should be:

- ‘legislative frameworks and government policies binding the public or private sectors should not restrict competition’.

The Panel recommends that the principle should apply unless the costs outweigh benefits and any legislation or government policy restricting competition must demonstrate that:

- it is in the public interest; and
- the objectives of the legislation or government policy can only be achieved by restricting competition.

ACCI believes that DR1 addresses this concern and the *Australian Government Guide to Regulation* can easily be amended to take this principle into account.

DR11 also addresses this concern by recommending that there be a requirement for all Australian jurisdictions review existing regulations to examine whether they restrict competition. If existing regulations are found to have done so, DR11 also recommends that those regulations be removed unless jurisdictions can meet the two criteria from DR1 outlined above. ACCI also supports DR11.

## 2.1.2 Small business and access to justice

2. ACCI recommends an investigation into the ways in which access to quality information and justice can be achieved, especially for small business. This could be through the appointment of a Small Business and Family Enterprise Ombudsman, however, ACCI strongly argues that adequate resourcing requirements should be allocated to ensure its proper functioning.

### **Comment:**

DR49 recommends that the ACCC should take a more active approach in connecting small business to alternative dispute resolution mechanisms where it considers complaints have merit but are not a priority for public enforcement. The Review Panel invites views on whether there should be a specific dispute resolution scheme for small business matters covered by the CCA.

ACCI notes that the government has committed to the establishment of the Small Business and Family Enterprise Ombudsman (SBFEO) which will act as a concierge for existing dispute-resolution services and will offer limited alternative dispute resolution (ADR) services where none currently exist. The establishment of the SBFEO largely deals with this issue.

DR45 recommends that the ACCC should retain competition and consumer functions as a single entity. ACCI advocates that DR45 be redrafted to make explicit the functions of the SBFEO and their relationship to the ACCC. The relationship of the SBFEO to the ACCC, however, is unclear.

In our submission to the Minister for Small Business regarding the establishment of the SBFEO, ACCI recommended that the Ombudsman should be appointed as a Statutory Officer.<sup>2</sup>

The Review Panel also recommends as part of DR49 that the ACCC should be properly resourced to test the law on a regular basis to assure small business that the law is being enforced. This would also presumably act as a deterrent to unlawful behaviour. ACCI supports this part of DR49.

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<sup>2</sup> ACCI, (May 2014) *Submission to Minister for Small Business: Small Business and Family Enterprise Ombudsman*, <http://www.acci.asn.au/getattachment/b2e9879b-094d-49c4-8f8c-df8d3efa90b9/Small-Business-and-Family-Enterprise-Ombudsman.aspx>

## 2.1.3 Access to finance

3. ACCI recommends that the Reserve Bank conduct and publish a quarterly credit conditions survey on banks and non-banks to access the trends and developments in credit conditions for households and businesses.
4. A review of the provisions cited in both the Mortgage Common Provision and Corporations Act, with regard to enabling 'calling in loans' should be undertaken.

### **Comment:**

The Review Panel does not canvass any options nor make any direct recommendations to improve small business access to finance.

ACCI believes that DR 39 and DR40 in relation to the establishment and role of the Australian Council for Competition Policy, along with DR41, DR42 and DR43 in relation to market studies and annual competition analysis provide an avenue to assess credit conditions for households and businesses, although we retain our preference for a quarterly survey of credit conditions. ACCI supports these DRs.

At the time of writing this submission, ACCI had made a submission to a Treasury consultation on the implementation of unfair contract term (UCT) protections for small business. In that submission, ACCI argued for financial services to be included in any such regime. ACCI believes that this is the appropriate vehicle to address concerns around calling in loans.

## 2.1.4 Coastal shipping reform

5. ACCI recommends the contestability rights of General License holders should be removed from the Coastal Trading Act (CTA). Cabotage restrictions should be removed in line with Option 2, as presented by the Australian Government's Options Paper<sup>3</sup> which states:

*Remove all regulations of access to Coastal Trading and enact legislation to deal with the effects of other Australian laws.*

### **Comment:**

DR5 addresses this concern. ACCI supports DR5.

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<sup>3</sup> Australian Government. *Options Paper: Approaches to regulating coastal shipping in Australia*. April 2014.

## 2.1.5 Part Ten (X): International Liner Cargo Shipping

6. ACCI recommends that Part Ten (X) of the CCA should be repealed on the basis it predicates anti-competitive conduct amongst international liner cargo shipping.

**Comment:**

DR4 addresses this concern. ACCI supports DR4.

## 2.1.6 Parallel imports

7. ACCI recommends a review of the enforcement requirements associated with parallel importing.

**Comment:**

DR9 relates to parallel import restrictions. As noted by the Review Panel, parallel import restrictions can act as de facto trade barriers and can suppress competition beyond what is necessary to protect intellectual property. In any case, given the rapidly changing nature of technology many of these restrictions can be overcome directly by consumers. To the extent that products are homogenous, ACCI supports removal of parallel import restrictions as per DR9.

However, for food and formulated chemical-based products (for example, household chemicals and cosmetics), international manufacturers may essentially sell different products in different parts of the world under the same label. Subject to a review of enforcement requirements, ACCI does not object to removal of parallel import restrictions if other effective means of addressing these issues are available that do not restrict competition.

## 2.1.7 Competitive Neutrality

8. ACCI recommends a review of the competitive neutrality principles, which also considers the role of incentive payments and the type of provisions put in place to enforce said principles.
9. The existence of the competitive neutrality principles should also be better publicised to businesses so they are aware of their rights.

**Comment:**

DR13, DR14 and DR15 directly address competitive neutrality policy, complaints and reporting. ACCI supports these DRs.

DR39 and DR41 recommend the creation of an Australian Council for Competition Policy (ACCP) to replace the National Competition Council (NCC) as a broad advocate for competition policy in Australia. ACCI supports the creation of an ACCP.

DR44 recommends that the new ACCP would be responsible for assessing reform efforts of State governments so incentive payments can be made to compensate states for disproportionate effects across jurisdictions. This would presumably apply to reforms around competitive neutrality. ACCI supports the ACCP being granted powers to assess reform efforts and recommend incentive payments to states.

## 2.1.8 Secondary Boycotts

10. ACCI recommends that the ACCC provides transparent and consistent reporting with respect to its enforcement activities involving secondary boycotts. This should include, but not be limited to, clear, consistent and comparative reporting about:
  - All complaints and enquiries received;
  - Assessments commenced (and concluded);
  - Investigations undertaken (whether at their own initiative or otherwise);
  - Undertakings made; and
  - Litigation commenced (and concluded).
11. ACCI recommends that approximately one year after the abovementioned transparency mechanisms have been in operation, a further review should be conducted which in light of additional information invites stakeholders to provide comment about whether the provisions of the CCA are actually operating effectively.
12. ACCI recommends that the ACCC be mandated to give a firm commitment to enforcing the secondary boycott provisions which is ideally more authoritative than a policy statement as is currently the case.
13. ACCI recommends the Government should give consideration to providing the ACCC with an additional budget apportionment for the purposes of enforcing the secondary boycott provisions of the CCA.
14. ACCI recommends that the legislative framework for the secondary boycott provisions should be simplified, or failing that, the Government should give consideration to providing the ACCC with funding to formulate information tools and/or educate individuals, particularly small businesses, about the relevant provisions;
15. ACCI recommends that the Cole Royal Commission Report recommendations 181 and 182 be adopted, but consideration should be given to:
  - Simplifying the provisions (including removing the 'dominant purpose' test under section 45DD(1) of the CCA) whilst ensuring that there is harmonisation of penalties and compensation, and that the Fair Work Building and Construction (FWBC)/ Australian Building and Construction Commission (ABCC) possesses the same powers as the ACCC;
  - Requiring a reverse onus of proof for unions alleged to have engaged in such conduct; and

- Developing a formal Investigation and Prosecution Cooperation Protocol to guide the functions of the FWBC/ABCC and ACCC, particularly in circumstances where both bodies may be investigating the same matter;
16. ACCI recommends that in the interests of small business, a separate procedure for small business claims should be considered.
  17. ACCI recommends there should be a positive obligation to report secondary boycott behaviour including circumstances in which an individual is approached by another individual requesting that an agreement, arrangement or understanding is reached in contravention of sections 45D and 45E of the CCA.

**Comment:**

DR 31 of the Draft Report aligns well with the transparency mechanisms recommended by ACCI in its initial submission and as repeated in recommendations above. However ACCI recommends that further consideration be given to allocation of resources to support more frequent and timely reporting that is not limited to the annual reporting process.

ACCI agrees with the observation made at page 50 of the report that “[t]imely and effective public enforcement serves as a deterrent to boycott activity, and needs to exist both in regulatory culture and capability”. More frequent and timely reporting in relation to enforcement activity will improve the effectiveness of reporting as a deterrent and will help ensure that the consequences of a breach of the secondary boycott laws are real and understood. Timely and more frequent reporting will also provide a means of measuring the progress of the ACCC in enhancing its approach to enforcement. Consistent with ACCI’s initial submission, ACCI recommends a review one year after implementation of the transparency mechanisms. Analysis of the reporting outcomes will enable an assessment of their effectiveness.

Reporting will also provide examples of wrongdoing and action taken to enable businesses to develop a better understanding of their rights when confronted with secondary boycotts.

DR 32 of the Report recommends that jurisdiction in respect of the prohibitions in sections 45D, 45DA, 45DB, 45E and 45EA should be extended to the state and territory Supreme Courts. ACCI supports this recommendation on the basis that it would enhance access to court enforcement channels. As noted, however, in our initial submission, ACCI recommends that in the interests of small business, a separate procedure for small business claims should be considered. ACCI recommends that an investigation into the ways in which access to quality information and justice for small business can be achieved and this also applies in the context of responding to breaches of the complex secondary boycott provisions. Businesses, regardless of size, must be empowered to take action to address unlawful conduct and education and access to justice play an important role in achieving such empowerment.

Access to relief will also be better achieved if the Fair Work Building and Construction (FWBC)/ Australian Building and Construction Commission (ABCC) possess the same investigative and enforcement powers as the ACCC as was recommended by the Cole Royal Commission.

While ACCI is supportive of the two recommendations adopted in the Draft Report in relation to secondary boycotts, reform must extend beyond this. ACCI encourages the Panel to consider the balance of ACCI's recommendations as repeated above for the reasons set out in ACCI's initial submission.

## 2.1.9 Anti-competitive Agreements

1. ACCI recommends a legislative amendment to the CCA which prohibits enterprise agreements from containing terms which restrict the engagement of contractors.
2. As an alternative, (and preferred) proposal, ACCI recommends that the *Fair Work Act* (FW Act) is amended to prohibit enterprise agreements from restricting the engagement of contractors. This outcome could be achieved by:
  - Amending the definition of 'permitted matters' under section 172 of the FW Act so that the terms of enterprise agreements are strictly limited to matters pertaining to the employment relationship; and
  - Tightening the list of 'unlawful terms' contained in section 194 of the FW Act to make it clear that unlawful matters include matters which are not "permitted matters" and in particular terms which seek to restrict the engagement of contractors.

### **Comment:**

ACCI notes that Panel has invited further submissions relating to industrial conduct which attempts to restrict the engagement of independent contractors. ACCI notes that the Panel favours competition over restrictions and believes that businesses should generally be free to supply goods and services, including contract labour, if they choose. ACCI's initial submission recommends legislative amendment to the CCA prohibiting enterprise agreements from containing terms which restrict the engagement of contractors on the basis that such legislative amendment would align with the objectives of the CCA by enhancing competitiveness. ACCI also highlighted that such amendment would need to be carefully considered.

ACCI notes that section 51(2)(a) of the CC Act exempts from Part IV of the Act, except from its secondary boycott provisions, contracts, arrangements or understandings relating to remuneration, conditions of employment, hours of work and working conditions of employees. This reflects the notion that workplace and commercial law should be delineated and, as a broad proposition, ACCI supports the sentiments of Master Builders Australia at paragraph 7.19 of its 28 May 2014 submission which calls for "clear separation of commercial and workplace law" so "that the regulation of contracts for services should be covered by the CCA and the

regulation of independent contractors should be excluded from the terms of the FW Act”.

Notwithstanding this, ACCI believes amendment of the CCA warrants serious consideration because the prospect of necessary reform of the FW Act in the short term is unlikely. ACCI notes that some other interested parties have previously made some specific recommendations regarding the qualification of this exception which may warrant consideration. For example, the Hon. John Lloyd PSM has made the following recommendation in his June 2014 submission:

*Recommendation: The Competition and Consumer Act 2010 be amended to make unlawful the practice of imposing restrictions on the use of contracting and labour hire services through industrial agreements and associated arrangements. The exemption provided in S51(2)(a) should be qualified along the following lines: “The exemption does not apply to a contract, arrangement, understanding or industrial agreement between an employer, union and employees that restricts dealings or lessens competition through limiting the employer’s capacity to engage contractors and labour hire firms.”<sup>4</sup>*

Such reforms would be complimented by measures such as those set out in DR 33.

Restrictions on legitimate, productive and flexible forms of labour engagement cannot be sustained and urgent action is required to address these anti-competitive practices. The future inclusion of clear provisions in the *Fair Work Act 2009* rendering clauses within enterprise agreements unlawful and unenforceable to the extent that they deal with restrictions on the engagement of independent contractors and requirements relating to the conditions of their engagement may alleviate the need for revisions of the nature described above. However given the significant deficiencies in the *Fair Work Act 2009* in its current form that are unlikely to be addressed by the Government during this parliamentary term, serious consideration should be given to addressing these restrictions now through the CCA by adopting the above recommendations, which align to the CCA’s primary object to **‘enhance the welfare of Australians through the promotion of competition and fair trading and provision for consumer protection’**.

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<sup>4</sup> Lloyd, J. (June 2014) *Submission to the Competition Policy Review*, [http://competitionpolicyreview.gov.au/files/2014/06/Lloyd\\_J.pdf](http://competitionpolicyreview.gov.au/files/2014/06/Lloyd_J.pdf)

## 2.1.10 Transfer of Business

3. ACCI recommends that the existing transfer of business rules should be re-aligned with the former longstanding provisions and there should be a maximum time limit for transferring industrial instruments.<sup>5</sup>

### **Comment:**

ACCI restates its position that the *Fair Work Act 2009* provisions relating to transfer of business are anti-competitive and strongly encourages the Panel to make recommendation for reinstatement of the transmission of business provisions under the *Workplace Relations Act 1996 (Cth)* in existence prior to the FW Act which were balanced, workable and did not act as a major disincentive for incoming employers to not take on existing staff when a business or part of a business, was acquired.

## 2.1.11 Section 46 – ‘Take advantage’ aspect

18. ACCI recommends the ‘take advantage’ aspect of section 46 should to be amended to better define the application of the ‘take advantage’ statement, which would ensure clarity and its enforceability.

### **Comment:**

DR25 canvasses changes to section 46 of the CCA and goes beyond what ACCI recommended in our initial submission to the Review Panel. ACCI conditionally supports DR25, which would entail the adoption of an ‘effects’ based test that focuses on protecting competition, not competitors.

ACCI supports DR25 if either of the following two conditions are met:

- the predatory pricing amendment of 2007 is removed entirely OR
- section 46 is simplified by removing any reference to ‘substantial share of a market’ in subsections 1AA and 1AB plus repeal of subsection 1A – this would ensure section 46 only referred to ‘substantial degree of power in a market’.

ACCI supports the proposed defence in DR25 as being appropriate, but notes that considerable uncertainty may result until the new defence is tested in the courts.

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<sup>5</sup> See p.16 of *ACCI Submission: Inquiry into the Fair Work Act 2009: Australian Government Discussion Paper*

## 2.1.12 Education reform

19. ACCI recommends that the current Commonwealth funded *MySkills* website should be resourced appropriately to ensure that training consumers have access to the full range of information on quality and employment outcomes of training providers.
20. ACCI recommends current careers advice resources, such as the *MyFuture* website should be resourced appropriately to ensure that training consumers have access to industry relevant careers advice and information on skills in demand across the Australian labour market.
21. ACCI recommends service providers servicing NDIS clients must have clear guidelines and service standards to ensure that clients receive the most appropriate services tailored to their condition.

### **Comment:**

The Review Panel did not make any direct recommendations on these issues. DR2, however, recommends general principles that should apply, not just to the abovementioned services, but to all human services more broadly. ACCI supports the development and implementation of an intergovernmental agreement establishing choice and competition principles in the field of human services. ACCI also supports the development of implementation plans in each jurisdiction with measurable, binding key performance indicators. ACCI supports DR2.

## 2.1.13 Australian Competition and Consumer Commission – Market Studies

22. ACCI recommends that the Australian Competition and Consumer Commission (ACCC) be empowered to undertake market studies, allowing the Commission to investigate a sector where there is a notified, potential problem in the market. The associated report should be presented to Parliament with the necessary recommendations.

### **Comment:**

As noted above in section 2.1.7, DR39, DR40 and DR41 recommend the creation of an Australian Council for Competition Policy (ACCP) that would be granted the power to undertake competition studies of markets in Australia. As noted above, ACCI supports the establishment of an ACCP.

ACCI recommended in our initial submission that the ACCC be granted the power to conduct market studies. If the government were to create an ACCP, granting these powers to the ACCP instead of the ACCC would represent a sensible step. In that case, ACCI supports these powers being granted to the ACCP. ACCI also supports the ACCP being granted similar data collection powers to those granted to the Productivity Commission.

## 2.2 Other Draft Report recommendations not covered in initial submission

ACCI supports the following DRs:

- DR18 — Competition law simplification
- DR19 — Application of the law to government activities
- DR20 — Definition of market
- DR21 — Extra-territorial reach of the law
- DR26 — Price discrimination
- DR27 — Third-line forcing test
- DR51 — Retail trading hours

ACCI also supports DR6 subject to reasonable compensation being paid to affected small businesses where regulations to restrict competition in the taxi industry are removed. Governments should only play a role in regulating taxis where there are concerns around the protection of public safety. It is unnecessary to restrict competition to achieve this aim.

## 3. ABOUT ACCI

### 3.1 Who We Are

The Australian Chamber of Commerce and Industry (ACCI) speaks on behalf of Australian business at a national and international level.

Australia's largest and most representative business advocate, ACCI develops and advocates policies that are in the best interests of Australian business, economy and community.

We achieve this through the collaborative action of our national member network which comprises:

- All eight state and territory chambers of commerce
- 29 national industry associations
- Bilateral and multilateral business organisations.

In this way, ACCI provides leadership for more than 300,000 businesses which:

- Operate in all industry sectors
- Includes small, medium and large businesses
- Are located throughout metropolitan and regional Australia.

### 3.2 What We Do

ACCI takes a leading role in advocating the views of Australian business to public policy decision makers and influencers including:

- Federal Government Ministers & Shadow Ministers
- Federal Parliamentarians
- Policy Advisors
- Commonwealth Public Servants
- Regulatory Authorities
- Federal Government Agencies.

Our objective is to ensure that the voice of Australian businesses is heard, whether they are one of the top 100 Australian companies or a small sole trader.

Our specific activities include:

- Representation and advocacy to Governments, parliaments, tribunals and policy makers both domestically and internationally;
- Business representation on a range of statutory and business boards and committees;
- Representing business in national forums including the Fair Work Commission, Safe Work Australia and many other bodies associated with economics, taxation, sustainability, small business, superannuation, employment, education and training, migration, trade, workplace relations and occupational health and safety;
- Representing business in international and global forums including the International Labour Organisation, International Organisation of Employers, International Chamber of Commerce, Business and Industry Advisory Committee to the Organisation for Economic Co-operation and Development, Confederation of Asia-Pacific Chambers of Commerce and Industry and Confederation of Asia-Pacific Employers;
- Research and policy development on issues concerning Australian business;
- The publication of leading business surveys and other information products; and
- Providing forums for collective discussion amongst businesses on matters of law and policy.

# ACCI MEMBERS

**ACCI CHAMBER MEMBERS:** ACT AND REGION CHAMBER OF COMMERCE & INDUSTRY **BUSINESS SA** CHAMBER OF COMMERCE NORTHERN TERRITORY **CHAMBER OF COMMERCE & INDUSTRY QUEENSLAND** CHAMBER OF COMMERCE & INDUSTRY WESTERN AUSTRALIA **NEW SOUTH WALES BUSINESS CHAMBER** TASMANIAN CHAMBER OF COMMERCE & INDUSTRY **VICTORIAN EMPLOYERS' CHAMBER OF COMMERCE & INDUSTRY** **ACCI MEMBER NATIONAL INDUSTRY ASSOCIATIONS:** ACCORD – HYGIENE, COSMETIC AND SPECIALTY PRODUCTS INDUSTRY **AIR CONDITIONING & MECHANICAL CONTRACTORS' ASSOCIATION** AUSTRALIAN BEVERAGES COUNCIL **AUSTRALIAN DENTAL INDUSTRY ASSOCIATION** AUSTRALIAN FEDERATION OF EMPLOYERS & INDUSTRIES **AUSTRALIAN FOOD & GROCERY COUNCIL ASSOCIATION** AUSTRALIAN HOTELS ASSOCIATION **AUSTRALIAN INTERNATIONAL AIRLINES OPERATIONS GROUP** AUSTRALIAN MADE CAMPAIGN LIMITED **AUSTRALIAN MINES & METALS ASSOCIATION** AUSTRALIAN PAINT MANUFACTURERS' FEDERATION **AUSTRALIAN RETAILERS' ASSOCIATION** AUSTRALIAN SELF MEDICATION INDUSTRY **BUS INDUSTRY CONFEDERATION** CONSULT AUSTRALIA **HOUSING INDUSTRY ASSOCIATION** LIVE PERFORMANCE AUSTRALIA **MASTER BUILDERS AUSTRALIA** MASTER PLUMBERS' & MECHANICAL SERVICES ASSOCIATION OF AUSTRALIA (THE) **NATIONAL BAKING INDUSTRY ASSOCIATION** NATIONAL ELECTRICAL & COMMUNICATIONS ASSOCIATION **NATIONAL FIRE INDUSTRY ASSOCIATION** NATIONAL RETAIL ASSOCIATION **OIL INDUSTRY INDUSTRIAL ASSOCIATION** PHARMACY GUILD OF AUSTRALIA **PLASTICS & CHEMICALS INDUSTRIES ASSOCIATION** PRINTING INDUSTRIES ASSOCIATION OF AUSTRALIA **RESTAURANT & CATERING AUSTRALIA** VICTORIAN AUTOMOBILE CHAMBER OF COMMERCE