

We request that our name and company details remain confidential and not be published alongside any public information on the Treasury Website.

Thank you for the opportunity to submit comments on the Review of the Register of Approved Occupational Clothing and related tax deductions. Our key people have worked closely with the current regulatory requirements over the last 20 years and therefore feel we are a relevant interested party to comment on the review.

In our experience, registration of Non-compulsory Occupational Clothing is usually prepared by uniform suppliers/manufacturers on behalf of the employer wishing to register the clothing.

Major uniform suppliers, such as us, generally manage all aspects of supplying a uniform to employees, including fabric design, style development, corporate identification (logos), employee communication, online ordering, manufacture of garments, individual distribution and garment exchange. Therefore, we play a key role in implementing the taxation requirements of providing Occupational Clothing to employees.

We are able to assist employers in their understanding of the various and complex tax rules and guidelines in relation to Occupational Clothing. The information we provide is of a general nature only; as we are not tax advisors we encourage each client to seek their own independent tax advice.

Informed uniform suppliers and manufacturers minimise the cost and time spent by businesses in meeting the requirements. We do not believe the current approach imposes a regulatory burden or significant cost on businesses, as most suppliers would manage and guide this process on the employers' behalf.

It is important we have clarity as to the tax implications of each approach to Occupational Clothing, as we would not wish to design unique uniform solutions that would be rejected as non-deductible at the final stage of approving a uniform collection.

The current guidelines, particularly in relation to Non-compulsory Occupational Clothing, provide clear guidance as to what constitutes a tax-deductible set of uniforms. As we understand the guidelines, and they are specific in nature, we have not ever had an application to register a proposed collection rejected.

We are concerned that the proposed simplification of the process may leave room for interpretation and uncertainty [*Option 2: Draft Simplified Clothing Guidelines – Appendix 1*]. This could result in having to repeat a costly and time-consuming design and approval stage.

We believe the current arrangements remain fit for purpose and urge any review to consider the importance of clear guidance as to what constitutes a tax-deductible non-compulsory Occupational Clothing range, without being open to the complexity of individual interpretation.

We would welcome the opportunity to discuss our concerns further.