

15 February 2025

Australian Bureau of Statistics (ABS)
Measuring unpaid care in the Labour Account consultation

Locked Bag 10
Belconnen ACT 2616

By email: unpaid.care.consultation@abs.gov.au

Dear Australian Bureau of Statistics,

Consultation regarding Measuring Unpaid Care in ABS Labour Accounts

The SDA welcomes the Government's announcement of 29 November 2025 that the Australian Bureau of Statistics would be funded to help develop more accurate insights on the contribution of carers.

In 2020, Australia's informal care was valued at \$77.9 billion by Deloitte Access Economics, and by the Australian Treasury at \$165.1 billion. It would be helpful to achieve a source of truth for the contribution, but it is fair to say that whatever the source of the attributed value, the contribution of unpaid carers is significant, and all agree the value has increased significantly since 2003.

Measurement of unpaid care must recognize that the issue is both gendered and industrial. Unpaid care and housework remain a significant burden disproportionately felt by women. The interaction of work and care is a social and economic clash exacerbated by low pay in workplaces and lack of recognition of the care to children and adults.

Gender: In 54% of couple families with children under 18, looking after children is always or usually done by the mother, compared to just 5% in which it is always or usually done by the father. In 78% of couple families the 'mental load' is always or usually carried by the mother.¹ Women spend 30.2 hours per week on unpaid care and housework, compared to men who spend 21.8 hours per week. This necessary but unpaid labour impacts on women's capacity to take on paid labour, with fewer women in the labour force (62.5% compared to 71.3% for men), and women working fewer hours each week.²

Industrial: The SDA funded a study into retail work: Challenges of Work Family and Care³ which identified the stress, uncertainty and issues employees face in juggling their work and care commitments. Findings show that as well as making important economic and social contributions

¹ Australian Institute of Family Studies (2024) Media release: An estimated one in four eligible mothers not taking up paid parental leave <https://aifs.gov.au/media/estimated-one-four-eligible-mothers-not-taking-paid-parental-leave>

² Australian Bureau of Statistics. (2020-21). How Australians Use Their Time. ABS. <https://www.abs.gov.au/statistics/people/people-and-communities/how-australians-use-their-time/latest-release>.

³ Cortis, N., Blaxland, M., and Charlesworth, S. (2021). Challenges of work, family and care for Australia's retail, online retail, warehousing and fast food workers. Sydney: Social Policy Research Centre, UNSW Sydney. <https://national.sda.com.au/care/>

through their paid work, SDA members make valuable contributions through the unpaid labour they provide as parents, and as carers to children and adults in their families and communities. Yet these social and economic contributions are poorly recognised and accommodated in their working lives. As an outcome of that work, SDA is seeking structured acknowledgment that work is only a part of an employee's life and that this will provide a workforce that is socially and economically productive.

Options: The consultation pack proposes a definition of care (based on the approach of Statistics Canada's Care Economy Conceptual Framework) and several options for method of measuring unpaid care – replacement costs (Individual, Minimum wage, Housekeeper wage) and opportunity cost method.

The SDA notes the diversity of unpaid care. Whichever definition and measure is used, it should acknowledge that care is often of a parent, of a family member with a disability, and of children and that the economics of these situations is different. For example, aging in formal care is far more expensive than aging at home, which is economically efficient both due to unpaid care responsibilities and health costs, but aging in care must also include unpaid care responsibilities often undertaken by working women. Care for those with a disability can be enduring and care for children varies widely in response to the age of the children as well as access to quality services, and many other factors.

The risk of a replacement cost model is the devaluation of less formal unpaid care contributions (like the project management of moving into aged care or coordination of home visits compared to direct care such as feeding and washing). The risk of the opportunity cost model is that it embeds the current inadequate measures of contribution to the economy (so a person caring for a child at home is measured on the basis of current wages in childcare as compared to their opportunity for income in a higher paid role, such as a lawyer or doctor).

In short, the process to develop measurement of unpaid care should be undertaken with the objective of showing contribution rather than building a system that drives employment being the only form of recognised social and economic participation.

Please also find attached some information about the SDA (Attachment 1) and the Principles underpinning SDA policy positions (Attachment 2).

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Gerard Dwyer'.

Gerard Dwyer
National Secretary-Treasurer

Attachment 1: About the SDA

The Shop, Distributive and Allied Employees' Association (the SDA) is one of Australia's largest trade unions with approximately 200,000 members. Our members work in retail, warehousing, fast food, hairdressing, beauty, pharmacy, online retailing, and modelling.

The majority of SDA members are women (60%), under 35 years (57%), and low-income. Retail and food services are two of the three lowest industries for median weekly earnings.

The SDA has a long history of advocating on behalf of members. We do this through enterprise bargaining; making submissions regarding Awards and the NES to provide a relevant safety net; and through numerous submissions made to parliamentary and government inquiries and other important reviews.

The SDA has 10 policy principles that guide our engagement in these reviews. For a list of these, see Attachment 2.

Attachment 2: Principles underpinning SDA policy positions

SDA policy is driven by providing value to our members whose work is regulated by an industrial system that has been reformed, but had failed them for decades.

Australians need to be supported by an economic system that has working people at its centre. Our predecessors built an industrial system which provided the foundations for shared prosperity. It is now our responsibility to utilise the reformed industrial framework for the current and future generations. Decades of concerted attacks on our industrial relations system saw inequality grow, and economic and political power has further concentrated in the hands of a few.

The world of work has changed and will keep changing. There is an unprecedented intersection between work and care. Income and gender inequality have combined to increase disadvantage. Predictable, secure hours of work that provide a living wage are at the centre of decent work. But there has been growth in insecure work, digitalisation is now a matter of course, safety concerns have persisted, and automated, digital and generative technologies must be shaped to enhance, not undermine, decent work.

We believe that fundamental not incremental change is needed. In contributing to policy, we seek to drive a new system that acknowledges the change that has occurred and will be fit for purpose in the emerging world of work.

The SDA engages in topics that help drive this agenda and we are guided by ten principles that we believe will create value for our members.

Those principles are:

1. Address Inequality & Enshrine Fairness

Minimum expectations must be set and adhered to.

2. Equity & Empowerment

All workers must be supported to progress so that no-one is left behind.

3. Mobility & Security

A socially successful economy must provide opportunity for all, regardless of their background. Systems must be built in a way that support success and adaptation in a rapidly changing world of work.

4. Delivering Prosperity & Growth For All

A foundation for prosperity and economic growth must be achieved.

5. Protection in Work & Beyond

Workplaces and the community must be healthy and safe for all workers and their families during and beyond their working lives.

6. Workers Capital & Superannuation

Workers capital and superannuation must be an industrial right for all workers and treated as deferred earnings designed for dignity and justice in retirement.

7. A Strong Independent Umpire

A strong, independent, cost effective and accessible industrial umpire and regulator must be central to the future system of work in Australia.

8. Protection & Support for Our Future

Protecting and supporting our future requires a strong and vibrant retail industry and supply chain providing decent work and jobs with fair and just remuneration and contributing to the economy including through skilled workers.

9. Work & Community

Work is a fundamental human activity that provides for personal, social and economic development. Work as it operates in community must build and protect a balance between life at work and life so that workers can contribute to society through the wider community.

10. Institutional Support for Collective Agents

Institutional support must provide for collective agents (registered organisations) in all industries so that they are recognised, enshrined and explicitly supported as central to the effective functioning of the system.

Details of specific policy positions can be discussed by contacting the SDA National Office.