

18 January 2012

Manager
Philanthropy and Exemptions Unit
Personal and Retirement Income Division
The Treasury
Langton Crescent
Parkes ACT 1600

Dear Sir,

I write in response to the request for submissions in the Treasury Consultation Paper 'Review of Not-for-profit Governance Arrangements' (December 2011).

The National Electrical and Communications Association (NECA) has not at this stage prepared a full submission for several reasons.

Firstly, it is our understanding that the government does not intend the new policy or legislation to include employer bodies, such as NECA, that are governed by the industrial relations legislation (Fair Work (Registered Organisations) Act 2009).

The governance requirements placed on employer bodies by the Fair Work Act are already comprehensive and NECA's compliance is subject to a thorough annual review by Fair Work Australia. Given this existing level of monitoring by government over registered organisations such as NECA, it would be assumed that the review would not include such groups.

Secondly, NECA strongly believes, for the reasons outlined above, that Registered Organisations should not be subject to any additional regulations outside of the Fair Work (Registered Organisations) Act 2009.

Should the government intention be confirmed as different to NECA's understanding regarding which organisations should be covered by the new policy, NECA would request an opportunity to comment on several issues raised in the Consultation Paper, and would seek an extension of time beyond 20 January 2012 in order to compile a considered response.

Yours sincerely,



James Tinslay
Chief Executive Officer