



Paid Parental Leave: Support for Parents with Newborn Children

NFAW précis of the draft report by the Productivity Commission

Introduction

1. The Productivity Commission was asked by the Federal Government in February 2008 to undertake a public inquiry into paid maternity, paternity and paternal leave, reporting by February 2009. The Commission put out a background paper in April 2008, followed by a round of hearings and submissions.
2. The draft report was released on 30 September for public comment. It can be found on the internet at <http://www.pc.gov.au/projects/inquiry/parentalsupport/draft>. The closing date for responses is 14 November, e-mail parentalsupport@pc.gov.au. The Commission will hold public hearings starting on 10 November.
3. The National Foundation for Australia Women (NFAW) with Security for Women (S4W), with the support of the Commonwealth Office for Women, is also holding consultations in each State during October and early November of 2008: see schedule below and contacts. The objective is to encourage women to respond to the draft report in the form of submissions to the Productivity Commission.
 - a. 16 October, Brisbane – jenc@qwws.org.au
 - b. 20 October, Darwin – admin@ntwwc.com.au
 - c. 23 October, Perth – owp@communities.wa.gov.au
 - d. 27 October, Sydney – a.page@econ.usyd.edu.au
 - e. 5 November, Melbourne – inforequests@wire.org.au
 - f. 7 November, Adelaide – sandra@wwc.org.au
 - g. 12 November, Canberra – women@act.gov.au
 - h. 10 November, Hobart – wt.admin@dpac.tas.gov.au
4. The Commission will then produce a final report by February. At that point the Government will consider what its response will be. The Commission's report does not commit the Government to a course of action, but will be politically very influential.

Objectives

5. The Commission accepted the following objectives:
 - a. Enhancing maternal and child health and development;
 - b. Facilitating workforce participation;
 - c. The expression of emerging community norms that taking time away from the paid workforce to care for an infant is a normal part of life and work for many people, including fathers, and should be explicitly recognised.
6. The Commission accepted that at least six months parental care is in the best interests of mothers and babies, but expected that families should shoulder the cost of time that was not met by the proposed scheme.

7. The Commission envisages the scheme as a workforce related program, and to be differentiated from a welfare program. It wants employers who already pay parental leave to continue to do so.

Recommendations

8. Recommendations are set out in full in Appendix A.
9. In summary, the Federal Government would provide:
 - a. 18 weeks payment at the Federal adult minimum wage: \$543.78 a week, or \$9788, to the mother, if she was eligible.
 - i. Adult part-time workers whose weekly earnings had been less than \$543.78 a week would also be eligible for the full amount, along with other workers. Juniors and others paid under the federal minimum hourly wage, would receive proportionately less.
 - ii. The Baby Bonus, \$5000 and Family Tax Benefit Part B, (\$1159.20 over 18 weeks) would be rolled in, so the proposal provides an additional \$3629 over current support.
 - iii. The mother could reallocate all or part of the payment and leave period to the father or partner, if that person took on primary care for the child.
 - iv. The leave would be taxable, and included in income assessment for social security payments.
 - b. An extra 2 weeks paternity leave is available exclusively for the father/partner, whether or not the mother had been employed or eligible. This can be taken at the same time as the mother's leave.
 - c. Payment can start on the day of the birth or within six months, must be taken after any other paid leave, and must be taken in one block (except for up to 10 days allowable work).
 - d. Parents would be eligible if they are the primary carer of the child, and had been employed continuously for 12 months, for an average 10 hours a week or more, before the expected date of birth.
 - i. This does not need to be with the same employer;
 - ii. Casuals, self employed and contractors would be included
 - iii. this is a broader group than those eligible for 12 months *unpaid* leave with a right to return to work.
 - e. Employers would pay super at 9% of the payment or the employee's normal wages, whichever is less.
 - f. The payment would be made by the employer (in most cases) and reimbursed by Government
 - g. Payment would cover non-family adoptions and stillbirths. For multiple births an extra \$5000 would be paid for each extra baby.
 - h. Parents who had not been employed before the birth or did not meet the work test would still receive a payment equivalent to the Baby Bonus, renamed Maternity Allowance and now non-means-tested, and Family Tax Benefit B.
 - i. The scheme would be evaluated at 2 years and 5 years.

Issues the Productivity Commission seeks feedback on

10. While people are invited to provide feedback on any aspect, the Commission has specified a number of issues. These are in full in Appendix B:
 - a. How to define self-employed
 - b. Whether the leave should be able to be taken part-time
 - c. Whether and how fathers could be given more leave
 - d. The effects on employers of parents extending their leave
 - e. What other Government policy measures could fit in with or complement the proposed scheme
 - f. Whether other forms of leave (sick, recreation, long service) should accrue while the employee is on paid parental leave
 - g. The costs and implications of making employers pay super entitlements.

Other questions for consideration

11. Is the duration of paid leave for mothers, fathers or partners acceptable?
12. Is the level of payment acceptable?
13. The start date – should it allow time off before the birth? Should it be able to start after the six months cut-off?
14. Should people be able to divide their paid leave in separate periods or along with part-time work?
15. What are the implications of the proposal for breastfeeding?
16. What are the implications for the health and wellbeing of the mother and child?
17. What do you think of the proposal that the Government pays the full cost apart from the superannuation?
18. Should the payment be made through employers or directly from Government?
19. Appendix D is a pro-forma response to assist you in responding.

Comments

20. There is some opposition in the community to any form of paid leave for parents. The reasons for this include the belief that childbearing is a choice and that families should accept the full financial costs of having children.
21. A Newspoll¹ survey undertaken in June 2007, however, showed that 76 per cent of respondents were in favour of paid maternity leave and only 17 per cent against (6 per cent didn't know).
22. The Commission estimated that up to 50 per cent of employed women had access to some form of paid maternity leave, at an average of 11 weeks. The great majority of these work in the health and education systems. Entitlements are very much lower in the private sector, where just over a third of female employees have access. Many of those without paid parental leave or with short durations have to return to work earlier than is in the

¹ See <http://www.nfaw.org/newspoll-survey-june-2007/> for full survey results

baby's wellbeing or their own. Family situations at the time of birth vary, depending on the partners' incomes, their housing costs, savings and debt, family friendly working conditions, parental preferences, breast-feeding, health of the mother and baby, availability of family support and child care and so on.

23. Nonetheless, it is well established that continuous parental care and breastfeeding strongly affects how a child regulates their emotions, communicates, solves problems, thinks logically and reacts to the world. Attachment C, written by the NSW Commissioner for Children and Young People, puts the case for parental care in the first year of life.
24. As the Commission points out, there are many reasons for providing paid maternity leave. These include the health, wellbeing and happiness of the child and parents and the need to ensure that parents can afford to take the appropriate length of time off work. Another is gender equity, recognising that family responsibilities, particularly around the time of childbirth, have a significant effect on women's lifetime earnings, relative to those of men and compensating them for that loss of income. There are benefits for the wider community of childbearing and child rearing. Child bearing can be seen as a human right and society should accommodate it, by protecting families against serious financial barriers.
25. The Commission, and the majority of submissions to the inquiry, are sensitive to the needs of the father, or the mother's partner. Fathers/partners need time to participate in the care and enjoyment of the child, to support the mother and child around the time of the birth and so on. Many women and men want to break down the traditional role expectation that unpaid work in the family and home is the mother's job. In the current situation, many fathers are forced to take on extra work to make up for the loss of the mother's income rather than being able to spend time with the new family. The Commission proposes specific paternity leave of two weeks, and the choice to share the main parental leave between the parents. International experience has shown that fathers are more likely to take leave, and employers are more willing to grant it, when fathers have a specific leave entitlement.
26. The final question is how to pay, and who should pay, for the parental leave entitlements. Submissions to the inquiry varied on this.
27. Many supported the approach that the Commission has taken of the Commonwealth paying, while others saw this as essentially a welfare approach.
28. Many saw a role for employers, in line with other forms of paid leave. As the Commission noted, direct payment by the employer would impact on small business and businesses that employ a high proportion of women. If employers had to pay directly it would be very likely to lead to covert discrimination against women, as some employer groups have pointed out.
29. A number of groups and individuals proposed a levy on all employers, which would spread the cost across the labour force. The Commission saw this as too complex.
30. The Commission envisaged that employers who already pay parental leave would continue to do so, in addition to this scheme. Those employers already carry a cost that others do not, while placing themselves in a more competitive position in the labour market than other employers. It is not clear whether the proposed scheme would have an effect on the current provision of paid maternity leave.
31. Another suggestion has been a HECS style 'income contingent' loan, repayable when the parent returns to work and attains a certain level of earnings.

32. People with an interest in policy and practice in relation to paid parental leave are urged to respond to the draft report by 14 November 2008. A pro forma is attached at Appendix D.

Appendix A

Productivity Commission's draft recommendations

DRAFT RECOMMENDATION 2.1

The Australian Government should introduce a statutory paid parental leave scheme that provides:

- Paid leave capped at the adult minimum wage for each week of leave for those covered by adult minimum wages
 - But with lower rates — to be set administratively — for juniors and others with hourly wages below the adult minimum
- Payments to be taxed and included in income for assessment of any welfare benefits
- Leave benefits for parents having twins or higher multiple births to be equal to those for parents bearing one child, supplemented by a payment equivalent to the new maternity allowance for each additional child (draft recommendation 2.6)
- Superannuation entitlements calculated on the going wage of the employee or at the relevant capped amount, whichever is the smaller, but
 - This would only be available for employees who (a) have met the Commission's eligibility criteria for paid parental leave under draft recommendation 2.4; (b) were entitled to employer superannuation contributions in their jobs before taking paid parental leave; and (c) were entitled to unpaid parental leave under the National Employment Standards
 - Super contributions would be limited to the statutory 9 per cent rate
 - Subject to its practical feasibility, including consideration of its compliance and administrative costs.

DRAFT RECOMMENDATION 2.2

The Australian Government should fund the cash component of the paid parental leave scheme, partially offsetting these costs by:

- Removing eligibility for family tax benefit B while parents are on paid parental leave
- Replacing the baby bonus with another, differently focused payment as set out in draft recommendation 2.6.

DRAFT RECOMMENDATION 2.3

Employers should fund superannuation contributions during the paid parental and paternity leave period, but only under the conditions specified in draft recommendation 2.1.

The employer should initially make payments to employees under the statutory parental leave scheme, with subsequent reimbursement by the Australian Government. However, an employer would only act as a paymaster for government where:

- An employee was also eligible for unpaid parental leave under the National Employment Standards and

- A workable method for speedy reimbursement of that employer was feasible – the Commission’s preferred approach is for employers that make at least monthly ‘pay as you go’ withholding payments to the Australian Taxation Office to receive reimbursement through those payments, with all other employers exempt from the obligation to act as a paymaster.

The Australian Government should pay other eligible parents directly, preferably through a non-welfare agency.

DRAFT RECOMMENDATION 2.4

The statutory paid parental leave scheme should be available for an employed parent (including the self-employed and contractors):

- Who has worked an average of at least ten hours a week on a continuous basis for 12 months or more prior to the expected birth date of the baby, and
- Who is also the primary carer of their baby.

DRAFT RECOMMENDATION 2.5

The paid parental leave scheme should give:

- Eligible mothers the initial parental leave entitlement, but allow them to transfer the entitlement to eligible partners who take on the role of the primary carer
- Fathers (and other eligible partners) a two week period of exclusive paternity leave on a ‘use it or lose it’ basis, even if the mother was not eligible for statutory paid parental leave
- Fathers access to paid parental leave if the mother is not eligible, but only where (a) the fathers meet the employment and primary carer eligibility requirements and (b) there are special circumstances, which would be determined administratively.

DRAFT RECOMMENDATION 2.6

The existing baby bonus should be replaced with an equivalently-valued, non-income tested maternity allowance, payable only to those parents not using statutory paid parental leave (with the exception of multiple births as set out in draft recommendation 2.1).

However, where a parent takes a shortened period of paid parental leave whose value is less than the maternity allowance, the parent would be entitled to a payment equal to the difference.

DRAFT RECOMMENDATION 2.7

The statutory paid parental leave scheme should provide a total of 18 weeks of paid leave for parents of a newborn child who meet the employment test, including:

- A requirement that (a) the period of leave must commence at birth, or after a period of other continuous leave that commences at the birth of the child; (b) must be commenced within six months of birth; (c) leave must be taken in one block; (d) only one transfer of paid parental leave between parents would be permitted and (e) there be no concurrent use of paid parental leave by parents
- Mothers of a stillborn baby, where the baby meets the requirement for birth registration

- Parents of non-familial adoptions, regardless of the child's age, from the time of placement
- Custodians of surrogate children, but subject to its compatibility with an impending uniform framework for surrogacy across Australian jurisdictions, (with provision for 12 weeks of paid parental leave to the surrogate mother).

Parents could take any paid parental leave remaining if their baby died.

Any outstanding leave could be transferred to the partner if the primary carer died.

Paternity leave could be taken concurrently with the mother's paid parental leave but would have to be taken within six months of the birth of the child.

DRAFT RECOMMENDATION 2.8

When the National Employment Standards are next subject to revision, the Australian Government should amend:

- Section 21 to require an employee on parental leave to provide six weeks notice for an extension to leave, unless an employer agrees to a shorter period
- Section 15 to provide job return guarantees to adoptive parents equivalent to natural parents.

DRAFT RECOMMENDATION 2.9

In addition to publicly provided information on the workings of a statutory paid leave scheme, the Australian Government should provide:

- Evidence-based advice to employers on how to reduce the disruption burdens associated with increased average durations away from work by carers, with this information especially directed at small business
- A web-based calculator that shows which employees would be eligible and sets out any obligations by employers.

DRAFT RECOMMENDATION 2.10

A paid parental leave scheme should include:

- A 'keeping in touch' provision that — subject to employer and employee consent — allows the employee to work up to 10 days while on paid parental leave, where that work strengthens the connection to their workplace
- Scope for eligible self-employed parents to maintain some oversight of their businesses while on leave.

DRAFT RECOMMENDATION 2.11

The Australian Government should provide more resources to allow effective support for breastfeeding during the first six months of an infant's life, with a focus on the post-initiation stage.

DRAFT RECOMMENDATION 2.12

The Australian Government should undertake:

- Ongoing assessments of the interaction of the paid parental leave scheme with the tax and welfare system
- An evaluation of the administrative aspects of the scheme two years into its life
- A comprehensive evaluation of the impacts of the scheme five years into its life.

Appendix B

Commission's request for feedback

The Commission welcomes feedback on all aspects of its proposed model of paid parental leave — for example, its advantages and disadvantages, unintended consequences and implementation issues. In particular, the draft report has highlighted that the Commission seeks participants' views on:

- an effective arrangement to deal with the definition of the self-employed/contractors and that would ensure appropriate compliance
- the practicality and merit of allowing paid parental leave to be taken part-time
- whether (and if so, how) the scheme could provide fathers with more equal access to paid parental leave, without risks of unintended consequences
- the likely disruption burdens for employers associated with employees taking longer periods of leave
- the patchwork of government programs that support parents with children under two years of age, and in particular:
 - gaps in services
 - learning from the existing policy measures
- policy measures that would increase the effectiveness of existing programs, including coverage, the triggers for parents' access to services, resourcing, and service delivery.
- whether other leave entitlements, such as sick, recreation and long service leave, should accrue during the period of paid parental leave, having regard to its costs and appropriateness (section 8.8)
- the costs involved in mandating the provision of (capped) employer superannuation contributions while an employee is on paid parental leave.

Appendix C

Why children need at least 12 months paid parental leave

Still forming the brain at birth

New research shows greater critical sensitivity of infants' brains in the first years of life, than previously understood.

At birth, a baby's brain is less than one quarter of its adult size.

While born with over 100 billion brain cells, many of the vital connections between the cells that help the brain grow occur during the first three years

They form the foundation for the brain's wiring - how a child controls their emotions, communicates, solves problems, thinks logically and reacts to the world.

What happens, or doesn't, in these first years has a major impact on healthy brain development and long-term mental and physical health.

Early care = early learning foundations

A baby's relationships and the type of care it receives in their first few years play a crucial role in how the connections in the brain are made.

When involved in positive and continuous one to one interactions with their parents, the brain connections are strengthened.

The best interactions between infant and parents for healthy brain development are continuous, consistent and back-and-forth. They help baby and carer to connect and understand each other, and the infant begins to attach meanings and associations to being touched and talked to.

For instance, when a baby smiles at its mother she leans over and kisses the baby, who then grabs her cheek, each interaction building upon the next. When the infant points and says "buh", its mother responds with "Do you want the ball?".

The nonverbal basis for language emerges and encourages the child with each interaction.

But when an infant is rarely noticed, touched or talked to, it lowers their ability to withstand stress, to learn, to control emotions and develop into healthy adults.

We only have a small window of opportunity to 'get it right'

At the end of six months, models of brain development show that the sensitive period for the lower level motor and sensory systems of the brain is beginning to close.

The next major systems of the brain involving language, social skills and reflective thinking are now developing, based on the foundations of the earlier period.

Language development at this early stage is essential - children who begin school with low language skills are likely to continue having difficulties with reading and writing throughout their childhood.

If an infant's relationship with his or her parents is inconsistent or unstable they will not receive the ongoing responsive interactions required for the healthy development of these capacities.

Parents learn to be better parents the more time they spend with their infants.

The repeated interactions parents have with their children help them to learn to become better at responding to their baby's needs and identifying problems.

Infants need these continuous interactions not only in their first 14 weeks or six months of life, but for a minimum of 12 months and perhaps longer.

When parents are in prolonged employment during their children's early years of life, the opportunities to learn these parenting skills can be affected.

Parents a better investment than formal childcare

Children's healthy brain development benefits most from being looked after by a parent, or very small number of constant caregivers, well attuned to the child's cues.

Continuity of carers in the early years cannot be assured in formal childcare and massive investments would be needed for the staff to child ratios that provide the continuous one-to-one interactions infants need.

While good quality childcare can provide benefits for children over the age of three, studies suggest entering early and spending long hours in formal childcare can increase later behavioural problems such as aggression.

It is much more cost effective and developmentally advantageous, to provide parents with paid leave rather than increasing formal childcare subsidies.

Why parental leave needs to be paid

We need to find ways to better support parents to stay at home during the first year of their child's life, to provide these continuous one to one interactions that infants need with their parents for healthy brain development.

However, parents will only be able to take leave from work to spend time at home with their infants during these critical first few years, if they can afford it.

Studies show that family income level impacts most on the length of parental leave parents take. The lower a family's income the less likely a parent will take up leave.

Lump sum maternity payments are not enough to promote the continuous interactions children need with their parents in their first few years. These payments do not guarantee that parents will take sufficient leave from work.

Leaving paid parental leave to the market place largely advantages children of middle and higher income earners who have the bargaining power to negotiate.

For this reason we consider a universal paid parental leave scheme that covers a period of at least 12 months is essential, for the wellbeing of baby, parents and society.

<http://www.kids.nsw.gov.au>

Appendix D

Suggested pro forma for responses²

The closing date for responses is 14 November, e-mail parentalsupport@pc.gov.au.

1. Are you an individual male or female, or responding on behalf of an organisation?
2. *If individual*, what is your age? Under 20, 20-34, 35-44, 45-54, 55 or over
3. *If individual*, do you have dependant children?
4. *If individual*, are you expecting or planning to have children in the future?
5. *If individual*, are you an employee, an employer, self-employed without employees, or not currently in paid work?

All respondents:

6. Are you in favour of paid maternity leave for mothers?
7. Are you in favour of paid leave for fathers? Should it be a separate entitlement or shared between parents?
8. Who should be included?
 - a. Casual employees, permanent, self employed, contractors, mothers outside the paid workforce, other?
 - b. What recent employment record, if any, should be the criterion for eligibility?
 - c. Should adopting families be treated the same way?
9. What about those with stillborn children or those whose baby dies?
10. What duration of paid leave do you think is appropriate?
11. The start date – should it allow for time off before the birth? Should it be able to start later than the six months cut-off proposed by the Commission?
12. Should people be able to use sick leave, recreation leave or partly accrued long service leave to extend the period of paid leave? In your experience will low income women especially have enough accrued leave to bring their period of paid leave up from the 18 weeks to the six months accepted as the desirable minimum?

² Prepared by NFAW

13. What level of payment is appropriate, eg minimum wage, replacement, replacement capped at a certain level, other?
14. Do you think it should be means tested?
15. How do you think the leave should be funded?
 - a. Government only,
 - b. Employer should pay
 - c. Government with an employer top-up
 - d. Government and a levy on all employers, or Government and a levy on both employers and employees
 - e. HECS style loan, repaid by parent later, or special savings accounts
 - f. Other and if so, what?
16. How should 'self-employed' be defined?
17. Should the leave be able to be taken part-time? In more than one period?
18. What would be the effect on employers of parents extending their leave?
19. What other Government policy changes should be made, along with or complementing the proposed scheme?
20. Should other forms of leave (sick, recreation, long service) accrue while the employee is on paid parental leave?
21. Should employers be required to continue to pay super entitlements?
22. Should a Government funded scheme be paid through employers or direct by Government, eg Centrelink?
23. Should small-medium employers receive a payment to compensate them for the costs of short-term replacement hiring? If so, how much?
24. What are the implications of the Commission's proposal for breastfeeding?
25. What are the implications for the health and wellbeing of the mother and child?
26. Would you support the option of an income contingent loan in addition to the Commission's recommended scheme? (A loan where the parents did not have to start repaying until their income reached a certain level).

Appendix E

How to make a submission³

Productivity Commission

Inquiry into Paid Maternity, Paternity and Parental Leave

This is a public inquiry and the Commission invites interested people and organisations to register their interest and make a written submission. Each submission, unless it is made in confidence, will be published on the Commission's website, at which time it becomes a publicly available document. This will occur shortly after receipt of the submission unless it is accompanied by a request to delay release for a short period of time. Submissions will remain on the Commission's website indefinitely. Copyright in submissions sent to the Commission resides with the author(s), not with the Commission.

Participants may comment on any matter they consider relevant to the inquiry. The following notes may assist in the presentation of submissions.

There is no set structure for submissions. They may range from a short letter outlining your views on a particular topic to a much more substantial document covering a range of issues. Where possible, you should provide evidence, such as data and documentation, to support your views.

Under certain circumstances the Commission can accept material in confidence, including commercially sensitive material. You are encouraged to contact the Commission before submitting such material, to discuss its nature and whether it would be in the public interest for the Commission to accept it. Such material should then be provided under separate cover and clearly marked 'IN CONFIDENCE'.

Submissions can be made in electronic, audio or printed format, however electronic format is preferred as this facilitates their publication on the website. The electronic version should be a text document (.txt, .rtf), a Microsoft Word document (.doc) or similar text format, rather than Adobe Portable Document File (.pdf) format, in order to make them accessible for people using assistive technology, e.g. screen readers. Arrangements can also be made to record oral submissions over the telephone; these will be transcribed by the Commission into a text document for publishing on the website.

All tracking changes, editing marks, hidden text and internal links should be removed from submissions before sending them to the Commission. Large logos and decorative graphics should also be removed in order to keep file sizes as small as possible.

Each submission should be accompanied by the **submission cover sheet** (attached) in which submitting individuals and organisations can provide personal and organisational details not

³ From the Productivity Commission's website
www.pc.gov.au/projects/inquiry/parentalsupport/submission

for publication. For submissions received from individuals, all personal details, other than name and state or territory of residence, (e.g. home address, home phone number) will be removed from the text of the submission before it is made publicly available. This is to ensure compliance with privacy laws.

Submissions can be forwarded to the inquiry team as follows.

**Postal: Parental Leave Inquiry
Productivity Commission
GPO Box 1428, Canberra City, ACT 2601, Australia.**

Facsimile (fax): Roberta Bausch, (02) 6240 3377.

Email: parentalsupport@pc.gov.au

Productivity Commission

**SUBMISSION COVER SHEET
(not for publication)**

Inquiry into Paid Maternity, Paternity and Parental Leave

Please complete and submit this form with your submission to:

By email: parentalsupport@pc.gov.au **OR** **By fax:** (02) 6240 3377

Inquiry into Paid Maternity, Paternity
and Parental Leave

Productivity Commission
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Canberra City ACT 2601

Organisation:

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Suburb/City:

**State &
P'code:**

Postal address:

Suburb/City:

**State &
P'code:**

Principal contact:

Position:

Email address:

Phone:

Fax:

Mobile:



Please indicate if your submission:

- contains NO confidential material
- contains SOME confidential material (provided under separate cover and clearly marked)
- contains confidential material and the WHOLE submission is provided 'IN CONFIDENCE'

Please note:

For submissions made by individuals, all personal details other than your name and the State or Territory in which you reside will be removed from your submission before it is published on the Commission's website.

Submissions will be placed on the Commission's website, shortly after receipt, unless marked confidential or accompanied by a request to delay release for a short period of time, where they will remain indefinitely.

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