

Robert Janissen  
GPO Box 3131 Canberra ACT 2601  
tel: (02) 6243 1111 [www.accc.gov.au](http://www.accc.gov.au)

Dear Sir,

**RE: Homeworker Code Committee's application for authorisation  
[AA1000418]— interested party consultation**

This submission expresses support for the HWCC seeking re-authorisation in order to continue to give effect to the Homeworkers Code of Conduct, to be renamed 'Ethical Clothing Australia's Code of Practice, Incorporating Homeworkers' (**the Code**).

The comments in this submission are based on my research experience of home-based work in the Australian and international context.

The following outlines key reasons why the re-authorisation of the Code is beneficial.

1. An ongoing need for measures that curb exploitative labour practices in the Australian TCF sector;
2. Consumer confidence in Australian brands that demonstrate compliance with the code;
3. Consumer concerns that exploitative practices are being addressed; and
4. Increasing recognition and value for Australian companies through participation in the Code.

**An ongoing need for measures that curb exploitative labour practices in the Australian TCF sector;**

The Code has been in operation for a considerable time and has contributed substantial benefits to the TCF sector in Australia and garments homeworkers. The Code contributes to having an educational and compliance support given the ongoing lack of observance of labour regulation concerning subcontracted garment work. Research shows that homeworkers still experience poor labour conditions and have a weak bargaining position, therefore the Code promotes better employment standards, through ethical practice.

**Consumer confidence in Australian brands that demonstrate compliance with the code;**

The Code offers consumers a level of assurance that accredited companies are meeting the Code requirements, therefore instilling a level of consumer confidence and support in making ethical purchases.

**Consumer concerns that exploitative practices are being addressed**

The community has an interest in government, business and union bodies addressing concerns around poor labour practices in the fashion industry. The Code is a mechanism that promotes better work practices and creates incentives for ethical business practice.

**Increasing recognition and value for Australian companies through participation in the Code.**

Promotion of companies that become accredited to the Code gains commercial and reputation advantage through increased consumer support for their products. There remains significant public benefit in improving ethical supply chain practices, broader promotion of the Code aims within the TCF industry, and the improvement of compliance to legal obligations concerning subcontracting, labour practices and homework labour conditions.

I am not aware of any detrimental consequences of the operation of the Code and request you to consider favourably the application for re-authorisation.

Yours sincerely



Dr Annie Delaney  
Senior Lecturer  
School of Management  
College of Business  
RMIT University

