

Submission to ABS

10. Are there any in your industry, business or workplace that are **not accurately described**?

For each inaccurately described occupation:

1. *Provide your proposed new title, alternative title, definition, specialisations, licensing and/or registration requirement (whichever apply). Refer here for more information on title, alternative title, definition, specialisations, licensing and/or registration requirement.*

811512 Drycleaner and/or wet cleaner

Current description

Cleans clothes, garments, upholstery and other fabrics using dry cleaning agents and machines.

New description

Cleans clothes, garments, upholstery and other fabrics using either dry cleaning or wet cleaning agents and machines or a combination of both.

2. *Provide a list of any unique tasks which distinguish this occupation from others included in ANZSCO.*

The past 10 years has seen a significant increase in the use of wet cleaning systems in the dry cleaning industry. Wet cleaning uses less water than traditional laundry. The small amount of water combined with specialised detergent, safely cleans garments that previously could only be cleaned through dry cleaning.

Most dry cleaners are now trained to use both dry cleaning and wet cleaning systems alongside each other.

We are now seeing many new entrants to the industry using wet cleaning systems only, but they still fall under the broader dry cleaning industry.

3. *Include any evidence to support your proposed changes, such as industry workforce surveys, workplace awards, job vacancy data, industry workforce planning documents, or job descriptions.*

There are around 900 drycleaning businesses in Australia of which 238 are DIA members so we can only provide feedback, statistics on our knowledge of the businesses of our members. There are no mandated rules around drycleaning businesses needing to be DIA members, it is entirely up to each individual business to join.

We can say that in the past 10 years there is roughly a 40% increase in the number of members who now a run wet cleaning service alongside their traditional dry cleaning service. Each DIA

PO Box 432 Blairgowrie VIC 3942 **Phone** 03 5908 4921

Email: info@drycleanersweb.com.au **Web:** www.drycleanersweb.com.au



member is provided with a member decal that advertises to their customers that they are part of our association. As of October, last year we have now started offering decals that identify individual DIA members as just drycleaners or wet cleaners or launderers or a combination of all three. This was introduced to our association to recognise the changing nature of our membership base and to recognise the growing wet cleaning sector.

There are 5,205 Laundry and Dry-Cleaning Services businesses in Australia as of 2023, an increase of 4.6% from 2022.

The number of businesses in the Laundry and Dry-Cleaning Services industry in Australia has grown 4.6% per year on average over the five years between 2018 - 2023.

Statistics taken from IBIS World website – Laundry and Drycleaning Trends

<https://www.ibisworld.com/au/industry/laundry-cleaning-services/672/#IndustryStatisticsAndTrends>

Industry establishments provide laundry and dry-cleaning services, as well as linen, uniform and nappy hire services. The services may be accessed through self-service facilities, such as coin-operated facilities, or through facilities operated by industry players.

4. Describe how the inaccurate description of this occupation affects your industry, business or workplace.

The current ANZSCO description of drycleaning does not affect our industry, business or workplace rather the above is just a suggestion is just to update the reality of a modern drycleaning business.

11. Are there any occupations in your industry, business, or workplace for which ANZSCO does not accurately reflect the skill level (1 to 5)? Refer here for more information on skill level. For each such occupation:

1. *Outline the skill level (1-5) that should be assigned to the occupation.*

We strongly believe that **811512 Drycleaner** should be reclassified to a Skill Level 3.

All staff who work in a drycleaning plant from a Award Level 2 role (ie. sorter of garments) up to an Award Level 5 role (drycleaner, store manager) undertake either on the job training or qualification training that includes a minimum of one to two year's experience.

While the DIA takes the view that 811512 Drycleaner should be a Skill Level 3 we also note that in terms of impact and solving our workforce challenges, the level must at least be raised to a Skill Level 4.

2. *Include any evidence to support the change, such as changed education, training or licensing requirements, occupation data, industry workforce surveys, job vacancy data, or workplace awards.*

As per the ABS's own definition of Skill Level 3:

Occupations at Skill Level 3 have a level of skill commensurate with one of the following:

- NZQF Level 4 qualification
- AQF Certificate IV or
- AQF Certificate III including at least two years of on-the-job training.

At least three years of relevant experience may substitute for the formal qualifications listed above. In some instances, relevant experience and/or on-the-job training may be required in addition to the formal qualification.

A qualified drycleaner and/or wet cleaner requires a:

- 3-year apprenticeship; and/or
- 5 years plus working in the industry.

Other jobs in our industry required the following qualifications/years' experience:

- 3 – 5 years a spotter
- 2 years a presser
- 5 years plus an invisible mender; or a tailor or tailoress.

Below are the qualifications and skillsets that employees in our industry can undertake:

Qualifications

- MST20422 – Certificate II in Laundry Operations
- MST30622 – Certificate III in Laundry Operations
- MST30922 – Certificate III in Dry Cleaning Operations

Skillsets

The following nationally recognised skill sets describe a minimum skill level for introduction to laundry and drycleaning operations, as is made clear in the skill set descriptions, e.g. “This skill set reflects the skill requirements for workers starting work in a commercial laundry or dry cleaning setting.” The skill sets listed below contain units from the MST Textiles, Clothing and Footwear Training Package and other Training Packages. The Training Package Developer for the MST Training Package has identified in the Companion Volume Implementation Guide (<https://vetnet.gov.au/Pages/TrainingDocs.aspx?q=a203ec5c-de7d-406b-b3e1-8f1a9b76e92e>) that AQF alignment is identified in the code of the units of competency:

“All unit codes begin with MST, followed by the sector code, followed by an AQF identifier (linked to the complexity of the skills and knowledge covered), followed by a unique unit code of three numbers. For example, the code MSTGN2014 is a unit coded for the ‘General’ sector, first packaged in an AQF 2 level qualification and number 014 in the sequence for similar units.”

- MSTSS00003 Introduction to Laundry Operations Skill Set
- MSTSS00004 Introduction to Laundry or Dry Cleaning Skill Set
- MSTSS00005 Control Hygiene in Laundry Operations Skill Set
- MSTSS00023 Sustainable Practices in Laundry Operations Skill Set
- MSTSS00024 Sustainable Practices in Dry Cleaning Operations Skill Set
- MSTSS00008 Use Technology in TCF Operations
- MSTSS00027 Dispose of Waste Products in TCF Operations
- MSTSS00010 Supervise Work in TCF Operations Skill Set
- MSTSS00011 Ironer Safety Skill Set

There are more skill sets for MST30919 – Certificate III in Dry Cleaning Operations available on the www.training.gov.au website.

During the COVID-19 pandemic it was internationally recognised that drycleaners and launderers were considered an essential service on the supply chain for other essential services operating for the safety, health and well-being of their respective communities.

In Australia the DIA successfully lobbied for each State and Territory to recognise drycleaning and laundry as an essential service and these businesses remained open during all lockdowns. The basis of our lobbying was the following:

- Medical Centres such as hospitals, smaller day centres and clinics are serviced daily to ensure correct standards of hygiene are applied to linen, gowns, uniforms, etc.
- Essential services such as Police, Ambulance, firefighters, require both dry-cleaning and laundry
- Food processing and supply to the public via outlets such as supermarkets, and other outlets
- Contracts in place for many allied essential services in areas such as refineries for worker's overalls and protective equipment.
- Hotels:
 - Where staff may be exposed to COVID-19 due to contact with local and overseas guests, and,
 - Hotel rooms used as an isolation area on an individual basis.
- Other governments around the world recognized the essential services provided by linen, uniform and facility services. In the United Kingdom, research conducted by the Textile Services Association (TSA) demonstrated that essential activities cannot safely function without the necessary support from the laundry and dry cleaning industry. Most states in the USA have formally recognised this process.
- To maintain the cleaning processes, suppliers and maintenance companies allied to these industries must also be considered essential services
- In stressful and uncertain times such as these, the public needs the opportunity to be able to take garments, furnishings, linen etc. to a professional company to provide personal confidence that the coronavirus has been effectively disinfected

Professional cleaning, both laundry and drycleaning, has a history of being able to disinfect viruses. There is a high level of expertise applied to the efficient processing of such work. Whether it be disinfectants combined with temperature in the laundry process, or the combination of drycleaning solvents, together with the temperatures associated with the drying and finishing processes this combination provides a very high level of assurance. It is considered home laundry is unlikely to have the same or consistent results.

It is also worth noting that in Victoria a drycleaning business now needs to be registered with the Victorian EPA for it to legally operate. A new Environmental Duty was introduced into Victoria in 2021 and due to the nature of the chemicals that drycleaners and wet cleaners use, these businesses need to be on the EPA's radar because the waste they produce is considered a Reportable Priority Waste. While Victoria is the only State that requires registration with the EPA, all other States and Territories have controls on drycleaning chemicals.

As mentioned previously in our submission the numbers provided to support our arguments are only based on the number of DIA members. In our experience over the past two years, since the last lockdown in Victoria happened, there has been a 70% increase in the number of our members asking us to help them find qualified/experienced staff. The most common roles that our members need filled are:

- Counter staff
- Pressers
- Spotters/drycleaners



If you check a job seeking website like www.seek.com.au or the DIA's Facebook Business page, you will see some of the listings for job ads.

3. *Describe how the inaccurate skill level affects your industry, business or workplace.*

There is a massive skills shortage in the drycleaning industry which was exacerbated by the closure of RMIT's Drycleaning Training Facility in Brunswick, Melbourne. We now have only one RTO for the drycleaning industry in Australia and that is a company called LCT in Newcastle, NSW.

For at least 10 years the DIA has trying to get the Skilled Occupation List so that our members can hire staff from overseas on visas that are longer than Student visas and we are regularly overlooked when it comes to skills funding for our industry.

Given the short duration of the few visas that we can access many of our members do not feel it is worth hiring someone on these visas as it takes six to 12 months to train someone who can work at Level 2 of the Drycleaning Award, which is a wet cleaner, a steam air finisher, an examiner of garments, an assembler of garments or a sorter of garments role. A fully qualified Level 5 Drycleaner takes at least three to five years depending on whether they learn on the job or via an apprenticeship.

In the last eight years the DIA has seen an increase in the number of experienced drycleaners leaving the industry, mainly due to retirement. We have influx of people coming into the drycleaning industry who have no industry experience and require significant training to get up to speed.

In 2023 alone the DIA has welcomed 10 new members into our association and none of them have drycleaning experience. Our feedback from these new members is that they saw an opportunity to buy a business that they thought was a set and forget business not realising the technical knowledge that is needed to process garments efficiently and correctly. All these members would love to have access to training but there is very little that we can offer them as LDCT is the only registered RTO in Australia for drycleaning. LDCT find it hard to access Government funding because drycleaning is a "thin market" which means that they must charge a full fee for training which is outside many business owners' financial situation.

Training is a massive problem in our industry and one example is what Victorian, South Australian and Queensland drycleaners experienced during the COVID-19 pandemic. The Federal Government offered a \$7,000 wage subsidy for apprenticeships but drycleaner in the afore mentioned states could not access the funding because of State Government rules around not allowing private, interstate RTOs to train in their state.

We desperately need to access funding for training so that we can provide more face-to-face training, especially to our members, at a cheaper price and develop some online training modules. The DIA has members from all around Australia – from Broome, WA all the way down to Hobart in Tasmania. We need to offer a low-cost training option to these businesses as their remote locations make it difficult for trainers to get to at a reasonable price.



Such is our desperation for our industry to be considered for:

- listing occupations for skilled migration visa programs
- the apprentice system
- policies and programs to address skills shortages

our CEO, Catherine Cluning, met with Zoe McKenzie who is the Liberal Federal MP for the electorate of Flinders where the DIA head office is based to put to her the dire situation our industry is in. Ms McKenzie undertook to provide a Ministerial Representation on behalf of the DIA to Andrew Giles who is the Federal Minister for Immigration, Citizenship, Migrant Services and Multicultural Affairs. The meeting between Ms Cluning and Ms McKenzie took place on 31 October at Ms McKenzie's office and the Ministerial Representation was to be presented to Mr Giles when Federal Parliament resumed on 12 November 2023.

At the time of the meeting Ms Cluning was not aware of the significant impact that 811512 Drycleaner being assigned a Skill Level 5 would have on our industry.

Our position is that it seems impossible that drycleaning can have a Skill Level 5 assigned to it by the ABS which is the same as the skill level for an 899912 Car Park Attendant or 899913 Crossing Supervisor. Our employees are dealing with sophisticated and expensive equipment and for example to open a new drycleaning business someone would have to invest between \$250,000 to \$300,000 for the latest equipment. See below for some indicative pricing:

<input type="checkbox"/> Drycleaning machine	\$80,000
<input type="checkbox"/> Wet cleaning machine	\$30,000
<input type="checkbox"/> Washer/dryer	\$30,000
<input type="checkbox"/> Gas boiler	\$45,000
<input type="checkbox"/> Air compressor	\$10,000
<input type="checkbox"/> General press/ironer	\$15,000
<input type="checkbox"/> Jacket former	\$10,000
<input type="checkbox"/> Shirt presser	\$70,000
<input type="checkbox"/> Conveyor	\$15,000

The DIA feels that our industry is in a "self-fulfilling prophecy" of minimal access to skills funded training so therefore staff just learn on the job and do not have access to affordable training for a formal qualification and then when completing census forms, they cannot accurately describe their skillset because they do not have a certificate. It then looks like employees in our industry do not need training when in reality they do.

Our industry has been just "making do" for too many years now and having to make do with a lack of training and it is not fair on our industry.

It is only by our the DIA's CEO attending a Skills Insight information session on the ANZSCO review that we realised that Drycleaning was allocated a Skill Level 5 which is clearly erroneous. We reiterate again that while the DIA takes the view that 811512 Drycleaner should be a Skill Level 3 we also note that in terms of impact and solving our workforce challenges, the level must at least be raised to a Skill Level 4. It is essential that the drycleaning industry be recognised in these three areas:



- listing occupations for skilled migration visa programs
- the apprentice system
- policies and programs to address skills shortages



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12. Are there any occupations in your industry, business or workplace which we should consider classifying under a different ANZSCO category (e.g., sub-major, minor or unit group)?

1. *Include any evidence to support the change you are proposing (such as skill transferability with minimal retraining required)*

Not applicable

2. *Describe how the current placement affects your industry, business or workplace.*

Not applicable

13. Are there any in your industry, business or workplace that should be separately identified with a unique code?

For each such occupation:

1. Describe the occupation as fully as possible, including the tasks involved; its relationship to other occupations; any registration or licensing requirements; the education and experience requirements; its skill level (1 to 5), and any other titles used to describe the occupation.

In the Drycleaning and Laundry Award 2020 there are five levels of employment within the drycleaning industry and each level contains a set of roles that can be performed. The DIA believes that the ANZSCO code for drycleaning should have at least the following sub-categories below it to help show the different roles of working in a drycleaning business:

- Spotter** - Spotters remove stubborn stains by using chemicals, brushes, sponges, and other equipment. They may do this either before or after items are dry cleaned.
- Inspector/assembler** - check the finished clothing and decide whether it needs recleaning or refinishing. If necessary, they send it to a mender for hand or machine sewing. Sort the clothing by matching it to the invoices. They put the clothing and invoices together so that the items can be returned to the proper customer.
- Finisher/Presser** - Textile and Garment Pressers press or shape articles by hand or machine. They also hang, fold, package, and tag finished articles for delivery to customers. Other tasks include:
 - Operate steam, hydraulic, or other pressing machines to remove wrinkles from garments and flatwork items, or to shape, form, or patch articles.
 - Straighten, smooth, or shape materials to prepare them for pressing.
 - Remove finished pieces from pressing machines and hang or stack them for cooling or forward them for additional processing.
 - Finish pleated garments, determining sizes of pleats from evidence of old pleats or from work orders, using machine presses or hand irons.
 - Lower irons, rams, or pressing heads of machines into position over material to be pressed.
- Counter staff** – receives soiled clothing from customers, gives them receipts, and charges customers when they pick up the cleaned clothing. They will often provide advice to a customer on how a garment needs to be cleaned to get rid of any stains or identify potential issues with may arise with a garment. A counter person will also sort garments into different categories before being processed

As per our comments in our answer to Question 11 the jobs listed above should be a Skill Level 3. Just to re-iterate it takes at least two years of on the job training to competently complete these tasks. Ideally anyone undertaking any of the above roles would complete the Certificate III in Drycleaning Operations but as discussed, we only have one RTO in Australia who does this training. If we had access to government funding, then we could move some of this training to an online platform and make it easier for employees to obtain the necessary qualifications.

2. *Indicate the number of people that undertake the occupation in your industry, business or workplace. Estimate the number of people that will be required to undertake the occupation in 5 years time in your industry, business or workplace. Where possible, use evidence to support the estimates you provide.*

There is an IBIS World report that covers the drycleaning and laundry industry, but it costs over \$1,000 to purchase.

The DIA does know that from our own research the number of drycleaning only businesses is declining but they are being replaced by more diversified “drycleaning” businesses that do drycleaning, wet cleaning and laundry work.

COVID 19 lockdowns had a major impact on our industry, and we lost a lot of businesses, but this has meant that the drycleaning businesses remaining are more sought after and their skills more specialised. There will never not be the need for drycleaning as many fabrics just cannot be cleaned by water.

The DIA has around 283 drycleaning businesses as members. The rough breakdown of staff in these businesses would be:

- 1 – 5 staff - 110
- 5 – 20 staff - 143
- 20 and up – 30 businesses

As noted previously in this submission, there are around 900 drycleaning businesses in Australia so you would need to extrapolate out the above DIA data to cover the other approx. 617 businesses. Our sample above would be a very good guide to the numbers of staff that non-DIA members employ.


3. *Identify where you think this occupation sits within ANZSCO.*

It would be a subset of Drycleaning. Drycleaning is a broad term and covers many different roles as noted above in Question 1.

A drycleaner is a trade qualified and/or someone with five plus years of on the job training. Spotters, Inspectors/assemblers, Finishers/Pressers, Counter Staff are all roles within a drycleaning business.

4. *Would adding this occupation as a specialisation of an existing ANZSCO occupation category meet the needs of your industry, business or workplace? Why? / Why not?*

If these roles could be more clearly defined with separate ANZSCO codes, then it would make it easier for employees when filling in census forms etc to accurately record their work. We would summarise that many employees are calling themselves drycleaners and noting that they have limited qualifications when in actuality they are pressers and have a Certificate III qualification and/or at least two years' experience. If they only have drycleaning as an option to select, then they will select that and put one or two years training down. This devalues the actual formal role that a drycleaner undertakes in a drycleaning business.



Catherine Cluning
Chief Executive Officer
Drycleaning Institute of Australia