



10 June 2016

Vice President Hatcher  
Fair Work Commission

Dear Associate to Vice President Hatcher

**AM2014/196 and AM2014/197: 4 yearly review of modern awards – Casual Employment and Part-time Employment – ANMF submission**

We refer to the submissions of the Private Hospital Industry Employer Associations (PHIEA) dated 22 February 2016 regarding the above matters.

The ANMF submits that paragraphs 7-16, 20-26, 42-44, 46-49, and 52-56 of the PHIEA submission make factual assertions for which there is no foundation in the evidence either adduced by PHIEA or any other party.

Further, paragraphs 17-19, 28-37 and 61 and the charts referred to therein contain no information identifying the source of data and there is no basis upon which the matters dealt with can be tested.

For these reasons, the ANMF submits that the above paragraphs should be treated as conjecture and entirely disregarded.

The submissions of the Aged Care Employers (ACE) dated 26 February 2016 suffer from similar deficiencies. Paragraphs 5, 10-12, 15, and 22 make factual assertions for which there is no foundation in the evidence either adduced by ACE or any other party and should similarly be treated as conjecture and disregarded. Further to the extent to which paragraphs 8, 13, 15, and 17 rely on the PHIEA submissions referred to above, the ACE submissions should be disregarded.

The ANMF otherwise supports the submissions of the ACTU in these matters.

Yours sincerely

A handwritten signature in black ink that reads "Andrew McCarthy".

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