ACCI POST-BUDGET SUBMISSION

FAIR WORK COMMISSION
2013 Annual Wage Review

MAY 2013
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1. ABOUT ACCI

1.1 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 state and territory chambers of commerce
- 30 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

1.2 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;
- 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.
2. INTRODUCTION

The Australian Chamber of Commerce and Industry (ACCI) welcomes the opportunity to provide this brief post-budget submission to the Fair Work Commission as part of the 2013 Annual Wage Review. It should be read in conjunction with ACCI’s primary and reply written submissions.

These submissions are without prejudice to ACCI or ACCI members’ further consideration of these matters.

ACCI may expand upon these submissions in reply at the consultations in Melbourne.
3. OVERVIEW

**Summary and main points**

Economic growth is forecast to ease to below trend in the coming financial year and trade-exposed sectors are expected to remain under pressure.

Employment growth is forecast to remain modest leading to a further deterioration in labour market conditions.

The Budget provides no funding to business for the planned staged increase in the superannuation guarantee from 9 to 12 per cent.

The Budget imposes a range of new taxes and charges on business that increase their cost base and limit their capacity to invest and employ.
4. GROWTH FORECASTS

Expectations for economic growth have been revised down to below trend in 2013-14. Treasury estimate that the economy will expand by 3 per cent in 2012-13, in line with expectations in the *Mid-Year Economic and Fiscal Outlook* (MYEFO). However, economic growth in 2013-14 is forecast to ease to 2 ¾ per cent. This represents a −¼ percentage point downward revision to expectations at MYEFO and reflects a weaker outlook for business investment. Economic growth is seen picking up in 2014-15 to 3 per cent, consistent with its long-term trend pace of expansion.

*Treasury Real GDP Growth Forecast*

Growth in the Australian economy is continuing to be underpinned by a huge upswing in mining sector investment. The necessary counterpart to strong expansion in the resource industry has been modest growth in the non-mining sectors of the economy. As the peak in mining sector investment approaches, growth will need to become more broadly-based in order to sustain the overall pace of economic growth. Treasury forecast that this is likely to occur, though they warn that “this transition may not be seamless”\(^1\).

Against the backdrop of a fragile global recovery, the Australian economy is expected to undergo two large and

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important transitions over the forecast period. Following the largest investment boom in Australia’s history, the resources boom will transition away from the investment phase towards exceptional growth in production and exports. More broadly, the Australian economy will transition to non-resources drivers of growth.\(^2\)

Business investment has been the dominant driver of economic growth in recent years, underpinned by a rapid expansion in mining sector investment. Business investment posted very strong growth of +20.8 per cent in 2011-12, contributing +3.2 ppts to the growth of +3.4 per cent recorded in that year. Treasury estimate that business investment will increase by a further 10 ½ per cent in 2012-13, with the pace of growth easing markedly over its two-year forecast horizon as resource sector investment peaks and falls away.

Resources investment is expected to peak in 2013-14 at record highs, and then remain elevated through to at least the middle of the decade.\(^3\)

Comparatively modest growth in business investment of 4 ½ per cent is forecast for 2013-14 and a small rise of 1 per cent is expected in 2014-15. These forecasts rely upon a pick-up in non-resource sector investment to offset the drag on growth from the mining sector once investment peaks in that industry. Treasury highlight that conditions in the non-mining sectors of the economy remain difficult, with the value of the Australian dollar imposing particular pressures on trade-exposed industries.

However, in the near term, economic growth outside the resources sector will continue to face some headwinds, and conditions are expected to remain uneven across the economy. This partly reflects the magnitude of the transition underway, but also structural challenges — such as the persistently high Australian dollar — which are weighing heavily on a number of sectors.

…

While the strength of the Australian dollar reflects the fundamental strength of the Australian economy, the persistently high dollar is producing especially challenging conditions in labour intensive and trade-exposed sectors such as manufacturing and tourism. In the retail and wholesale trade sectors, consumer caution and changing spending

\(^2\) Ibid, page 2-3.
\(^3\) Ibid, page 2-5.
patterns have added to the competitive pressure to pass on lower import prices, which has squeezed profit margins.\(^4\)

Treasury anticipate that the Australian dollar will continue to present challenges for trade-exposed industries:

Outside the resources sector, measures of capacity utilisation have been subdued since the global financial crisis, while the Australian dollar has remained elevated, making conditions unusually challenging for firms operating in the trade-exposed sectors of the economy. In response to these pressures, firms have been absorbing costs rather than passing on higher prices, which has weighed on profitability. However, many firms are also adapting to these pressures by improving productivity and adjusting business models. These acute competitive pressures are expected to persist over the forecast period, and will continue to place downward pressure on prices and nominal GDP growth.$^5$

Despite a -16.5 per cent fall in the terms of trade since the September quarter 2011, the Australian dollar has largely maintained its value. The continued pressure on trade-exposed sectors of the economy resulting from the high value of the currency limits the capacity of businesses in these industries to sustain further artificial increases in costs as a result of the current Annual Wage Review.

The Budget papers highlight the extent of the pressure on trade-exposed industries:

Treasury’s business liaison program suggests that subdued profits in the non-resources sectors reflects competitive pressures from the sustained high Australian dollar, with firms absorbing costs by squeezing profit margins at the same time as they pass on lower import prices to consumers. Business survey data support the information from liaison, with margins particularly weak in manufacturing, wholesale, retail and construction.

While the dollar remains high, it will continue to place downward pressure on profits. Firms are innovating and adapting to manage this pressure, but the persistent strength in the Australian dollar is making the economic transition to

\(^4\) Ibid, page 2-6.
\(^5\) Ibid, page 2-8.
non-resources drivers of growth more challenging, particularly in the trade-exposed sectors.\textsuperscript{6}

There remain considerable risks to the economic outlook, principally stemming from the potential for another global financial crisis emanating from Europe, the effects of which would obviously be profound. Treasury state that:

The key international risk is the potential for a re-escalation of the euro area crisis, as highlighted by recent developments in Italy and Cyprus.\textsuperscript{7}

However, there are also risks stemming from the terms of trade and uncertainty about the transition to broader-based growth in the Australian economy:

Domestically, the transmission of volatility abroad to commodity prices presents a considerable risk to the forecast for nominal GDP growth. Australia’s own economic transition presents both upside and downside risks to the domestic outlook, but a key risk is that the transition to new drivers of growth will be less than seamless, with the persistently high Australian dollar weighing heavily on firms in the trade-exposed sectors of the economy.\textsuperscript{8}

ACCI submits that the continued uneven nature of economic growth, the lack of any guaranteed smooth transition to broader-based growth and ongoing pressures on trade-exposed sectors of the economy justify the Fair Work Commission taking a cautious approach to any increase in award rates of pay. Growth is expected to slow and the downside risks to the outlook from the external sector remain considerable.

5. LABOUR MARKET

Labour market conditions are forecast to deteriorate further. Treasury expect employment growth will continue to remain modest, leading to a further increase in the unemployment rate. The pace of job creation is estimated at only 1 ¼ per cent over the year to the June quarter 2013, which is expected to see the unemployment rate rise to 5 ½ per cent. Treasury forecast employment growth will remain modest, rising by 1 ¼ per cent through the year to the June quarter 2014 before accelerating slightly to 1 ½ per cent in 2015. Modest employment growth will see the unemployment rate rise to 5 ¾ per cent in the June quarter of 2014 and remain at that level in the June quarter of 2015.

\textsuperscript{6} Ibid, page 2-44.  
\textsuperscript{7} Ibid, page 2-9.  
\textsuperscript{8} Ibid, page 2-9.
Treasury’s labour market forecasts show the unemployment rate departing from “full employment” for an extended period and by a significant margin. Treasury consider an unemployment rate between 4 ¾ and 5 per cent to be consistent with “full employment”. The updated Budget forecasts show the unemployment rate exceeding the upper bound of this range by between ½ and ¾ of a percentage point for three years. This is not consistent with a strong labour market and in raw numbers represents roughly an additional 50,000 to 100,000 unemployed people over the forecast horizon. An excessive increase in award rates of pay will further limit the prospects of these individuals being able to secure employment and sufficient hours of work.

Treasury note that:

Employment growth has been modest over the past 12 months, reflecting the uneven conditions across the economy and the dampening effect of the persistently high Australian dollar on trade-exposed sectors.9

The elevated value of the Australian dollar is expected to negatively impact on employment opportunities in trade-exposed sectors:

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Employment growth is expected to remain moderate, at 1¼ per cent through the year to the June quarter 2014, with the persistently high dollar producing challenging conditions in some labour intensive sectors of the economy, such as manufacturing and tourism.\(^\text{10}\)

Wages growth is forecast to moderate in response to weaker labour market conditions. The year-end pace of growth in the wage price index is expected to slow to 3 ½ per cent in the June quarter of 2013, down -0.2 ppts from +3.7 per cent in the same period a year earlier. Wages growth is forecast to maintain this 3 ½ per cent pace through the year to the June quarters of both 2014 and 2015.

Moderate wages growth will see inflation remain well-contained and consistent with the Reserve Bank’s target band of 2 to 3 per cent. Inflation is expected to be 2 ½ per cent in the June quarter of 2013 and is forecast to slow to 2 ¼ per cent June 2014 and remain at this pace by mid-2015.

6. **POLICY DECISIONS**

The Budget announced policy measures that will increase the tax burden on Australian businesses and limit their capacity to invest and employ. Corporations will be subject to a range of new tax and compliance measures that are expected to raise $4.2bn over the forward estimates period. There are also a range of other new taxes and charges in the budget that collectively impose significant new costs.

ACCI remains concerned that the government has still not made provision for the necessary machinery for a wage superannuation trade off to fund the higher superannuation levy which will come into operation in the middle of 2013. ACCI reiterates that the Fair Work Commission is urged to take into consideration this new costs burden in this year’s Annual Wage Review.

7. **CONSULTATION QUESTIONS**

7.1 **Underemployment**

Award reliance does correlate positively with underemployment across industries. Research previously considered in the Annual Wage Review process reveals that

\(^{10}\) *Ibid*, page 2-36.
businesses often reduce the number of hours they offer employees as a result of increases in award rates of pay.

The Fair Work Commission is yet to properly consider the extent of the negative impact of the award system on underemployment.

7.2 Profits and wages share

Gross mixed income excludes the compensation of employees of unincorporated entities\(^{11}\). It is not equivalent to wage income, but instead represents a return to entrepreneurial activity.

The term 'mixed income' is used because the surplus arising from the productive activities of unincorporated enterprises can comprise returns to the capital of the proprietors (representing operating surplus), and an element akin to wages and salaries accruing to the proprietors or other members of the household as payment for their labour input to the enterprise (even though they may not receive explicit payment for their work).\(^{12}\)

While some element of gross mixed income represents a return to the labour of the business owner it is inappropriate to characterise this as wage income equivalent to the compensation of employees. Gross mixed income is included in the National Accounts because the Australian Bureau of Statistics (ABS) does not distinguish between the return to capital and labour of the business owner. The National Accounts do not directly measure either; rather they are “imputed”.

The labour and capital shares of income earned by unincorporated enterprises are subsumed into one national accounts aggregate: gross mixed income (GMI). The following procedure is used to impute labour and capital shares of this aggregate for each industry in the market sector.

An estimate of labour income is imputed by assuming that proprietors and unpaid helpers receive the same average compensation per hour as wage and salary earners. Similarly, an estimate of proprietors’ capital income is derived by multiplying the unincorporated productive capital stock of each asset type by the corporate rental prices. These


estimates are then scaled so they sum to the observed GMI. The capital and labour shares of GMI are the corresponding scaled estimates.\(^{13}\)

These estimates of the labour and profits shares of gross mixed income are used to construct indices of labour, capital and multi-factor productivity for the market sector. They are also used to construct experimental estimates of multi-factor productivity at the industry level.

It is not clear that the ACTU have adopted the sophisticated statistical techniques necessary to produce estimates of what they deem to be the labour share of gross mixed income. Indeed, the ACTU provides no details of the statistical methods it has employed in producing its uncorroborated estimate of the labour share of income. ACCI does not believe that the Fair Work Commission should be relying upon the unverifiable and potentially dubious estimates produced by the ACTU.

If the Commission believes that it is important to have reference to a labour share of income measure that includes an element of gross mixed income, then it should commission the ABS to produce such an estimate using their world’s best practice statistical methodologies. The fact that the ABS does not currently publish such an estimate should stand as further caution against relying upon the figures presented by the ACTU.

\[^{13}\text{Ibid, page 440.}\]

Labour and Capital Share of Income: Market Sector

Source: ABS Cat. No. 5260.0.55.002
The ABS does publish experimental estimates of the labour and capital shares of income for the market sector from the 1994-95 financial year until 2011-12. Those estimates differ considerably from the series produced by the ACTU in both their level and recent trend. The labour share of income in the market sector was 60.0 per cent in 1994-95 and largely tracked sideways until 2007-08, after which it fell to 56.0 per cent in 2008-09 and was estimated at 57.0 per cent in 2011-12.

ACCI maintains its opposition to reliance upon the ACTU measure of the wages share of national income. Conceptually it is a corruption of National Accounts identities, methodologically there is no basis for believing it has been appropriately calculated and it is inconsistent with the experiment estimate that the ABS has produced for the market sector.

ACCI will consider the balance of the consultation questions and may address them at the consultation hearing in Melbourne.
### 8. ACCI MEMBERS

#### CHAMBERS OF COMMERCE & INDUSTRY

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## NATIONAL INDUSTRY ASSOCIATIONS

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<th>National Industry Associations</th>
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<td><strong>AGRIBUSINESS EMPLOYERS’ FEDERATION</strong></td>
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