



# AUSTRALIAN FUNERAL DIRECTORS ASSOCIATION

8 May 2017

President Justice Iain Ross AO  
Fair Work Commission  
Level 10, Terrace Tower, 80 William Street,  
East Sydney, NSW, 2011

Dear President Ross

We are writing in reference to the submissions in reply to technical and drafting matters dated 20 April 2017 filed by Australian Business Industrial (ABI) and NSW Business Chamber (NSWBC) filed in the four yearly review of the Funeral Industry Award 2010 (Award). We wish to advise that The Australian Funeral Directors Association fully supports their interpretation of the Clause 19.1 (b), 19.4 (a) and 19.4 (b) and how they interact with those provided for part-time and casual employees in Clauses 10.5 and 11.3.

Members of our Association have expressed considerable concern that the casual worker employed to do removals may have to be paid a minimum of 4 hours work to conduct a removal which typically takes 1-2 hours. Our position on the Award is that casuals, when performing removal work, are paid the minimum engagement of 2 hours and not 4 and this is the correct interpretation of the Award. These removals by casuals are mostly during the evening or early hours of the morning when the business is closed and therefore the casual cannot be employed in other work for the full four hour period. Requiring an employer to make payment for the 4 hour period, which includes penalty rates of 150% and 200%, in our opinion is double dipping and over compensates the employee and would cause full and part time employees to question the value of their work when performing removals and rates of pay compared to a casual employed for removals.

The Australian Funeral Industry Association is the only national association for funeral directors and approximately 70% of all funeral directors in Australia belong to our association. We would be more than happy to assist your department with any concerns or queries you may have in regard to the submission made by ABI and NSWBC.

Yours sincerely

Andrew White

Membership Manager

*Promoting*

*professional*

*funeral standards*

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