

From: Kieran Jack [mailto:Kieran.Jack@afei.org.au]
Sent: Wednesday, 20 September 2017 4:01 PM
To: AMOD
Cc: Vivienne Wiles; stephen.bull@unitedvoice.org.au; Kate Thomson; Andrew Crabb
Subject: AM2014/264 Dry Cleaning and Laundry Industry Award 2010

Dear Sir/Madam,

AM2014/264 Dry Cleaning and Laundry Industry Award 2010

I refer to the above matter and the email correspondence from AMOD on 8 September 2017.

Parties have been asked to comment on matters raised in relation to Items 9 and 22 in the submission summary document.

Item 9

AFEI disagrees with the Commission's view that removing the word 'average' would be a technical/drafting change that would not impact the operation of the award. We agree with ABI and the NSW Business Chamber that the modern award currently allows for the averaging of hours of full-time employees in the dry cleaning sector.

The averaging arrangement is clearly stated in clause 21.1(a) of the modern award: *The ordinary hours of work will **average** 38 hours per week* (our emphasis added). This is consistent with many predecessors to the modern award, including the *Dry Cleaning Industry Award 2000* the *Dry Cleaning (State) Award (NSW)* and the *Dry Cleaners Award (SA)*.

Item 22

As expressed previously, AFEI is concerned that any alteration to commencing and finishing times of shifts as defined in clause 24.1(b) of the Exposure Draft will amount to a substantive change.

Further, AFEI does not consider any such change necessary considering the award already restricts how hours of work may be rostered, including through the span of hours contained in clause 21.1(b). AFEI remains opposed to the joint AWU, TCFUA and United Voice proposal regarding this clause.

Please feel free to contact me if you have any questions about the above.

Kind regards,

Kieran Jack | Workplace Relations Adviser
Australian Federation of Employers and Industries

Street Address - 99 Bathurst Street Sydney New South Wales 2000

Postal Address - PO Box A233 Sydney South New South Wales 1235

Telephone - 02 9264 2000

Facsimile - 02 9261 1968

Email - kieran.jack@afei.org.au

Internet - www.afei.org.au