



SUBMISSION ON BEHALF OF THE AUSTRALIAN FEDERATION OF
EMPLOYERS AND INDUSTRIES (AFEI)

AM2008/92 – WATER, SEWERAGE AND DRAINAGE SERVICES

EXPOSURE DRAFT WATER INDUSTRY AWARD 2010

AWARD MODERNISATION

AFEI
Australian Federation of
Employers & Industries

BEFORE THE AUSTRALIAN INDUSTRIAL RELATIONS COMMISSION

**AWARD MODERNISATION – AM2008/92 – WATER, SEWERAGE
AND DRAINAGE SERVICES**

**SUBMISSION CONCERNING EXPOSURE DRAFT WATER INDUSTRY
AWARD 2010**

1. The Australian Federation of Employers and Industries (AFEI) has previously made submissions concerning the Water, Sewerage and Drainage Services Industry and makes the following submission in response to the Exposure Draft Water Industry Award 2010 (the “exposure draft”).
2. AFEI relies on our earlier submissions that a modern award should not be created for the Water Industry.
3. The industry is currently dominated by enterprise awards. The industrial instruments in the industry have been tailored to meet the needs of the individual enterprises. AFEI submits that a modern award should not attempt to reflect the diversity of the current enterprise based instruments.
4. AFEI submits that a modern award for the industry would be derived from the conditions that currently apply to seven companies, all located in Victoria. AFEI submits that this is an inappropriate basis for a modern industry award.

5. AFEI submits also that is inappropriate for the exposure draft to cover contractors or the employees of contractors that are currently award-free. AFEI submits that these should not be covered by any modern award. If they were to be covered by the exposure draft the proposed conditions would be entirely inappropriate for small-scale businesses that carry out contracting work for water corporations.

21 October 2009