Australian Nursing and Midwifery Federation

ANMF SUBMISSION TO THE SENATE EDUCATION AND EMPLOYMENT LEGISLATION COMMITTEE ON THE PROVISIONS OF THE *FAIR WORK (REGISTERED ORGANISATIONS) AMENDMENT (ENSURING INTEGRITY) BILL 2019*

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Australian Nursing & Midwifery Federation

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INTRODUCTION

1. The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 275,000 nurses, midwives and carers across the country.

2. Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.

3. Our strong and growing membership and integrated role as both a trade union and professional organisation provides us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.

4. Through our work with members we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.

5. The ANMF thanks the Senate Education and Employment Legislation Committee; (the Committee) for providing this opportunity to comment on the provisions of the *Fair Work (Registered Organisations) Amendment (Ensuring Integrity) Bill 2019* (the Bill).

6. We ask the Committee to read our submission in conjunction with that of our peak body, the Australian Council of Trade Unions. The ANMF supports the submissions of the ACTU with respect to the matters not addressed in this submission. The ANMF submission:

    - provides a general response to the Bill
    - responds to Schedule 1: Disqualification from Office
    - responds to Schedule 2: Cancellation of Registration and Alternative Orders
    - Draws attention to the work of the ANMF that may be seriously negatively impacted if the Bill is passed

GENERAL COMMENTS ON THE BILL

7. In his second reading speech on the Bill, the Attorney-General, Minister for Industrial Relations and Leader of the House, Christian Porter asserted:

> *'The bill strikes the appropriate balance between ensuring that registered organisations and their officers act with integrity and obey the law, without affecting the vast majority of organisations and their officers that do the right thing and work hard to represent their members and act in their best interest.'*[1]

8. The ANMF submits in the strongest possible terms that it does not agree with the above assertion. On the contrary, the ANMF submits that enacting the Bill would seriously diminish the ability of unions to represent and act for members and consequently poses a significant threat to members' rights to freedom of association and to participate in democratic organisations.

9. The ANMF submits, in broad terms, that the Bill is misconceived for a range of reasons.

   (a) The Bill is politically motivated and is not evidence or policy based. The current regulatory regime applicable to unions is adequate to deal with inappropriate conduct and to ensure integrity of the operation of unions and officers. The motivation for the Bill appears to be to prevent unions from working to protect people at work and improve living standards.

   (b) The Bill is purported to be comparable to the provisions that apply to companies and company directors. This is not correct; in many instances the Bill imposes more onerous standards than its corporate equivalent or introduces standards and sanctions that have no corporate equivalent.

   (c) The Bill is inconsistent with international human rights law and is incompatible with Australia's commitments under the ILO's Freedom of Association and Protection of the Right to Organise and Collective Bargaining Convention. The Parliamentary Joint Committee on Human Rights found that every Schedule of the Bill is incompatible with the right to freedom of association.[2]

   (d) The Bill fails to provide procedural fairness and natural justice. It creates mandatory obligations on the Court to make certain orders and limits Court discretion. In some instances the onus of proof is reversed and permits orders to be made in the absence of judicial findings. The outcome of these provisions will result in excessive, harsh and potentially discriminatory outcomes.

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[1] https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22chamber%2Fhansardr%2Fce759aa1-47bf-467d-a58b-3bf640990032%2F0085%22

[2] Parliamentary Joint Committee on Human Rights, Report 12 of 2017 (28 November 2017). The Committee has reiterated its views in respect of the 2019 version of the Bill: Report 3 of 2019 (30 July 2019)15

(e) The Bill expands the scope of standing to make applications for orders for a 'person with sufficient interest'. The term is interpreted as an interest beyond that of an ordinary person. It is foreseeable that an employer or employer organisation would have standing to make application for orders under the Bill. This is open to manipulation and being used for political and industrial purposes beyond the purported scope of the Bill.

(f) The Bill establishes a disproportionate burden on unions, both in regulation of their operations and sanctions that can be imposed. Australian unions are already heavily regulated to ensure compliance with governance mechanisms and a wide range of sanctions can be imposed. Existing sanctions include disqualification of officers, cancellation of registration and penalties up to $630,000. In addition, the Bill would create additional legal cost burdens on unions due to the increased scope of applications that can be made against organisations and officers.

(g) The concept of 'streamlining' procedures is used as a justification for the provisions of the Bill.[3] This is expedient and results in the Bill being weighted in favour of the Court making orders against unions and union officers that have serious consequences for those organisations and officers.

THE CURRENT REGULATORY REGIME

10. We note that extensive regulation to police registered organisations already exists in the *Fair Work Act 2009* (FW Act) and the *Fair Work (Registered Organisations) Act 2009* (RO Act). In particular the RO Act provides for regulation including:

- Prescribing and regulating the rules of organisations;
- Determining membership of organisations;
- Regulating for the democratic control of organisations through elections;
- Imposing numerous and extensive reporting and accounting requirements on organisations; and
- Regulating the conduct of officers and employees of organisations and branches of organisations, including in prescribed circumstances, the capacity to deregister an organization or disqualify an officer.

11. The FW Act provides regulation including, most relevantly, regulation of enterprise agreement making, bargaining orders and provision for taking protected industrial action. Contraventions of civil penalty provisions can result in substantial penalties for both officers and organisations. The current maximum for a serious contravention can be up to $126,000 for individuals and $630,000 for bodies corporate.

[3] Second Reading Speech, 4 July 2019

12. The RO Act regulates procedures for electing officials and creates reporting requirements to ensure union elections are conducted in procedurally appropriate manners. The election of officers and scrutiny of the election process is a key democratic platform for the operation of unions and ensures members are represented by democratically elected officials.

13. The ANMF also has reporting obligations under the *Commonwealth Electoral Act 1918*, with respect to its status as a 'political campaigner' under that legislation. There are penalties under that Act for failing to disclose expenditure incurred for the dominant purpose of creating or communicating electoral matter.

14. The ANMF is governed by its own Federal Rules which are required to meet the provisions of the RO Act and cannot be changed without the endorsement of the ANMF Federal Executive and the approval of the Fair Work Commission. The operation of union rules in conjunction with the legislative framework of accountability and transparency appropriately serve the purpose of protecting members and supporting their democratic rights to organise.

15. The ANMF agrees it is entirely appropriate for unions to be required to operate in a way that is accountable, transparent and of an appropriate standard expected by their membership, the public and regulatory authorities. The ANMF submits that the current regulatory scheme sets in place high levels of reporting accountability, processes for conducting various activities and sanctions for contraventions that do not need to be expanded upon in order to meet those expectations.

SPECIFIC COMMENTS ON THE BILL

Schedule 1: Disqualification from Office

16. Section 215 of the RO Act provides that a person convicted of certain 'prescribed offences' is ineligible to be a candidate, or to be elected, or to hold an 'office' in an organization, unless the conviction and any term of imprisonment was more than 5 years ago. These provisions are obviously intended to ensure persons with relatively recent serious criminal convictions not be able to participate in the activities of trade unions.

17. However, the Bill seeks to expand the definition of a prescribed offence to now include an offence against a designated law. The following are designated laws:

    (a) The RO Act;

    (b) The FW Act;

    (c) The *Building and Construction Industry (Improving Productivity) Act 2016*

    (d) The *Work Health and Safety Act 2011*;

    (e) Each State or Territory OHS law (within the meaning of the *Fair Work Act*);

18. ANMF does not support the proposals in the Bill that are intended to provide the Registered Organisations Commissioner and the Courts with wide latitude to prevent members of unions from standing for, or holding an elected office in their union. The ANMF is strongly of the view that only union members should determine who and who does not represent them and accordingly the democratic functioning of registered organisations must, where possible, be free of interference by public authorities be they tribunals, courts or the bureaucracy.

19. The proposed restrictions to the democratic rights of members contravenes Article 3 of the *Freedom of Association and Protection of the Right to Organise Convention 1948*.[4]

20. The ILO Committee on Freedom of Association has made the following observations on the rights of organisations to organise their administration:

Legislative provisions which regulate in detail the internal functioning of workers' and employers' organizations pose a serious risk of interference by the public authorities. Where such provisions are deemed necessary by the public authorities, they should simply establish an overall framework in which the greatest possible autonomy is left to the organizations in their functioning and administration. Restrictions on this principle should have the sole objective of protecting the interests of members and guaranteeing the democratic functioning of organizations. Furthermore, there should be a procedure for appeal to an impartial and independent judicial body so as to avoid any risk of excessive or arbitrary interference in the free functioning of organisations. [5]

21. The proposed grounds for disqualification are mandatory for serious criminal offences under a Commonwealth, State or Territory or another country punishable upon conviction by imprisonment for life or a period of 5 years or more[6] is potentially discriminatory and also excessive. Automatic disqualification for offences that may have no bearing on the individual's suitability to hold office is harsh and excessive.

22. People who have come to Australia from countries with repressive legal systems or excessively harsh criminal codes may be unfairly excluded from office. The application of this ground could result in a range of highly discriminatory outcomes. For example, a person granted refugee status in Australia, could be found guilty in absentia of a criminal offence attracting a sentence of 5 years or more from their country of origin. Such a person would under the proposed laws be ineligible to hold office or to be elected as a union officer, regardless of the nature of the conviction.

23. The potential for a person to be disqualified from a leadership position following a minor or technical contravention of civil law is excessive and grossly disproportionate. Disqualification from office has serious personal, financial and career implications for the individual and interferes with membership's right to choose their leadership via the democratic means of the union.

24. A further ground for disqualification is a determination that a person is not a fit and proper person.[7] The grounds that can establish a person is not fit and proper can include refusal, revocation or suspension of a right of entry permit or WHS entry permit, certain criminal or civil proceedings or any action by a government agency against the person, or committing an offence punishable by two years or more.

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[4] ILO Convention 87

[5] Freedom of Association: Compilation of decisions of the Committee on Freedom of Association, ILO.

[6] Schedule 1, Item 8 s212(aa)

[7] Schedule 1, Item 11 s223(5)

25. The 'fit and proper person' grounds are extremely broad and give ample scope for the pursuit of personal or political agendas. There is no assessment of the relevance of the misconduct to the suitability to hold office.

26. Many office bearers in the ANMF, including Branch Council members who offer their time on a voluntary basis are registered nurses and midwives. As such, they are subject to the *Health Practitioner Regulation National Law Act 2009* (the National Law) which requires certain criteria and standards be met to both obtain and maintain registration as a health professional. Under the National Law, a nurse or midwife could be subject to investigation, allegations and sanctions for conduct in connection with their professional practice, which may involve consideration of whether the nurse or midwife is a fit and proper person under the relevant professional standards. A finding, or merely an allegation could under the proposed legislation result in a registered practitioner being disqualified from office, regardless of whether the finding is relevant to their work as an elected union officer.

27. Disqualification of a union officer on the basis of assessment of being a fit and proper person is one that should be conducted via the internal mechanisms of the union's governing body. Expanding the standing and grounds for disqualification of individuals is dangerous and open to manipulation.

28. The ANMF considers the proposed expanded grounds for disqualification of officers are excessive, disproportionate to the problem to be addressed and carries the potential to produce discriminatory and anti-democratic outcomes.

Schedule 2: Cancellation of Registration and Alternative Orders

Current legislation and proposed onus of proof and findings of fact

29. Section 28 and section 29 of the RO Act in their present form provide a wide ranging discretion on the Federal Court to cancel the registration of organisations. The Court may also make orders adapted to address a variety of circumstances that may confront the Court in the context of a cancellation of registration application.

30. Proposed section 28J provides that the Court must cancel registration if certain grounds are stablished. The ANMF is concerned about the lack of Court discretion and the reverse onus of proof in these provisions. An organization must demonstrate why it should not be deregistered. The current legislation requires the Court to determine whether it would be unjust to cancel registration having regard to the gravity of the matters constituting the ground for action.

31. Under proposed sections 28(C)(5), 28(F)(2) and 28(G)(3) the Court can be satisfied that grounds for cancellation are made out on the basis of a 'finding of fact in proceedings in any court'. This removes the obligation from the Federal Court to make findings of fact before proceeding to make orders of significant consequence.

32. The efforts to provide a 'streamlined' approach to cancellation of registration result in a loss of natural justice and procedural fairness. The impact of cancellation of registration is significant and impacts on potentially many thousands of individuals' right to be members of their chosen union.

For Courts to be required to take mandatory action of such a drastic nature, the onus of proof should be on the applicant and subject to judicial findings. It is expedient to propose legislation with such serious consequences on the basis of 'streamlining' procedure.

33. In stark contrast is section 1317E of the Corporations Law which requires express declarations to be made by a Court thereby requiring the Court and the parties to directly address the question of a finding appropriately framed and identified. (See section 1317E (2) of the Corporations Law).

34. Further, the proposed cancellation of registration scheme is not compatible with the human rights principles of freedom of association and would place Australia at the extreme of legislative regimes. In the opinion of The International Centre for Trade Union Rights

> *'None of the industrialised democracies we surveyed entertain anything approximating such a punitive regime for the deregistration of trade unions.'*[8]

CONCERNS WITH THE GROUNDS FOR CANCELLATION OR MAKING ALTERNATIVE ORDERS

35. Proposed section 28C(b)(ii) provides new grounds for orders where 'affairs of the organisation, or a part of the organisation, have been or are being conducted in a manner that is contrary to the interests of the members of the organisation or part as a whole'.

36. For a union, such as the ANMF with branches in each state and territory and a large and diverse membership, the above ground is of particular concern. For example, the ANMF has multiple enterprise agreements covering different groups of employees who are all employed by the same federal system employer. Employee groups may be identified by workplace, region, state or territory or across states and territories. Given a range of factors, it is not uncommon for enterprise agreements with the same employer to reflect inconsistent wage and condition outcomes. It is conceivable under this proposed ground that inconsistent outcomes (reflective of the particular circumstances of each agreement) could form the basis for an application.

37. It is not uncommon for employees covered by a single enterprise agreement to have conditions and wages that vary. In determining whether to accept a proposed enterprise agreement, members are often asked to accept a wage outcome that favours one group of members over another. This may for example be to uplift wages for a disadvantaged classification of employees which is not applied to other employees. The FW Act provides mechanisms for approval of agreements that ensures this process is conducted fairly.

38. The ANMF operates on a democratic basis in accordance with its rules. It is the nature of collective organisations to work to achieve outcomes that are in the interests of members and to determine by its own democratic processes whether compromise is accepted.

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8 Daniel Blackburn and Ciaran Cross, 'Fair Work (Registered Organisations) Amendment (Ensuring Integrity) Bill 2019' International Centre for Trade Union Rights on behalf of the Australian Council of Trade Unions, July 2019,16

39. The expanded scope for applications under proposed section 28C is divisive, undermines collective and democratic processes and invites costly litigious behaviour. It is contrary to the intentions of the RO Act, in particular to provide for the democratic functioning of organisations and respecting the role of employer and employee organisations in facilitating the operation of the workplace relations system.[9]

40. The proposed sections 28D to 28H raise a number of concerns and notably have no analogue in the Corporations Law.

41. The grounds for cancellation or alternative orders provided for under 28D to 28G range from a finding of serious criminal offence by an organization to failure to comply with an order under a designated law.

42. An order under a designated law can be for a range of matters with varying levels of seriousness, including failing to attend a bargaining meeting in accordance with a bargaining order, right of entry breaches or financial reporting breaches. The current RO Act and FW Act impose penalties for such breaches and penalties are assessed with reference to the severity of the contravention.

43. Proposed 28F provides where an organisation or a substantial number of members of the organisation or part of the organisation have failed to comply with an order or injunction under a designated law grounds for an application can be made out.

44. To expose organisations to cancellation or alternative orders for comparatively minor contraventions, or contraventions that do not have proper bearing on the operation of the organisation is excessively punitive and an unwarranted interference with members' right to freedom of association.

45. The operation of this ground also gives opportunity for the actions of a small part of an organisation, its officers or membership to have a disproportionate and unwarranted effect on the organisation or membership as a whole.

46. Section 28G provides a ground where an organization or a substantial number of members or, part of the organization or a class of members engage in industrial action other than protected action.

47. The determination of what constitutes industrial action and the scope of protected industrial action is the subject of judicial interpretation. Because of the complexities surrounding what is or is not "protected" industrial action and the uncertainty about the nature of industrial action, it is inevitable that grounds for deregistration will arise in the normal ebb and flow of industrial negotiations and bargaining.

48. Some legitimate union activities, such as campaigning for improvements to nurse/midwife to patient ratios, occur outside the scope of pursuing an enterprise agreement and could not therefore be subject to a protected action ballot.

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[9] RO Act s5(3)(d) and 5(5)

49. The ANMF takes extreme care in pursuing any industrial activity not to breach the law and to ensure that any activity taken does not impact on the health and safety of the community. Nevertheless, ANMF members have been motivated to take action against unsafe work practices that pose a risk to their own health and that of health and aged care recipients.

50. The grounds for cancellation of registration or making alternative orders set out in section 28G is of great concern to the ANMF and its membership. The paragraphs below illustrate how this proposed ground and other parts of the Bill may impact on the ANMF and its members.

IMPACT OF THE BILL ON THE WORK OF THE ANMF

51. The ANMF has long campaigned on behalf of members and with members for improved conditions for nurses, midwives and care workers. More importantly, the ANMF has campaigned for conditions to improve health outcomes and increase quality and safe care for members of the community as is required by their professional obligations.

52. In her second reading speech[10], Ged Kearney MP outlined the actions taken by the Victorian branch of the ANF (as it then was) seeking to fix the Victorian public health system that had been decimated by Jeff Kennett and his government. She described how the campaign sought to address excessive workloads due to the shortage of nurses which had resulted in a reduction in the quality of care. The campaign called on members and officers of the Victorian branch to take industrial action, some of which was unprotected. The campaign was successful and nurse-to-patient ratios were introduced in Victoria. Ratios in public hospitals are now embedded in law in Victoria. This would not have happened without the campaign of the Victorian branch of the ANF.

53. As her second reading speech points out, if this Bill goes ahead, a campaign similar to the 1999 Victorian nurse-to patient ratio campaign could attract drastic consequences for the ANMF and inhibit the ANMF's capacity to engage members in industrial action, whether protected or otherwise.

54. The ANMF, as a federal entity and through its branches has campaigned for staffing levels and skills mix in aged care. To support the campaign members undertook activities such as wearing t-shirts, using banners, speaking at protests and in rare instances, changing work patterns to highlight the campaign issues. These actions are sometimes initiated by members and conducted independently of the branch.

55. The ANMF considers this campaign to be of national significance and has undertaken the work in order to improve the health outcomes and safety of people in aged care. The introduction of proposed section 28G would however, expose the ANMF to cancellation of registration for pursuing a campaign that is widely supported by members and fully endorsed via internal governance procedures under the ANMF Federal Rules.

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[10] Ged Kearney MP, Second Reading Speech, 31 July 2019

56. In recent times, branches of the ANMF have been engaged in activities that may fall foul of the proposed Bill. The following are examples of actions taken that have led to positive outcomes for members and the community. It should be noted, that in the case of the NSW examples below, the activities were undertaken in the state system, but are nevertheless examples of the actions members take to ensure positive outcomes for members and the community.

(a) In NSW, more than 50 nurses and midwives rallied outside Blacktown Hospital to call for action following eight assaults on staff in a specialised aged care unit over a three-week period. After meeting NSWNMA branch and state officials, Western Sydney Local Health District management agreed to increase nurse numbers from two to three on each shift, allow staff to temporarily transfer to other units in order to get a break and approved the development of an education plan to give all unit staff the required skills.

(b) NSWNMA members refused on safety grounds to work as directed in the high dependency unit (HDU) of Nolan House, part of the Albury Wodonga Health campus on the border of NSW and Victoria. The safety grounds included concern that as a result of the unit having an exit by key only there were episodes when staff were trapped and unable to exit the HDU until they were safely extracted with the aid of police and/or hospital security and porters. Their stand - including closing beds and refusing to admit patients - led to an occupational health and safety review, a meeting with a NSW minister and an agreement to reconfigure the HDU to make it safer.

(c) In 2011/12, the Victorian Branch of the then ANF took both unprotected and protected industrial action in order to retain longstanding minimum nurse/midwife to patient ratios applying in the Victorian public health sector. These minimum nurse/midwife to patient ratios had delivered safer and better-quality care to the Victorian community and assisted in supporting the recruitment and retention of nurses and midwives which had reached critically low levels in the 1990s.

The taking of industrial action was endorsed at state-wide meetings of members and commenced thereafter , including in the form of unprotected rolling stoppages of work at the Royal Melbourne Hospital, Dandenong Hospital and the Western Hospital followed by rolling stoppages at Alfred Hospital, Latrobe Regional Hospital, Sunshine Hospital, Austin Hospital, Bendigo Hospital, Monash Medical Centre, Maroondah Hospital, Ballarat Hospital, St Vincent's Hospital, Frankston Hospital, Geelong Hospital and the Northern Hospital. In addition to this action, groups of members also engaged in spontaneous unprotected industrial action in some workplaces including at the Warrnambool Base Hospital in response to the threat of losing nurse/midwife to patient ratios.

Minimum nurse/midwife to patient ratios were retained with the support of the Victorian community in that round of bargaining, and are now the subject of Victorian state legislation, the Safe Patient Care (Nurse to Patient and Midwife to Patient Ratios) Act 2015.

(d) In 2018 the ANMF SA (Branch) developed and executed the 'Take the WAIT off' campaign utilising a range of media and other member and community engagement platforms to:

i. raise awareness of the chronic overcrowding at Adelaide's major metropolitan hospitals; and

ii. agitate a groundswell of community support to prompt Government action on short-term solutions to start to alleviate pressure felt by staff in emergency departments and hospital inpatient units.

The campaign included a range of media strategies, rallying on the steps of parliament and members wearing campaign stickers at work and putting up posters in public areas of hospitals. Following an extensive media and awareness raising campaign to reduce wait times in public hospitals caused by lack of beds, the Government agreed to create significant additional capacity across the health system, totalling some 135+ beds.

(e) Recently in Queensland, Carinity Wishart Gardens made a number of kitchen hands redundant and then instructed Assistants in Nursing (AINs) and Personal Carers (PC) to undertake the work of the kitchenhands.

The kitchenhands' work included taking food from a bain-marie, putting it on plates, and delivering it to residents. AINs and carers circulated a petition-style document indicating they would not take on this work, as it would interfere with their role of providing essential nursing care, such as showering residents. Our members decided to implement the collective refusal if at least 70% of AINs and PCs signed it.

Members quickly achieved that target and the QNMU notified the employer in writing of the collective refusal and that it was protected industrial activity. The employer claimed staff were taking illegal industrial action and applied to the FWC for an order against the QNMU and the AINs and PCs. After hearing evidence from the QNMU workplace representative, the FWC dismissed Carinity's claim, deciding the AINs and PCs had continued to do their work and the collective refusal was not illegal industrial action.

AINs and carers who for are already hard-pressed for time are continuing to hold their ground by refusing to take on the work of kitchen staff.

57. The example from Queensland highlights that members taking action that seeks to protect their workplace rights and the health and safety of the residents they care for can be subject to challenge at the Fair Work Commission. Of great concern, the Bill appears to provide a second avenue for pursuing orders against unions. In this case, the Fair Work Commission finding that the action was not illegal industrial action, while admissible[11], would not preclude an application under sections 28 or 28A.

58. The above are just a few examples of activities of the ANMF and its branches, members and officers that may attract the negative consequences of this Bill, whether it be disqualification of officers, cancellation of registration or alternative orders.

[11] Schedule 2 s28G(3)

59. Any such consequences, or the threat of these consequences, would significantly affect the ANMF and its members from pursuing campaigns and industrial activity that have resulted in tangible benefits to members of the community and to the working lives of nurses, midwives and care workers.

CONCLUSION

60. The Bill seeks to limit the capacity of unions to pursue just, socially progressive agendas and to improve the lives of working people.

61. Nurses, midwives and care workers face increasing pressure from low wage growth, insecure work and occupational violence and aggression. These are the issues the Government should be prioritising, not seeking to attack unions who are working to address these problems. Most important to the ANMF and its members, is the work of delivering safe and quality care to all members of the Australian community across all health sectors. The Bill represents an unwarranted and dangerous impediment to that work.

62. The ANMF urges this Senate Committee to recommend against the passing of the Bill and the Parliament vote against the introduction of the Bill.