



ethical
clothing
AUSTRALIA

T : (03) 9419 0222
F : (03) 8415 0818

Postal Address :
PO Box 2087,
Fitzroy, VIC 3065

Street Address :
Suite A, Level 1,
205 Johnston St,
Fitzroy, VIC 3065

Dr Richard Chadwick
General Manager
Australian Competition and Consumer Commission (ACCC)
Adjudication Branch
Australian Competition and Consumer Commission
Level 35 | 360 Elizabeth Street
Melbourne, Victoria 3000

21 February 2013

Dear Richard,

Please find attached an application and submission on behalf of the Homeworkers Code of Practice Committee Inc (The Committee) for revocation and substitution of the existing authorisation, due to expire on 11 March 2013.

A fee waiver has been granted by the ACCC in relation to this application. A copy of this letter is enclosed.

We have also submitted an 'interim authorisation' to enable the existing Code of Practice to remain authorised while the ACCC considers our application.

The Committee is of the view that there is a need for the current authorisations to be continued beyond March 2013, in order to address the impacts of non-compliance with relevant Award and legislative requirements on persons working in the TCF industry, especially homeworkers.

The attached submission considers the arrangements for which 're-authorisation' is sought are unlikely to have any adverse effect on competition in any market in the future and public benefits have significantly outweighed any adverse effect on competition (if any) that might arise from the arrangements, and will continue to do so.

The Committee would be happy to provide any further submission on these matters should the Commission require further information.

Yours sincerely

Simon McRae
National Manager
Ethical Clothing Australia

Dr Richard Chadwick
General Manager
Adjudication Branch
Australian Competition and Consumer Commission
Level 35 | 360 Elizabeth Street
Melbourne Victoria 3000

21 February 2013

Dear Richard,

Re: Request for interim authorisation

I write in relation to the Homeworkers Code of Practice Committee Inc. (**Committee**) authorisations A91252 - A91255 which are due to expire on 11 March 2013.

On behalf of the Committee, I respectfully request that the Australian Competition and Consumer Commission (**ACCC**) grant interim authorisation for the Homeworkers Code of Practice¹ (**Code of Practice**), to commence immediately prior to the expiration of the current authorisation.

1. Why is interim authorisation sought?

Interim authorisation is required urgently to ensure that the operation of the Code of Practice continues to receive the protection of authorisation whilst a determination is made regarding the substantive application for revocation and substitution (**Application**) of the existing authorisation, which will be submitted to the ACCC in March 2013.

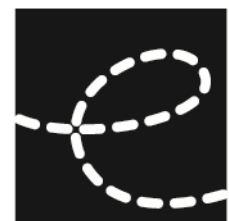
The Committee is of the view that there is a need for interim authorisation to ensure that the operation of Ethical Clothing Australia's accreditation system can continue addressing instances of non-compliance with the relevant Award and legislation and providing low-paid workers in the Textile, Clothing and Footwear (**TCF**) sector with minimum wages and fair working conditions.

This review of the existing Code originally began in 2010. At the time employer and trade union representatives prepared a briefing document with an agreed set of objectives for the Committee to review. The Committee subsequently meet in June 2010 and made recommendations in response to the briefing paper.

The Review was then effectively put on hold because of staff shortages and the need to prioritise other projects (e.g. development of industry supply chain database, the design and launch of the consumer campaign etc.) following a significant reduction in our funding. The Committee was able to restart the review during 2012 and build on the work that had already been done.

Over the preceding six months, the Committee has been reviewing the Code of Practice and finalising a revised version. This lengthy process is now in its

¹ The Homeworkers Code of Practice and its accreditation system is overseen by Ethical Clothing Australia



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final stages, but it has precluded the submission of an Application in relation to the revised Code of Practice sooner. As a result, interim authorisation is urgently sought.

2. What are the risks to effected parties if interim authorisation is not granted?

The Committee, its member organisations, businesses that participate in the Ethical Clothing Australia accreditation system and Textile, Clothing and Footwear (TCF) workers would potentially be impacted in the event that the request for interim authorisation is denied.

The Committee maintains the view that the arrangements which underpin the Code of Practice do not substantially affect a participating business' ability to compete. However, the Committee strongly recognises the importance of ensuring that participating businesses are not put at risk of breaching the *Competition and Consumer Act 2010 (the Act)* in the context of complying with their obligations under the Code of Practice, the TCF Award and relevant legislation.

At present, 221 businesses are participating in the accreditation system as signatory retailers or accredited businesses. A further 21 businesses are undergoing the accreditation process. If interim authorisation were not granted, these participating businesses would not be afforded the coverage of the authorisation and may be unable to fulfil their obligations under the Code of Practice.

One such example would be a situation where a breach by a supplier warranted a cancellation of a contract by a participating retailer, however in the absence of authorisation, a participating business could not take this step due to the possibility that such conduct would be in breach of the Act.

Although the Committee remains of the view that there is no evidence that the Code of Practice has had an adverse on competition since its authorisation in 2000, the potential for it to be considered as a breach of the Act is significant enough for the operation of the Code of Practice to be constrained in the absence of interim authorisation.

3. What is the potential impact on the relevant market if interim authorisation is granted?

As the Code of Practice has been continuously authorised by the ACCC since 2000, it is apparent that the granting of interim authorisation would represent a preservation of the market status quo within the Australian TCF industry.

Since the last authorisation was sought, there has been a considerable expansion in the number of businesses who are seeking accreditation or have been accredited. The number of accredited brands has almost doubled to 80 and some 500 suppliers have been audited. As such, the coverage of the Code of Practice on the TCF industry is increasingly significant.

Arguably, it would be more likely to have an impact on the relevant market, namely the TCF sector, if interim authorisation were to be denied in this instance.

4. What are the possible detriments or benefits to the public of granting interim authorisation?

The Committee is of the view that interim authorisation, as is the case with the existing authorisation, is unlikely to have any adverse effect on competition in any market in the short or longer term, and that the public benefits which the Code of Practice provides have significantly outweighed any adverse effect on competition which might arise from the arrangements.

It is noted that the ACCC took the view in its 2011 determination that the public detriments that result from the Code of Practice are likely to be minimal².

The Committee notes that the core purposes of the Code of Practice is to facilitate compliance by TCF businesses with Award and legislative protections for workers and subsequently reduce exploitation of TCF workers. Since Federal government funding for the Code of Practice commenced in 2008 more than 2500 compliance audits covering more than 500 suppliers have been completed, and more than 6000 homeworkers have been assisted to ensure they receive their legal pay and entitlements.

As such, a clear public benefit is identifiable and it is arguable that any public detriment is limited. Furthermore, the educative and promotional aspects of the accreditation system and its associated certification trademark deliver a significant public benefit in enabling consumers to identify and support ethical Australian TCF products.

On behalf of the Committee, I would be happy to provide any further submission on these matters should the Commission require further information.

Yours sincerely



Simon McRae
National Manager
Ethical Clothing Australia

² Australian Competition and Consumer Commission, Determination in respect of the Homeworkers Code of Practice, 17 Feb. 13 2011, para 5.43, p 19.

Appendix A: Interested parties

- 1. NSW Business Chamber**
Zoe Jenkins [Zoe.Jenkins@ablawyers.com.au]
- 2. Australian Industry Group**
Ted Eftimiadis [teftimiadis@pacbrands.com.au]
- 3. Council of Textile Fashion Industries of Australia**
Jo-Ann Kellock [JKellock@tfia.com.au]
- 4. Textile Clothing & Footwear Union of Australia**
Michele O'Neil [moneil@tcfvic.org.au]
Barry Tubner [barryt@tcfua.org.au]
- 5. Australian Retailers Association**
Russell Zimmerman [Russell.Zimmerman@retail.org.au]
- 6. National Retailers Association**
- 7. Accredited businesses** (we can provide up to date list)
- 8. Retailer signatories** (we can provide up to date list)
- 9. Defence Materials Organisation**
Newman, Mark MR [Mark.Newman2@defence.gov.au]
Martin, Ray MR [Ray.Martin3@defence.gov.au]
Kohl, Haydn COL [haydn.kohl@defence.gov.au]
- 10. Fair Work Commission**
- 11. Department of Education, Employment & Workplace Relations**
BOOTH Damien [Damien.Booth@deewr.gov.au]
- 12. Department of Innovation, Industry, Science and Research**
Davis, Gary [Gary.Davis@innovation.gov.au]
- 13. Department of Finance & Deregulation**
Wagner, Jane [Jane.Wagner@finance.gov.au]
14. Department of Immigration and Citizenship
- 15. Fair Wear**
Shelley Marshall [shelley.marshall@monash.edu]
- 16. Asian Women at Work**
Lina Cabaero [coordinator@awatw.org.au]
- 17. Oxfam Australia**
Daisy Gardener [daisyg@oxfam.org.au]
- 18. Department of Further Education, Employment, Science and Technology, South Australia**
- 19. Department of Services, Technology and Administration, Industrial Relations, NSW**



**Australian
Competition &
Consumer
Commission**

Our Ref: NA
Contact Officer: Tanya Hobbs
Contact Phone: 02 6243 1029

GPO Box 3131
Canberra ACT 2601
23 Marcus Clarke Street
Canberra ACT 2601
tel: (02) 6243 1111
fax: (02) 6243 1199
www.accc.gov.au

19 February 2013

Simon McRae
National Manager
Ethical Clothing Australia

By email: simon@ethicalclothingaustralia.org.au

Dear Mr McRae

Fee waiver request

I refer to your letter of 18 February 2013 to the Australian Competition and Consumer Commission (ACCC) in respect of the Homeworker Code Committee's (HWCC) proposed application for revocation of its existing authorisations A91252-A91255 and substitution of new authorisations. In your letter you have requested that the ACCC grant a fee waiver in respect of this proposed application.

In particular, you have requested that the fee to be paid in relation to an application for revocation and substitution to be lodged by the HWCC be waived in whole.

In support of your request, among other things, you submitted that:

- HWCC (trading as Ethical Clothing Australia) is a not-for-profit organisation.
- HWCC relies on government funding from the Department of Education, Enterprise and Work Relations (DEEWR) to enable it to administer, implement and promote the Homeworker Code of Practice (HWCP).
- HWCC's revenue from fees charged to textile, clothing and footwear businesses in relation to accreditation of these businesses' compliance with the HWCP is very low and the cost of accreditation is largely subsidised by government funding.
- HWCC's current funding has been reduced significantly in real terms.

Having regard to the above, as a person authorised to assess fee waiver requests for and on behalf of the ACCC, I wish to advise that the application fee to be paid by the HWCC has been waived in whole. No application fee will apply with respect to the application for revocation and substitution to be lodged by the HWCC.

This decision will remain in force for a period of three months. The three month period will expire on 18 May 2013.

A copy of this letter should accompany the application for revocation and substitution to be lodged by HWCC. The cover letter to the application should mention that a letter from the ACCC regarding a fee waiver is enclosed with the application. The application together with this letter will be placed on the public register at that time.

If the application for revocation and substitution is lodged by HWCC after 18 May 2013, a full application fee of \$2500 will apply, unless a subsequent request for a fee waiver is made and ultimately approved by the ACCC.

Should you have any queries in relation to this matter, please do not hesitate to contact Tanya Hobbs on 02 6243 1029.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Richard Chadwick', with a long horizontal stroke extending to the right.

Dr Richard Chadwick
General Manager
Adjudication Branch

Form FC

Commonwealth of Australia

Trade Practices Act 1974 — subsection 91C (1)

APPLICATION FOR REVOCATION OF A NON-MERGER AUTHORISATION AND SUBSTITUTION OF A NEW AUTHORISATION

To the Australian Competition and Consumer Commission:

Application is hereby made under subsection 91C (1) of the *Trade Practices Act 1974* for the revocation of an authorisation and the substitution of a new authorisation for the one revoked.

PLEASE FOLLOW DIRECTIONS ON BACK OF THIS FORM

1. Applicant

A91354 (a) **Name of applicant:**

A91355 Homeworker Code Committee Incorporated
A91356

A91357 (b) **Description of business carried on by applicant:**

The Homeworkers Code of Practice Committee is a not-for-profit incorporated association, comprising representatives from the Textile Clothing and Footwear Union of Australia (TCFUA), and employers and employer bodies (Pacific Brands Workwear Group; Cue Clothing; Jets Swimwear; The Council of Textile, Fashion Industries of Australia Ltd [TFIA]; the NSW Business Chamber, and the Australian Industry Group [AiG]). The Committee oversees the operation of the Homeworkers Code of Practice, which is a voluntary mechanism for retailers, manufacturers and fashion houses to ensure compliance across their supply chains with minimum Award and legislative conditions.

(c) **Address in Australia for service of documents on the applicant:**

Homeworker Code Committee Inc
PO Box 2087
Fitzroy VIC 3065

2. Revocation of authorisation

(a) **Description of the authorisation, for which revocation is sought, including but not limited to the registration number assigned to that authorisation:**

Authorisations A91252-A91255, granted on 17 February 2011.

A91252 - Exclusionary Provisions (Primary Boycott)

A91253 - Agreements Affecting Competition

A91254 - Secondary Boycotts

A91255 - Boycott Agreements

(b) **Provide details of the basis upon which revocation is sought:**

Current authorisations are due to expire on 11 March 2013. Arrangements under the Homeworkers Code of Practice will continue to operate, so revocation and substitution of the current authorisation is sought.

3. Substitution of authorisation

- (a) **Provide a description of the contract, arrangement, understanding or conduct whether proposed or actual, for which substitution of authorisation is sought:**

The Homeworkers Code of Practice – Parts 1 and 2. (See Attachment A) forms the basis for arrangements requiring substitution.

- (b) **Description of the goods or services to which the contract, arrangement, understanding or conduct (whether proposed or actual) relate:**

Accreditation of businesses in the Australian textile, clothing and footwear industry.

- (c) **The term for which substitute authorisation of the contract, arrangement or understanding (whether proposed or actual), or conduct, is being sought and grounds supporting this period of authorisation:**

The Committee seeks substitute authorisation for a period of 1 year.

4. Parties to the contract, arrangement or understanding (whether proposed or actual), or relevant conduct, for which substitution of authorisation is sought

- (a) **Names, addresses and description of business carried on by those other parties to the contract, arrangement or understanding (whether proposed or actual), or the relevant conduct:**

Textile Clothing and Footwear Union of Australia (TCFUA) – Trade Union
The Australian Retailers Association (ARA) – Industry Association
The Council of Textile and Fashion Industries of Australia (TFIA) – Industry Association
The Australian Industry Group (AiG) – Industry Association
The New South Wales Business Chamber – Industry Association
Parties listed in Appendixes D and E – individual TCF businesses

- (b) **Names, addresses and descriptions of business carried on by parties and other persons on whose behalf this application is made:**

N/A

- (c) **Where those parties on whose behalf the application is made are not known - description of the class of business carried on by those possible parties to the contract or proposed contract, arrangement or understanding:**

Textile, Clothing and Footwear businesses manufacturing or arranging the manufacture of products in Australia who may seek accreditation under the Code.

5. Public benefit claims

- (a) **Arguments in support of application for substitution of authorisation:**

The Committee's previous submissions in 2000, 2005 and 2010, outline in detail the exploitation of outworkers in the textile, clothing & footwear industry. Since the last submission from the Committee in 2010 we are still uncovering ongoing issues of the exploitation of outworkers, despite the growing numbers of accredited businesses and compliance audits. This has also been supported by evidence provided to the Senate Education, Employment and Workplace Relations Legislation Committee inquiry into the *Fair Work Amendment (Textile, Clothing and Footwear Industry) Act 2012* and

to the Fair Work Commission review of the *2010 Textile, Clothing, Footwear and Allied Industry Award (TCFAI Award)*. This illustrates that there remains an ongoing issue of exploitation in the TFC industry.

Since its inception, the Code of Practice has delivered numerous benefits for workers in the industry, both in factories and in private homes. Significant public benefit is derived from a mechanism that assists businesses to ensure legal pay and conditions are being provided to all workers in their supply chain. Additionally, provision of information and education to workers, particularly home based workers in relation to their rights and entitlements is a significant public benefit. Put simply, the Code of Practice has delivered a significant improvement in the level of compliance by TCF businesses with their minimum Award and legislative obligations.

Since January 2010 the Ethical Clothing Australia (ECA) accreditation program has undertaken more than 2100 compliance audits and provided advice and assistance to more than 1400 outworkers. The number of accredited businesses has almost doubled to 80 and their supply chains are now compliant with the TCFAI Award. Case studies demonstrating some of the successes of the program are included in Appendixes A and B.

A key component of the ECA program is awareness raising, education and training. Promotional activities are designed to: Raise general awareness of the aims and methods of Ethical Clothing Australia; promote ethical clothing/businesses to consumers; promote the program directly to industry as a tool to ensure ethical production and as a way of demonstrating a business's ethical credentials; and raise industry awareness of the TCF Award and other laws designed to protect workers in the industry. This is done through training workshops, media opportunities, community and industry events, public presentations and the development of educational resources. A list of examples is provided in Appendix C.

The development of the new Ethical Clothing Australia trademark has resulted in a higher rate of uptake of the program. This has meant more businesses are able to demonstrate through promotion and labelling their ethical Australian-made credentials in the marketplace. Not only does this provide a public benefit for business, but consumers can readily identify and support accredited brands. The public benefit derived from the Code is evident across the spectrum, for workers, businesses and consumers.

In making out the public benefit submission, the Committee points to previous submissions, in addition to the documents noted above, as to the nature and structure of the industry and the disadvantaged position of homeworkers. The Committee invites the ACCC to endorse these findings in terms of the ongoing importance of the Code of Practice in securing Award compliance and to accept that the Award and the Code are important measures to bring to an end the exploitation of disadvantaged groups of workers in the TCF industry.

The arrangements under the Code have provided and continue to provide public benefits including:

- Lessening the exploitation of Textile Clothing and Footwear (TCF) workers, in particular homeworkers
- Providing information and advice to TCF workers, in particular homeworkers about their entitlements and helping them access them.
- Facilitating business compliance with statutory requirements through the provision of information, training and support to TCF businesses seeking award and code compliance.
- Helping to ensure the provision of award pay and conditions for workers who work in the TCF industry, both in the formal sector (factory based) and informal sector (home workers/outworkers).
- Promoting improved occupational health and safety through addressing TCF industry working conditions, such as excessive hours, poor working environments and low pay.

- Improving the social environment for children of homeworkers by providing more standardised working conditions for parents (the homeworkers themselves).
- Enabling consumers to identify and purchase ethically produced Australian made textile, clothing and footwear products and support the local industry.
- Providing a platform for businesses to promote their ethical credentials to the growing consumer base interested in purchasing goods that are made in Australia under fair conditions.
- Educating consumers about working conditions in the industry so they can make informed ethical choices when purchasing Australian TCF products.

These public benefits have, over the life of the Code, significantly outweighed any adverse effect on competition (if any) that might arise from the arrangements, and will continue to do so.

(b) Facts and evidence relied upon in support of these claims:

Refer to Appendixes A, B and C.

6. Market definition

Provide a description of the market(s) in which the goods or services described at 3 (b) are supplied or acquired and other affected markets including: significant suppliers and acquirers; substitutes available for the relevant goods or services; any restriction on the supply or acquisition of the relevant goods or services (for example geographic or legal restrictions):

The Code applies to businesses in the TCF industry that manufacture products in Australia. The market encompasses the breadth of the TCF supply chain; through the processing of fibres for textile manufacturer, to design, construction and manufacture of garments or footwear, wholesaling of finished products, concluding in retail of those products to the end consumer.

7. Public detriments

- (a) Detriments to the public resulting or likely to result from the substitute authorisation, in particular the likely effect of the conduct on the prices of the goods or services described at 3 (b) above and the prices of goods or services in other affected markets:

Whilst the arrangements may have potential to constrain suppliers, the arrangements under the Code do not substantially affect participating parties' ability to compete. Conversely, the arrangements encourage and facilitate a point of distinction for businesses (i.e. as being ethical) in the market place. In this context it is arguable that competition is actually enhanced by the operation of such arrangements, premised on a broader set of factors other than being based solely on price.

There is no evidence that the arrangements have had any adverse effect on competition in any market.

The arrangements are unlikely to have any adverse effect on competition in any market in the future.

- (b) Facts and evidence relevant to these detriments:

8. Contracts, arrangements or understandings in similar terms

This application for substitute authorisation may also be expressed to be made in relation to other contracts, arrangements or understandings (whether proposed or actual) that are, or will be, in similar terms to the abovementioned contract, arrangement or understanding

- (a) Is this application to be so expressed?

No

- (b) If so, the following information is to be furnished:

- (i) description of any variations between the contract, arrangement or understanding for which substitute authorisation has been sought and those contracts, arrangements or understandings that are stated to be in similar terms:

N/A

- (ii) Where the parties to the similar term contract, arrangement or understanding(s) are known - names, addresses and description of business carried on by those other parties:

N/A

- (iii) Where the parties to the similar term contract, arrangement or understanding(s) are not known — description of the class of business carried on by those possible parties:

N/A

9. Joint Ventures

- (a) Does this application deal with a matter relating to a joint venture (See section 4J of the *Trade Practices Act 1974*)?

No

- (b) If so, are any other applications being made simultaneously with this application in relation to that joint venture?

N/A

- (c) If so, by whom or on whose behalf are those other applications being made?

N/A

10. Further information

- (a) Name, postal address and telephone contact details of the person authorised by the parties seeking revocation of authorisation and substitution of a replacement authorisation to provide additional information in relation to this application:

Simon McRae
National Manager
Ethical Clothing Australia
PO Box 2087

Fitzroy VIC 3065

T: 03 9419 0222

F: 03 8415 0818

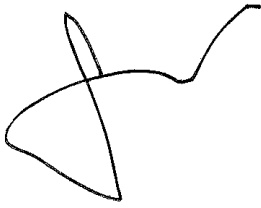
M: 0415 614 898

simon@ethicalclothingaustralia.org.au

21 / 02 / 2013

Dated.....

Signed by/on behalf of the applicant



.....
(Signature)

Simon McRae

.....
(Full Name)

Signed on behalf of the Homeworkers Code of Practice Committee by the
National Manager

DIRECTIONS

1. Where there is insufficient space on this form to furnish the required information, the information is to be shown on separate sheets, numbered consecutively and signed by or on behalf of the applicant.
2. Where the application is made by or on behalf of a corporation, the name of the corporation is to be inserted in item 1 (a), not the name of the person signing the application and the application is to be signed by a person authorised by the corporation to do so.
3. In item 1 (b), describe that part of the applicant's business relating to the subject matter of the contract, arrangement or understanding, or the relevant conduct, in respect of which substitute authorisation is sought.
4. In completing this form, provide details of the contract, arrangement or understanding (whether proposed or actual), or the relevant conduct, in respect of which substitute authorisation is sought.
 - (a) to the extent that the contract, arrangement or understanding, or the relevant conduct, has been reduced to writing — provide a true copy of the writing; and
 - (b) to the extent that the contract, arrangement or understanding, or the relevant conduct, has not been reduced to writing — provide a full and correct description of the particulars that have not been reduced to writing; and
 - (c) If substitute authorisation is sought for a contract, arrangement or understanding (whether proposed or actual) which may contain an exclusionary provision — provide details of that provision.
5. Where substitute authorisation is sought on behalf of other parties provide details of each of those parties including names, addresses, descriptions of the business activities engaged in relating to the subject matter of the authorisation, and evidence of the party's consent to authorisation being sought on their behalf.
6. Provide details of those public benefits claimed to result or to be likely to result from the contract, arrangement or understanding (whether proposed or actual), or the relevant conduct, including quantification of those benefits where possible.
7. Provide details of the market(s) likely to be affected by the contract, arrangement or understanding (whether proposed or actual), in particular having regard to goods or services that may be substitutes for the good or service that is the subject matter of the application for substitute authorisation.
8. Provide details of the detriments to the public, including those resulting from the lessening of competition, which may result from the contract, arrangement or understanding (whether proposed or actual). Provide quantification of those detriments where possible.
9. Where the application is made also in respect of other contracts, arrangements or understandings, which are or will be in similar terms to the contract, arrangement or understanding referred to in item 2, furnish with the application details of the manner in which those contracts, arrangements or understandings vary in their terms from the contract, arrangements or understanding referred to in item 2.

Appendix A

COMPLIANCE CASE STUDIES

Ethical Clothing Australia (ECA) facilitates the compliance audits of prospective and existing TCF businesses with the assistance of the TCFUA. The TCFUA compliance officers work closely with the ECA Accreditation team to ensure businesses are complying with the Code of Practice and TCFIA Award. Since January 2010 there have been more than 2100 compliance audits of TCF businesses and their suppliers conducted.

See below where the compliance process has had a positive impact for workers and businesses.

Case study 1

When undertaking the compliance audit at a maker in Springvale, an anonymous caller who said she was a worker there and that the workers were paid substantially less than the award rate of pay but were scared to speak out in front of the boss.

After conducting an initial audit, it was discovered:

1. Many of the workers were paid less than the Award rate
2. There were serious storage issues in the factory creating a tripping risk to the workers
3. The owner was paying peoples balance of personal leave out as a bonus at Christmas time so their personal leave did not accumulate
4. The workers didn't receive 17 ½ % loading on their holiday pay

After 4 attempts to do a follow up visit to check if the factory had reached compliance, the owner refused to co-operate.

The principal company was asked who was giving this maker work and had a pending ECA application, to speak to the maker and ask him to cooperate with the union for compliance checks. The principal company had a meeting with the company and reminded the maker that he is expected to operate within the laws anyway and as part of an ethical supply chain he needs to cooperate with the Union and be checked for compliance in order to continue to work for the company.

The compliance officer then met again with the maker with intentions of completing the audit. At this meeting it was discovered that the owner had still not raised the wages to the minimum award wage. He believed that he could pay people according to how long they have worked with him, not according to their relevant skill level as the Textile Clothing, Footwear and Associated Industries Award sets out. The starting wage for an employee was lower than even the training wage under the award and the new employee was a skilled machinist.

Once again the maker was advised that he must comply with the award provisions. During this visit compliance officers also met with the workers. Most of them were non-communicative and it appeared they may have been fearful of the boss. Many of the workers were Vietnamese, however ECA provides funding for outworker outreach and so we were able to provide language support so we could effectively communicate with them about Ethical Clothing Australia accreditation and the audit process. Two workers were very keen to speak out about their low wages and wanted information about what they are entitled to under the award, and they were informed about their rights.

The maker was advised that he must raise many of the workers' wages to the minimum award rates. He argued that he cannot pay new starters the same as what he pays people who have worked for him for a long time. It was explained and reiterated that he must comply with the award minimum requirements.

During this audit he was reminded again about the condition of the factory being below the Victorian OHS standards. The owner disputed this and said the workers were happy eating their meals in the filthy area provided. The compliance officer subsequently reported the workplace to WorkSafe and they did an inspection and issued 5 Provisional Improvement Notices.

Once again the owner of the factory would not allow us to come back and finish the audit. The company with the pending application were impatient to get their accreditation finalised so we asked them to speak to the company once more regarding their legal obligations.

Eventually we received a call from the maker. He has now rectified the wages, the OHS issues have been fixed and now we are waiting for a suitable time to speak to the workers again to get them to verify that the company is operating within the legal parameters of the Award, the Fair Work Act and the Victorian OHS Act 2004. We also want to make sure that their personal leave is not paid out and that they receive the 17 ½ % loading they are entitled to when they take holidays during the Christmas close down period.

Case study 2

A worker contacted the TCFUA who was told of a workplace that was in a very bad condition. The compliance officer had called by to find a decrepit looking shop with approximately 20 machinists inside sewing uniforms. The workers were crammed into a small space. The compliance officer said that she noticed as we looked in that the label on the uniforms was an accredited label. She had left quickly because the owner of the factory was quite aggressive.

The compliance officers contacted the accredited company and called for a meeting to discuss the factory and which of its makers we believed might have given the work to this factory. The label's representative were shocked that one of its makers was giving out work to this company because the maker had been audited and was BOR registered but no mention of the small shop front factory.

The company which gave the work to the sweat shop were told by the accredited company that it must be complaint to continue to get work. The accredited company insisted that the maker fix the problem within 24 hours and become fully compliant.

We also had concerns about the 20 machinists who were working in the small sweat shop and we asked that if there is enough work for the company to give out, could the maker employ those machinists in house with the label's support. Within 1 day the 20 machinists were working hard in the 1st tier maker's factory and enjoying the Award wages and conditions they are entitled to.

Case Study 3

During a compliance audit of a small factory, it was discovered that the work records of a large company who had a pending accreditation were barely legible. The company scribbled what they wanted on a piece of paper with no names, BOR detail, ABN number, garment specifications or minute rate. This was clearly a breach of Schedule F of the Textile Clothing Footwear and Associated Industries Award 2010. The small factory said they always received orders in this way from the label.

This made it difficult to educate the smaller factory about how they should prepare their work records for giving work to their makers so we met with the first tier company.

During the initial meeting with compliance officers it was explained what is required by law to be on the work record. We gave the company copies of the work record template and we explained that they could use because it includes all the elements that must be on a work record. We met with them twice more before their records were compliant because they wanted to make the records specific to their products.

Following on at a subsequent visit it was identified that the work record had been rectified and they had used the templates from the Award Guide as a guide but has streamlined them to suit their company- including their logo, standard product specifications and pricing. The first tier company is also now educating all its makers and assisting them to make their work orders compliant too.

Case Study 4

A school Uniform label identified one of its makers as a principal. During the compliance audit it became apparent that the maker was an Outworker.

The Outworker asked the compliance officer to assist her to employ someone because she believed that if she was an Outworker she would not receive any work from the uniform company. She mistakenly believed that if she got an ABN number and employed her husband as a casual worker, she would not be regarded as an Outworker.

It was explained to the outworker that she would not lose work or be penalised because of her status as an Outworker. We also explained that setting up a sham working arrangement is against the law and would not change her status as an Outworker. Compliance officers met with the company and explained to them that she is an Outworker and after looking at the value and volume report the company had sent us, we could see that she was regularly receiving 20 hours a week work.

The company agreed to transition her to Outworker status and she signed an agreement for 20 hours a week work with the company. A meeting was arranged with the company and the Outworker where the new arrangement was discussed with language support for the Vietnamese speaking Outworker so that all issues and potential problems were raised and discussed and so the Outworker could see that the company was acting in good faith.

The Outworker is happy with her new working arrangements and she is now looking forward to a 2 week paid break over the Christmas holiday close down period.

Appendix B

HOMEWORKER CASE STUDIES

Ethical Clothing Australia provides advice and assistance to outworkers with the support of TCFUA outworker outreach officers. Information provided about outworker's legal entitlements has assisted outworkers in relation to concerns around pay and conditions. This has resulted in them receiving decent wages and entitlements. Since January 2010 more than 1400 outworkers have been provided with advice or assistance, either through face to face visits and over the phone.

In addition ECA provides funding for outworker newsletters, promotional materials and events to keep outworkers informed of ECA accreditation program and their pay and entitlements.

See case studies below.

Case studies

1) *School Uniform manufacturer*

Two suppliers to a school uniform manufacturer used to give out all their work and treat the outworkers as contractors. As contractors they were paid for each piece of clothing rather than by the hour so as a result they were paid less than the Award rate of pay. In addition they were not receiving their superannuation, Work Cover and other entitlements.

After the school uniform company applied for accreditation, the TCFUA Outreach officers and Compliance officers assisted the company to be compliant. Now the suppliers employ some of their outworkers to work in the factory and they are all receiving their Award rate of pay & entitlements.

Other outworkers who got work directly from the principal school wear company such as outworker A and outworker B are now treated as outworker employees. An outworker said that he is happy to be a full-time outworker, which allows him to work 38 hours and receive sick leave, holidays leave, Super and WorkCover, etc.

2) *Fashion Label Manufacturer*

- Company A

A husband and wife working from home for many years for company A were getting paid by the piece rather than the hours they worked as required under the Award. The union worked closely with the company to get the agreement signed as outworkers. They are now getting regular work and the minimum wages with superannuation and holidays which they never dreamed of getting.

Another couple of outworkers who supply company A is now get work secured weekly; they don't have to worry about next order. In the past getting work involved some kind of auctioning, where whoever agreed on the lowest price got the work.

- Company B

A highly skilled machinist, who had previously worked for a lot of labels, had in the past few years worked solely for the Fashion Label manufacturer. Company B had employed him as a contractor and paid him above Award wages but without any superannuation or Work Cover. The company only put him on the Board of Reference list when the union checked the value and volume records.

3) *Well known Fashion Label Manufacturer*

- Company C

Company C were supplying a well-known national fashion label who was seeking accreditation. Two outworkers for Company C now work part-time at home with entitlements and they are now paid at skill level 3. This came about through the TCFUA compliance officer negotiating with company C to ensure they were paid the right pay and as a result their wages were moved from level 2 to level 3.

An outworker who used to work for company D, after the company closed she then transferred to company C. When the outworker transferred to company C the TCFUA officers made sure she received her Award pay and entitlements. She is now working part-time, with set hours, in level 3 including entitled holidays, superannuation and work cover.

A supplier to company C had employed an outworker as a contractor and was being paid below the Award rate of pay and not receiving any superannuation, Work Cover or other entitlements. They are now receiving the Award wage and their entitlements including superannuation.

Another supplier had employed outworkers as contractors and were not paying the Award rate or receiving superannuation, Work Cover or any entitlements. All of his outworkers are now working in the factory on Award pay with their entitlements as part time or casual workers.

4) *Fashion Label Manufacturer*

Most of the makers on the Fashion Maker supply chain do not use outworkers except for company E. An outworker who worked for company E used to be treated as contractor and so was paid below the Award rate and wasn't getting their entitlements. After the TCFUA outworker outreach team visited the worker and TCFUA Compliance officer worked with the company. The outworker is being treated as an employee and is receiving good pay and entitlements.

5) *Defence clothing manufacturer*

An outworker worked for a Defence clothing manufacturer, who was seeking accreditation, worked for more than 10 years without receiving his rights and entitlements and was treated as a subcontractor. The TCFUA compliance officers and outworker outreach officers came to audit and talked to the company about their obligations about employing this outworker. The outworker is now receiving at least 15 hours work per week. His wage has been kept at \$25/hour plus all the entitlements as a part timer who worked in the factory.

6) *Fashion Label Manufacturer*

A compliance officer found 3 outworkers who worked for Company F who supplied a well-known fashion label were treated as contractors on a piece rate without entitlements and being paid below the Award wage. They have been transitioned to outworkers to receive regular work with the Award pay and their entitlements.

An outworker for works for a supplier to the Fashion Label was treated as a contractor and was paid below the Award rate of pay and without benefits. Following intervention from the union he is now treated as an outworker and now receives 20 hours of work every week and is entitled to holidays and superannuation.

Appendix C

INDUSTRY TRAINING AND EDUCATION OUTREACH

Below is a list of examples of how ECA provides training, information, education and resources to the industry. Through these activities, the organisation aims to raise awareness of the Ethical Clothing Australia Program and provide information about The TCFAI Award and worker entitlements to industry representatives, government and students.

Industry training

Since January 2010 the TFIA have conducted more than 40 training sessions for industry participants regarding the ECA accreditation process and information regarding the 2010 Textile, Clothing, Footwear and Allied Industries Award (TCFAI Award). Training sessions have taken place in Victoria, NSW & Queensland.

The TFIA developed a *Plan for People: HR Strategy and ECA Accreditation*' training program for industry to provide information on the TCFAI Award (2010), the National Employment Standards, forms and records for maintaining compliance, and human resources and OH&S. Participants were also introduced to the process of ECA Accreditation and the benefits for both supply chain management and brand promotion.

Clustering

The TFIA and Australian Fashion Council clusters were started in 2010, through the Fashion Export Cluster. A TCF Cluster Manager was appointed mid-2011, to establish clusters in Victoria, New South Wales, Queensland and Western Australia. The clusters cover a wide range of industry aspects, including Digital printing, fashion design, performance wear and sustainability to name but a few.

The clusters have been used to deliver Award & Operational training their members, starting with the Fashion Design Group.

Textile & Fashion Hub

A new facility for small to medium sized enterprises in the TCF sector, the Textile & Fashion Hub, was opened on March 30 2012. The Hub is collaboration between the TFIA, Kangan Institute in Melbourne and AusIndustry. Industry training is being conducted through the Hub, by the TFIA through the Plan for People forums being held monthly.

Award Guide

The Award Guide has been developed by Ethical Clothing Australia (ECA) to help businesses understand how to comply with the Textile, Clothing, Footwear and Associated Industries Award 2010. The Guide was drafted by an employment barrister with the assistance of ECA staff and HWCC members.

The Award Guide was also translated into Vietnamese and Chinese, given many business owners and workers in the industry primarily speak these languages. The translations were reviewed to ensure they were accurate and readable for typical Chinese or Vietnamese reader. The TCFUA assisted with the review of Vietnamese version and Asian Women at Work with the Chinese version.

The Award Guide is available to download from our website which saves us money but also ensures industry have the most 'up to date' version. We arranged for a limited number of printed copies in Chinese and Vietnamese as well as English.

Education

Presentations

In terms of industry education we aim to speak to a broad range of stakeholders from university graduates to young designers, local manufacturers to major retailers as well as government representatives at both a state and federal level.

Since January 2010 we have given nearly 60 presentations to students and industry representatives of which many are listed below. We have delivered lectures and presentations to students at universities and TAFEs in Victoria, NSW and Queensland.

These presentations enable us to educate students as well as inform TCF industry representatives about the issues facing workers, the benefits of Ethical Clothing Australia and the support it offers the industry.

Education: Colleges & Universities

- The TFIA gave a presentation to 35 students at *RMIT Catholic Education* in Melbourne in August on current trends in employment for fashion & TCF sector, including Ethical Clothing in August 2012.
- The ECA National Manager gave a presentation to around 15 fashion design students at Holmsglen TAFE in Melbourne in August 2012.
- The ECA NSW Accreditation Advisor gave a presentation to 30 fashion & design students at *St George TAFE in Kagorah* in Sydney in September 2012
- The ECA NSW Accreditation Advisor gave a presentation to 50 fashion & design students at *Hunter Institute TAFE* in Newcastle in September 2012
- The TFIA gave a presentation to 12 final year students and 2 teachers at Ultimo TAFE.
- MSIT Mt Gravatt TAFE (QLD) - 3 presentations, including 2 presentations at an industry seminar with an audience of 250 industry members and students.
- University of Technology Sydney, fashion students - 1 presentation
- Melbourne University, marketing and business students - 1 presentation.
- RMIT TAFE (MELB), fashion and marketing students, 7 presentations (over 100 students were presented to in total).
- Macquarie Fields TAFE. (SYD) - 2 presentations
- Victoria University (Melbourne) - Community Development students
- RMIT TAFE (Melbourne) Sustainability Evening Lecture Series – 2 presentations
- Coogee Public School (Sydney) – Presentation at the ‘*spring into summer*’ event, attended by over 200 Coogee residents. A student fashion show took place with participants from UTS, UNSW, TAFE Ultimo and Whitehouse Institute, and prizes were donated by ECA accredited brands.
- RMIT TAFE Brunswick Campus – 4 sessions held with Marketing and Fashion Design Students, attended by a total of 180 students across the 4 sessions
- Melbourne University – Marketing & Society Students, attended by approximately 100 students.
- Newcastle TAFE – Fashion Students
- In addition, the Industry Liaison Officer also conducted two lectures in the Sustainability Lecture series, one at RMIT University Brunswick, and one at University of Technology Sydney (UTS), which bring industry attention to issues of sustainability and provide an opportunity to promote ECA.

- RMIT TAFE Brunswick Campus – 4 sessions held with Marketing and Fashion Design Students and was attended by over 180 students
- Melbourne University to 180 Marketing and Society students
- Newcastle TAFE fashion students

Industry

- The TFIA gave a presentation to 100 industry participants at the *International Sourcing Fair* in Sydney in November 2012.
- The TFIA gave a presentation to 90 industry participants at an Export Cluster Event in NSW in September 2012.
- The ECA Media & Communications Coordinator gave presentations to *RMIT School of Fashion & Textiles* students on February 28 2012 for approximately 20 students
- The ECA Media & Communications Coordinator gave presentations to *RMIT School of Fashion & Textiles* students on February 29 2012 for approximately 60 students
- The NSW ECA Accreditation Advisor gave a lecture to the Design class of *Macquarie Fields TAFE*. There was around 40 students and teachers in attendance.
- The ECA media officer made a presentation on ethical manufacturing at a NSW government sponsored seminar to around 40 people representing largely indigenous owned small to medium sized TCF businesses.
- The ECA National Manager spoke at a Social Sustainability seminar at Fashion Exposed conference in Melbourne before around 50 people.
- The ECA National Manager spoke to around 40 trade union members at a TCFUA state conference about the ECA program and the launch of the *Meet Your Maker* campaign.
- An event, *Building Consumer Confidence in Textile & Fashion Sustainability*, was hosted by the TFIA and NRA (National Retailers Association). The forum was aimed at building awareness of Sustainability issues in the TCF industry. The ECA, National Coordinator gave a short presentation on labour compliance and ECA accreditation.
- A presentation was given to approximately 80 designers and manufacturers in Queensland. The event titled *Innovation Runway* was organised by the Enterprise Connect Creative Industries Innovation Centre.
- In April the TFIA gave a presentation *applying the Fair Work Principles through Sustainable Supply Chain Management*, at the Defence Materials Organisation (DMO) Clothing Forum. The presentation outlined the ECA accreditation process. Jeff Willing, from DEEWR also attended the event presenting information about the Fairwork Principles.

Public Procurement

Australian Government TCF procurement is a major driver of accreditations and source of work for the local TCF industry.

Government procurement website and public materials

At the ECA we undertook a review of our website and public materials to ensure that TCF businesses bidding for Commonwealth procurement contracts were aware of their obligations regarding accreditation with ECA. During the review we worked closely with the Defence Materials Organisation (DMO) who is responsible for procurement for the Defence Department.

A key concern for DMO was ensuring they had an up to date and accessible list of local TCF business that satisfy the criteria of either seeking accreditation or are accredited. The DMO wanted to be able to identify companies who were manipulating the system to win contracts such as winning a tender then not completing their accreditation application or becoming de-accredited for non-compliance after contract was awarded.

Those companies manipulating the accreditation system without any commitment to become accredited or maintain accreditation simply disadvantage genuine applicants for government contracts. Also it isn't an effective use of ECA resources in terms of time spent processing applicants who are highly unlikely to be accredited.

In response we reviewed and updated our website along with the ECA accreditation guidelines and our public brochure on government procurement to ensure they are clear and easy to understand.

We have completed the revamp of the government procurement website so that Commonwealth Government officials involved in TCF procurement can now verify the accreditation status of TCF companies.

A critical element of our upgraded website is the development of a 'secure' web portal for registered users from government entities to check on companies' accreditation status. Via this secure section, authorised users will be able to view and download lists of currently accredited and pending companies who have applied for government TCF contracts for the purposes of verifying their accreditation status.

The website was developed in collaboration with DMO and AusIndustry, who allocate SCP grants to TCF businesses, as they both require applicants to be accredited or seeking accreditation. As a result of that feedback we made modifications to our secure website including adding ABN numbers, unsuccessful pending applicants and de-accredited companies.

We have also developed a 'disclaimer' for registered users who sign up to help ensure that information from the secure webpage are not disseminated beyond those approved users.

Tender training for Defence TCF procurement contracts

We have also given presentations to industry representatives at Defence Materials Organisation industry briefing regarding TCF procurement.

The TFIA has collaborated with the TCFIIC's TCF Advocate and the Defence Materials Organisation to deliver a number of tender training workshops to industry in Victoria, Queensland and New South Wales.

Industry and community events

Representatives from ECA, TCFUA and TFIA have all given presentations or attended events to raise awareness of outworkers and promote Ethical Clothing Australia.

We have participated in major fashion shows and industry events including Fashion Exposed, L'Oreal Melbourne Fashion Festival, Perth Fashion Week, Rosemount Australian Fashion Week in Sydney, Mercedes Brisbane Fashion Week, Perth Fashion Spring Festival, Design Made Trade Show, Melbourne Spring Fashion Week and the Clothing Exchange National Clothing Swap.

We have also participated in community events including Fairtrade Fortnight, Fair@Square Ethical Festival and the Melbourne Sustainable Living Festival.

Appendix D

SIGNATORY BUSINESSES TO PART 1 OF THE CODE AS AT 20/02/2013

1. Abbey Bridal
2. Adam Larissa Fashions
3. Aird
4. Alexander Michaels Clothing for Men
5. Anita Holland's Boutique
6. Anthea Crawford Australia
7. Apricot
8. Armondilloxtreme
9. Australian School of Mountaineering
10. Australian Surfing Headquarters
11. Barrakets Fashion Centre
12. Batalin Boutique
13. Bay Collection Boutique
14. Berrima Natural Australia
15. Best & Less Retail Stores
16. Big W Discount Department Stores
17. Billingham's Menswear
18. Bonza Brats
19. Born in the Blue Mountains
20. Boutique Capri
21. Bowral Country Sports
22. Butterfly xx
23. BW Benson Fashion
24. Carla Zampatti
25. Cascade Butterfly
26. Catherine Smith t/a Duck Creek Clothing
27. Christine Coon t/a Country Chique Boutique
28. Cinnamon Boutique
29. City Classics
30. Clare Ellen Fashions
31. Clothing Haven Menswear, Ladieswear & Surfwear
32. Corfu Blue
33. Country Road
34. Cue & Co
35. CW & AE Bird t/as Ultimate Underwear
36. David Jones
37. Dotti
38. D'Vine D'Zine
39. Eda Michelle Designs
40. Emma James
41. Esprit
42. Events Fashion
43. Eve's of Mittagong
44. Fandango
45. Fetts
46. Final Touches
47. Flanagans Menswear
48. Fuller Figure with Style
49. G Retail
50. Galleria Boutique
51. General Pants Group
52. Gloucester Town and Country
53. Have to Shop (Zena Sutton)
54. Herro International (Mens Avenue)
55. Hunter Gatherer
56. Infinite Abundance t/as Visage Mens Boutique
57. J.H. Barsby & Sons
58. Jeans West
59. Jim Mills/John Douglas Menswear
60. Jiva
61. Jodi of Umina
62. John Grahams Mens Wear
63. John Santalucia t/as Tainey Boutique
64. Jory Family Trust t/as Enhance U
65. Joseph's Menstore
66. Jourdan Fashions
67. K Mart
68. Kennedy's
69. Kerry's Klothes
70. La Boutique Fantasque
71. Langcru PL t/as Amazon Fashions
72. Leura Mall Outback Clothing
73. Looking Class
74. Lowes
75. Man to Man
76. Marves Shoppe
77. Matilda Janes C & G Enterprises
78. Mays Ladies Fashion
79. Mr Sports
80. My Style Boutique
81. Myer
82. Nick Brown Menswear
83. Noaron / XS Surf t/as Woopi Bizare
84. Noni B
85. Nunee Boutique
86. Oliver NSW
87. Orientique Byron Bay
88. Paleface
89. Pat Kearins' Mensland
90. Peg Hargreaves Fashion
91. Peter Pan Baby & Childrens Wear
92. Petl & Co
93. Pink Pomegranate t/a Treehouse Childrens Décor
94. Pizazz Boutiques
95. PJ's Warehouse
96. Plumage for Clothes

97. Posh & Chic
98. Pretty Girl Fashion Group
99. Pretty Things
100. Reilly's Quirindi
101. Review Australia
102. Rifoba t/as Heppy's
103. RM Williams
104. Robinson's Department Store
105. Robyn Hunter
106. Robyn's Lets Dance
107. Roger David
108. S M Brands
109. Shebu Contemporary Fashion
110. Sheike & Co.
111. Sheppards of Albury
112. Shoppe Two Ten
113. Simona
114. Simone Louise
115. Smyths Specialty Store
116. Snellings Clothing Store
117. Specialty Fashion Group
118. Sportsgirl
119. Stewart's Menswear
120. Sussan Corp
121. Suzanne Grae Corp
122. Swans of Tumut
123. Sweethearts Bridal
124. Syndicate
125. Synergee Fashion Co.
126. Target
127. The Avenue Bridal Boutiqe
128. The Discovery Group
129. The Just Group
130. Totalook Clothing
131. Trachelle Boutique
132. Trumps Boutique Leura
133. V & M Wear t/as Monza Mens
134. Vince Maloney & Co.
135. Vivian Chan Shaw
136. Von Troska
137. Wahney Boutique
138. Webster Holdings (Jigsaw, David
Lawrence)
139. Who Knows Where
140. Witchery Fashions
141. Zig Zag Boutique at Yamba

Appendix E

ACCREDITED BUSINESSES TO PART 2 OF THE CODE AS AT 20/02/2013

1. A Plus Schoolwear
2. Acline
3. ADA
4. Akubra Hats
5. Alma Fudge
6. Ambassador Clothing
7. Ampersander
8. Art Kabanyana
9. Aussie Mills Embroidery
10. Australian Contract Clothing
11. Babylon Industries
12. Baxter Boots
13. Blue Gum Clothing
14. Buxwear
15. Cameron James Dixon Design
16. Candy & Lace
17. Carla Zampatti
18. Cash's
19. Christie's
20. Collette Dinnigan
21. Cue
22. Dayoub Clothing
23. Dina Corporate
24. DNA Manufacturing
25. Drummond & Kindred
26. Elegant Knitting Co
27. Elliott Australia
28. Fixed Race
29. Fraser & Hughes
30. Gideon Shoes
31. Ginger & Smart
32. Harmony Fashions
33. Humphrey Law
34. J Robins Manufacturing
35. Jets Swimwear
36. Kitbag
37. Lisa Ho
38. LMB Knitwear
39. Lydra
40. Mattt
41. Melbourne Made
42. Merino Country Australia
43. Metalicus
44. Mont Adventure
45. Mountcastle Hats
46. Mr Charles
47. Mr K
48. NathanPaul
49. New Model Beauty Queen
50. Nico Underwear
51. Nobody
52. Novatek International
53. Novo Socks
54. Oliver Footwear
55. Pacific Brands Workwear Group
56. Perry Cutten
57. Platypus Outdoors
58. Protop Australia
59. Puma Australia
60. Qualitops
61. Queensland Swimwear Company
62. Redback Boot Company
63. Review Australia
64. Rossi Boots
65. Snugglerite Industries
66. So Stella
67. Spunky Bruiser
68. Stockpile
69. Tate & Lawson
70. Tatyana Ariyan Design & Co
71. The Ark
72. The Social Studio
73. Totally Corporate
74. Tote Systems Australia
75. Tuffa Workwear
76. Tuffys & Tuffetts
77. Urbanearthwear
78. Valour Apparel
79. Wildneress Wear
80. Woolerina

