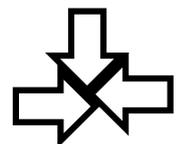


POSITION PAPER

on the Proposal for the setting up of a
National Living Wage



November 2010



MALTA EMPLOYERS' ASSOCIATION

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The Malta Employers' Association (MEA) has taken considerable care in preparing information and materials which are displayed in this handbook.

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Malta Employers' Association (MEA)
35/1, South Street, Valletta VLT 1100, Malta
Tel: 21237585, 21222992 Fax: 21230227
Email: info@maltaemployers.com
www.maltaemployers.com

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1. The Living Wage a General Background

Wage determination has been a central issue in various disciplines. Economists, politicians, theologians, and sociologists have all approached the matter from different perspectives, since it is an issue that is fundamental to the structure and functioning of a society.

Classical economic theory establishes a strict link between wages and productivity, with the wage rate being determined by interaction the value of the marginal product of labour and labour supply factors. In the 1930s, Keynesian economics abandoned this rigid approach on the premise that, from a macro-economic perspective, an economy can work its way out of a recession only if there is a stimulus to aggregate demand. Under such circumstances, wages can be higher than the value of output but only insofar as to kick start the economy over the short term.

Another school of thought links wages to the requirements for an individual to have access to a decent standard of living. The specifics of the term 'decent', or 'basic', standard of living varies among societies and also across different time periods, as yesterday's luxuries become today's necessities. The debate of 'fair wages' predates industrial revolution, but gained ground as a reaction to the emergence of capitalism and wages in a mass production environment, where workers were seen to be subject to exploitation. The papal encyclical 'Rerum Novarum' issued by Pope Leo XIII in 1891 made a specific reference to the state to provide a living wage. With the founding of the International Labour Organisation in 1919, the concepts in the encyclical sparked off international efforts

**standard of living varies
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to determine the hours in the working week, eliminate child labour and establish minimum wages worldwide.

The living wage concept has been the subject of debate in many countries, both as an idea in itself and also in comparison to other policy options to increase the disposable income of the lower income brackets. In the United States, opinions vary between the effectiveness of the living wage and the Earned Income Tax Credit, which is a wage subsidy programme that creates work incentives to low income employees. There is conclusive research that the EITC is a better policy tool than the living wage¹.

In the United Kingdom, there is similar lobbying to raise the national minimum wage to a 'living wage'. However, many of these efforts are due to regional differences in prices - the minimum wage may be adequate for a person living in Sheffield, but not in London.

At EU level, the pressure to introduce a living wage is gathering momentum from the socialist camp. This development is mainly in response to the fallout from the recession, most notably the slow job recovery, the increasing number of persons on atypical employment, and the austerity measures being resorted to by governments to correct long years of fiscal neglect. Unions are also facing poor bargaining strength, given the economic situation and mounting international competition.

1. Mark D. Turner and But S. Barnow: Living Wage and Earned Income Tax credit - A Comparative Analysis January 2003

2. Wage Determination in Malta

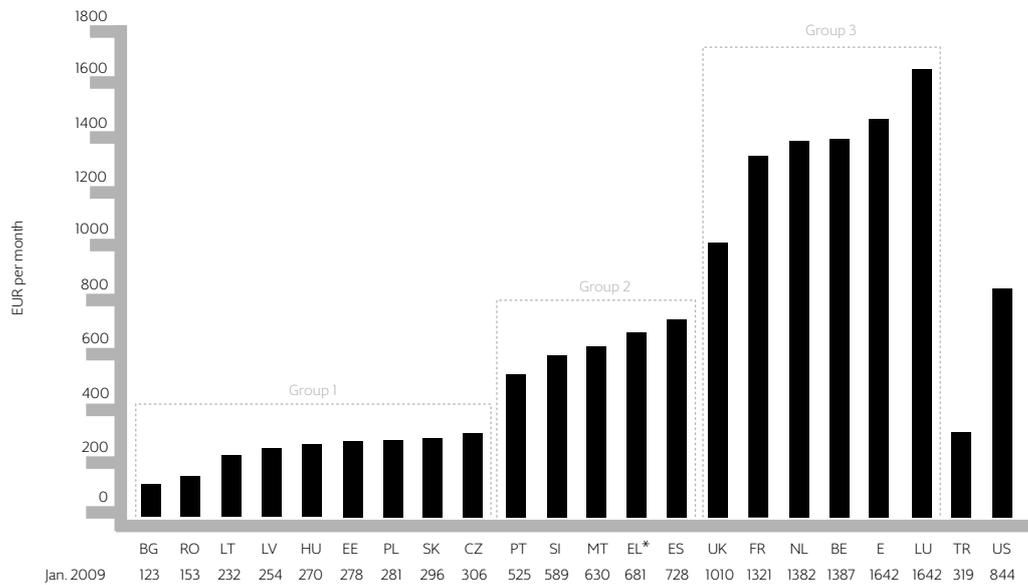
2.1 The Minimum Wage

In Malta, employees are entitled to a national minimum wage. The idea behind the minimum wage is to find a balance between ensuring a basic standard of living and maintaining competitiveness, which is essential in job creation and retention. Eurostat data (Fig 1 below) reveals that the minimum wage in Malta stands in the medium range compared to other EU countries. However, although countries such as France, Belgium and the Netherlands have a higher minimum wage, this is subject to tax, and basic items such as rent are much more expensive than they are in Malta. In fact after adjusting for differences in purchasing power, Malta ranks as the seventh country with the highest real minimum wage in the EU (see Fig 2. below), and its minimum wage is close to that in the US. It needs to be noted that there are countries, like Cyprus, who do not have a minimum wage.

**find a balance between
ensuring a basic standard
of living and maintaining
competitiveness**

Eurofound statistics also show that: 'the proportion of employees on minimum wages in 2005 was 2% or less in **Spain** (0.8%), **Malta** (1.5%), **Slovakia** (1.7%), the **United Kingdom** (1.8%) and the **Czech Republic** (2.0%) and more than 10% in **France** (16.8%), **Bulgaria** (16.0%), **Latvia** (12.0%), **Luxembourg** (11.0%) and **Lithuania** (10.3%).'

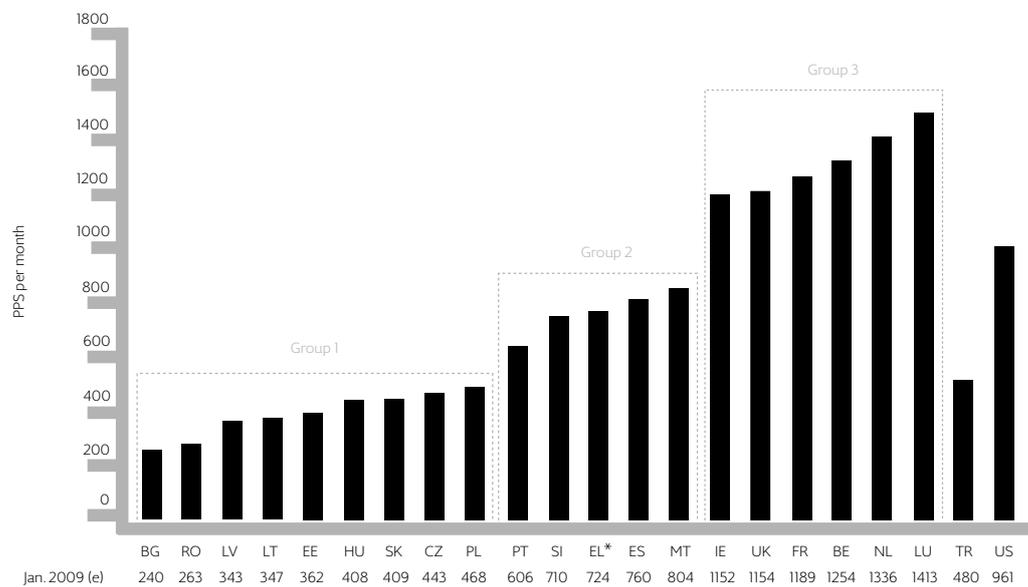
This shows that, although countries like France and Luxembourg may have a higher national minimum wage, there is a considerable ratio of employees on the minimum wage.



Group 1 is for minimum wages below 400 EUR, group 2 for 400 to 800 EUR and group 3 for more than 800 EUR. Compared to 2008 the composition of the groups has not changed.

Source: Eurostat

* July 2008



Group 1 is for minimum wages below 500 PPS, group 2 for 500 to 850 PPS and group 3 for more than 1000 PPS. Compared to 2008 the composition of the groups has not changed.

Source: Eurostat

(e): PPP 2008 applied

* July 2008

2.2 Wage Differentials and Collective Bargaining

One salient characteristic of the Maltese labour market is low wage relativities, which explains the high minimum to average wage ratio, which stands at 78%. This is mainly due to the culture of awarding flat wage increases over many years which has resulted in a narrowing of differentials. Taking the public sector collective agreement as an example, the ratio between the highest paid grade to the lowest paid grade is 4:1, which falls to less than 3:1 after deductions.

Malta has a relatively high unionised labour force, and most collective agreements are reviewed every three years. Collective bargaining occurs at enterprise level, which enables unions and employers to evaluate the financial situation of each organization separately to decide on an outcome.

2.3 WROs

Working conditions in different economic sectors are regulated by Wage Regulation Orders, which can even set a minimum for the sector that is above the national minimum wage, e.g. Hotels and Clubs WRO.

2.4 COLA

Malta is one of the few countries where all employees are entitled to an annual statutory cost of living, which is aimed at retaining purchasing parity of wages in view of inflationary pressures.

3. What is a Wage?

The MEA defines a wage as being a return to productive work, and that such return should reflect the value of the work performed. A wage can also incorporate elements that reward individual effort and experience which contribute to productivity.

In reality, there are frequent departures from this strict definition. In particular circumstances, employers may pay wages that may not fully reflect the individual's productivity, e.g. an employee on extended sick leave, or a disabled person. Wages also tend to be stable in situations of short term fluctuations in business performance.

MEA supports the principle of a minimum wage. In effect, the minimum wage implies that businesses that cannot generate sufficient value added to pay the minimum

The minimum wage should be high enough to provide for a basic standard of living

cannot operate. This is acceptable as long as there are sufficient avenues for investment and job creation which guarantee the minimum threshold on remuneration to the available labour force. The minimum wage should be high enough to provide for a basic standard of living, but low not to act as a deterrent to investment and job creation, or to incentivise the informal

economy, which would be detrimental to the very people it is meant to protect. It is the balance between these two constraints that is essential for the concept of a minimum wage to achieve both its economic and social objectives.

MEA also endorses the revision of the minimum wage to retain its purchasing power through cost of living adjustments.

There should be a clear distinction between a wage and a social benefit. Employers pay wages, not social benefits, and it appears that many arguments related to the labour market often confuse the two. Social welfare is the responsibility of governments, which determine the level of taxation to collect from businesses and individuals and to use this revenue in part to design and distribute benefits to maximize social welfare. This distributive function of social and fiscal policy cannot be assumed by employers in the private sector.

Therefore, in view of the historical and contemporary context in which the concept of the living wage has evolved, the following issues have to be considered to determine the validity of importing and transposing the idea to the circumstances of the Maltese labour market.

4. Defining the Living Wage

The living wage needs to be defined in specific terms. Clearly it cannot approximate the minimum wage as it would defeat the entire purpose of introducing it. Caritas are claiming that the weekly wage necessary to provide for a basic standard of living for a family of four is of 314 euro, whereas the current minimum wage is 152 euro.

The term living wage has also been used to describe many actions interchangeably, and this has led to confusion as to what it exactly means. Some applications of a living wage are sectoral, and therefore address specific industries or economic sectors. Others are regional in scope. The term living wage has also been used to refer to both an individual income and a family income, usually based on a family with two children. What exactly is being proposed for Malta? The term needs to be defined specifically for a focused debate on the matter.

4.1 Family Based Living Wage

A family based living wage implies that it is accessible to households with a married/co-habiting/separated couple and children. Does this mean that two people doing identical jobs will be paid differently, depending on marital status? Does the law, which guarantees equal pay for work of equal value, allow for discrimination of the sort? Any family based supplement will have to be paid not by the employer, but by taxpayers' money. This point is interlinked with the need for a stronger legislative framework which clearly defines what is meant by a 'family' and which deals with issues such as the regulation of co-habiting couples.

Another problem with a household based living wage will arise when it comes to determine the entitlement. Separated couples may declare themselves to be different households, and thus may be eligible where united families are not. It

needs to be reminded that there is already a situation in Malta where hundreds, if not thousands, of people are even prepared to renounce their parenthood to have access to welfare benefits. Will 'traditional' families be expected to be taxed to fund the living wage for welfare shoppers?

The family based living wage will work against an increase in female activity rate. It will give an incentive to women to stay at home to qualify for the living wage rather than go to work.

4.2 Individual based Living Wage

Basing the family wage on personal income also presents serious pitfalls. Firstly, if the living wage will be based on a basic wage, it may exclude the element of total income which may include overtime, commissions, performance bonuses etc. It also needs to be established whether a person who has income from other sources will also be eligible to the living wage.

If yes, the money might end up in the hands of persons who are already earning way above the living wage to begin with, and might not be addressing poverty at all. The living wage supplement will also be a waste of resources in cases where there is a second income or accumulated wealth in the household, if it is base purely on individual income.

If not, people may be incited to give up their part time employment to have access to the living wage supplement resulting in a fall in labour supply. Worse, they can declare their part time, which normally carries a lower remuneration, as their principal employment. Unlike many other countries, Malta has a tradition of part time employment in addition to full time work, and recent legislation is making the difference between the principal and the full time job less clear (same entitlement to benefits, no social security is paid on part time work - so far. However, it is up to the individual to determine which is the part time and which is the principal employment) Another option in these circumstances would be for the part time job holder to pressure the employer not to declare his/her income, resulting in both higher expenditure (i.e. the living wage supplement) and loss in revenue for the exchequer.

It needs to be established whether a person who has income from other sources will also be eligible to the living wage

4.3 Sectoral Living Wage

If the objective of introducing a living wage is to address particular sectors where earnings are lower than average, a better alternative would be to drop the idea and work with the Wage Regulation Orders. In the absence of collective bargaining at sectoral level in Malta, the WRO's have the capacity (hence their nomenclature!) to set a minimum wage that is different than the national minimum wage. Indeed, some WROs already have similar provisions. Therefore, wage determination will be left in the hands of the social partners, as is the case today. This is a more focused and practical approach.

5. How voluntary is the Living Wage?

Some literature about the Living Wage, and also the way it is being proposed locally, state that the living wage will be voluntary in nature, and that there will be incentives for those who comply.

Employers ask:

- 'How would it work exactly?' Would the state subsidise the wages for employers who pay between the minimum wage and the living wage?
- If so, will these subsidies apply also for those who already do so? If there are abusive employers, who first employ people on the minimum wage and then (possibly in agreement with the employee) opt to pay the living wage, how will these be controlled?
- Will there be guarantees that those employers who, either because they cannot, or because they do not want to, choose not to pay certain categories of employees the living wage, will not be blacklisted from tendering for government contracts?
- Will unions also agree not to conduct naming and shaming campaigns against such employers?
- What criteria will be used to determine whether a company can afford to pay the living wage or not? Does profitability automatically place pressure on an employer to pay the living wage to employees?

It should be noted that in many cases, sectors which pay low wages, in some instances the minimum wage, companies tender for contracts (particularly government contracts) on the basis of the hourly wage. Invariably, the company which offers the lowest hourly rate secures the contract. This practice has depressed wages and profits in sectors like cleaning and security, and there have been reports that companies have been awarded contracts even though they have tendered at less than the minimum legal hourly rate.

The MEA believes that abusive practices should be stopped, and has frequently brought to the attention of the political parties the need to protect the interests of legitimate employers against those who take advantage of loopholes in the system by dumping labour rates, or abusive parallel trading.

6. The Living Wage and Collective Bargaining

The living wage will affect the collective bargaining process in companies operating in a unionised environment. If the living wage is significantly higher than the minimum wage, the scope of collective bargaining, particularly in relatively low value added sectors will be diminished. Unions may be pressured to demand wage increases which would even go beyond what their members might have obtained through the living wage. Such a situation may threaten competitiveness and encourage further re-location to other lower cost countries.

7. The living Wage and Job Creation

The cost of labour and employment are definitely linked. A sudden increase in labour costs may result in fewer jobs available at lower levels and may push job seekers in such occupations to work in the informal economy, where the conditions of employment may well be lower than the current minimum.

8. Perceptions

The introduction of the living wage will also alter perceptions of poverty. Since a higher percentage of employees will be on the living wage, there will be a perception by many people that they are poorer as a result. This could fuel further demands for wage increases that are not matched by increased productivity.

9. The Living Wage and Wage relativities

The living wage will have a strong impact on wage relativities, in a country where wage differentials are already among the narrowest in the world. For the sake of argument, it shall be assumed that the living wage will first be introduced by a present of future government, as one would expect government to set an example.

Appendix 1 presents the current salary scales in the public sector, which consists of a range of 20 grades. The schedule shows that the highest official in the civil service earns a gross wage of just 4 times the lowest grade, which is the unskilled category. This differential will be reduced further following taxation and social security deductions. If anything, the schedule is evidence of the narrow wage relativities and low income inequalities that exist in Malta. Although differentials are wider in the private sector, they are still way behind what they are in many other countries. Indeed, this is one reason why Malta cannot compete in low value added jobs, but has competitive wage rates at executive, professional level. This is what has led some manufacturing companies to outsource their manufacturing operations, and to retain back up operations - marketing, R&D - in Malta.

If the living wage as proposed by Caritas (314 euro per week) is applied, it will wipe out Grades 11 to 20 in the scale. The highest official in the civil service will be receiving less than twice the lowest grade, following taxation.

If such a measure comes into effect, one would expect:

- Strong demotivation from managerial grades in the public sector
- Hardly anyone will apply for posts carrying a certain level of responsibility
- Employees will resist training to move up the scale
- There will be strong pressure to push the wages in the upper scales upwards to restore relativities. This will cause drastic wage inflation.
- There will be dramatic fallout in the private sector, as employees earning a medium income in the private sector will also push for wage increases to maintain relativities, creating industrial relations tensions as many companies will not be able, nor willing, to entertain these demands.
- Young people will not be incentivised to study, as career progression will not translate into a better income for them.
- The overall wage inflation will be detrimental to Malta's competitiveness, as the resulting wage inflation will not be matched by productivity.

It is clear that the idea of setting a living wage at €14 per week, although motivated by the best of intentions, could create economic instability. Even if the threshold is reduced, any major discrepancy between the minimum and the living wage could cause problems in the functioning of the labour market.

10. The Fiscal Impact

The introduction of the living wage will also affect government finances. Applying the concept to the public sector, plus the possibility of subsidizing the private sector for its implementation will incur considerable expense. Part of this expense may be recouped through income tax, and higher VAT revenues generated by added consumption (there will also be an impact on the current account - but that is another story), but the net effect will definitely be a gap in public finances.

Government may be constrained to increase taxation to finance the living wage. Increasing VAT rates will work against the very purpose for which the living wage would have been introduced, as it will result in an immediate decrease in purchasing power. The worst hit would be the middle and high income earners who would not have had their salaries affected, at least in the short term.

The other option would be to raise income taxes. The way to do so without affecting the recipients of the living wage would be to make income tax more progressive. This will reduce the disposable income of medium income earners, some of whom will even not benefit from the living wage, and will create pressures for employees to seek avenues of undeclared income, which will, in turn, affect public finances negatively.

11. The Social Impact

It is understandable that political and civil society forces will be sympathetic to the needs of the lower income segment of the population. MEA has been on record to predict that, as a result of uneven growth and labour mobility, wage differentials in Malta will increase, since growth areas will offer better conditions of employment than sectors which are on the decline due to international competition.

However, it has to be acknowledged that increasing income will not necessarily translate in a better welfare for some families, since the added disposable income may be spent in a manner which will not benefit family members, especially the children.

A more targeted approach may yield better results to achieve the objective of reducing the number of families facing poverty. Ultimately, the best route away from poverty lies in better family management and education to move people into better quality jobs. Measures such as means tested enhancement of student stipends, welfare supplements will ensure that added expenditure is channeled in items and activities that will offer better income opportunities to households.

12. What about the self employed?

The introduction of a living wage may also affect the self-employed, since a substantial number may be earning less than the living wage and would be eligible to it if they were employed. Will the benefits of the living wage be extended to the self employed. If not, there is a risk that many will opt to close down their business in favour of a job.

12. Conclusion

In conclusion, Maltese employers are not against increasing employees' welfare through a fair compensation that reflects the value of their efforts and productivity. In Malta, the percentage of persons earning the minimum wage is amongst the lowest in the EU, and the percentage of households living on the minimum wage is even less, given that many may have a second income or other sources of wealth. The experience of the past couple of years is proof that in most cases, companies suffered losses and yet opted to retain the labour complement, both in the hope that the recession would be temporary but also out of consideration for the social effects on many families that results from unemployment. This has been publicly acknowledged by members of parliament from both sides of the house, and even by the ecclesiastical authorities. There is no question that job retention and creation is at the heart of employers' beliefs and actions.

Maltese employers are not against increasing employees' welfare through a fair compensation that reflects the value of their efforts and productivity

The majority of employers, many of whom are small and micro enterprises, do have a social conscience and frequently manage to keep their business running through hard times at personal sacrifice. Employers who are abusive often find it difficult to have people to work for them, and the legislative framework in Malta - which includes sectoral wage regulation orders - is sufficiently strong to safeguard employees' interests, even in a non-unionised environment. A factor which is frequently overlooked is that poverty and low wages also work against employers' interests, since the performance of many businesses in Malta depends on the

strength of the purchasing power of the domestic consumer. Indeed, the living wage may work in the interests of companies that depend on domestic demand, but the price that the rest of the economy might have to pay will outweigh such benefits.

The approach to any debate about the living wage should be based on the fact that the living wage is not an objective in itself, but a policy tool. The actual objective is to reduce the number of households living in poverty or at risk of poverty. Based on the above arguments, the conclusion is that, in the local circumstances, rather than introducing the concept of a living wage, alternative policies that enable people to move out of low income or poverty would be more effective.

This could be achieved by addressing various social problems and circumstances that lead to poverty, which may not be exclusively related to income, and through facilitating mobility from low income jobs to ones which are more rewarding. There is no quick fix to moving people out of relative poverty, and the best solutions lie in longer term strategies based on heavy investment in education and the inculcation of positive values.

This is a major challenge for the social partners and civil society, and social dialogue has a key role to play in seeking the best ways in which the country can generate sufficient wealth to distribute among the most vulnerable. Employers do believe in raising people's incomes, but the facts of economic life dictate that in order to earn, a society has to produce..

Appendix 1: Schedule of salaries applicable to public officers for years 2005 to 2010

Scale	2005	2006	2007	2008	2009	2010
1	Lm 13,522	Lm 13,697	Lm 14,102	Lm 14,847	Lm 15,610	Lm 16,392
2	Lm 12,470	Lm 12,631	Lm 13,004	Lm 13,683	Lm 14,379	Lm 15,092
3	Lm 11,420	Lm 11,567	Lm 11,908	Lm 12,521	Lm 13,149	Lm 13,793
4	Lm 10,370	Lm 10,503	Lm 10,811	Lm 11,359	Lm 11,919	Lm 12,493
5	Lm 7,521 x 275 - Lm 9,171	Lm 7,638 x 275 - Lm 9,288	Lm 7,910 x 275 - Lm 9,560	Lm 8,383 x 275 - Lm 10,033	Lm 8,868 x 275 - Lm 10,518	Lm 9,363 x 275 - Lm 11,013
6	Lm 7,039 x 256 - Lm 8,575	Lm 7,148 x 256 - Lm 8,648	Lm 7,402 x 256 - Lm 8,938	Lm 7,836 x 256 - Lm 9,372	Lm 8,281 x 256 - Lm 9,817	Lm 8,736 x 256 - Lm 10,272
7	Lm 6,611 x 228 - Lm 7,979	Lm 6,713 x 228 - Lm 8,081	Lm 6,948 x 228 - Lm 8,316	Lm 7,345 x 228 - Lm 8,713	Lm 7,752 x 228 - Lm 9,120	Lm 8,167 x 228 - Lm 9,535
8	Lm 6,211 x 209 - Lm 7,465	Lm 6,306 x 209 - Lm 7,560	Lm 6,526 x 209 - Lm 7,780	Lm 6,890 x 290 - Lm 8,144	Lm 7,263 x 209 - Lm 8,517	Lm 7,644 x 209 - Lm 8,898
9	Lm 5,841 x 192 - Lm 6,993	Lm 5,930 x 192 - Lm 7,082	Lm 6,135 x 192 - Lm 7,287	Lm 6,471 x 192 - Lm 7,623	Lm 6,814 x 192 - Lm 7,966	Lm 7,165 x 192 - Lm 8,317
10	Lm 5,507 x 175 - Lm 6,557	Lm 5,590 x 175 - Lm 6,640	Lm 5,782 x 175 - Lm 6,832	Lm 6,090 x 175 - Lm 7,140	Lm 6,405 x 175 - Lm 7,455	Lm 6,726 x 175 - Lm 7,776
11	Lm 5,193 x 161 - Lm 6,159	Lm 5,271 x 161 - Lm 6,237	Lm 5,451 x 161 - Lm 6,417	Lm 5,734 x 161 - Lm 6,700	Lm 6,023 x 161 - Lm 6,989	Lm 6,318 x 161 - Lm 7,284
12	Lm 4,889 x 152 - Lm 5,801	Lm 4,967 x 152 - Lm 5,879	Lm 5,136 x 152 - Lm 6,048	Lm 5,395 x 152 - Lm 6,307	Lm 5,659 x 152 - Lm 6,571	Lm 5,928 x 152 - Lm 6,840
13	Lm 4,599 x 144 - Lm 5,463	Lm 4,677 x 144 - Lm 5,541	Lm 4,836 x 144 - Lm 5,700	Lm 5,072 x 144 - Lm 5,936	Lm 5,313 x 144 - Lm 6,177	Lm 5,559 x 144 - Lm 6,423
14	Lm 4,331 x 136 - Lm 5,147	Lm 4,409 x 136 - Lm 5,225	Lm 4,558 x 136 - Lm 5,374	Lm 4,770 x 136 - Lm 5,586	Lm 4,987 x 136 - Lm 5,803	Lm 5,208 x 136 - Lm 6,024
15	Lm 4,099 x 128 - Lm 4,867	Lm 4,177 x 128 - Lm 4,945	Lm 4,316 x 128 - Lm 5,084	Lm 4,502 x 128 - Lm 5,270	Lm 4,690 x 128 - Lm 5,458	Lm 4,882 x 128 - Lm 5,650
16	Lm 3,924 x 97 - Lm 4,603	Lm 4,002 x 97 - Lm 4,681	Lm 4,133 x 97 - Lm 4,812	Lm 4,292 x 97 - Lm 4,971	Lm 4,453 x 97 - Lm 5,132	Lm 4,617 x 97 - Lm 5,296
17	Lm 3,725 x 90 - Lm 4,335	Lm 3,803 x 90 - Lm 4,433	Lm 3,926 x 90 - Lm 4,556	Lm 4,061 x 90 - Lm 4,691	Lm 4,198 x 90 - Lm 4,828	Lm 4,337 x 90 - Lm 4,967
18	Lm 3,544 x 82 - Lm 4,118	Lm 3,622 x 82 - Lm 4,196	Lm 3,737 x 82 - Lm 4,311	Lm 3,847 x 82 - Lm 4,421	Lm 3,959 x 82 - Lm 4,533	Lm 4,072 x 82 - Lm 4,646
19	Lm 3,366 x 77 - Lm 3,905	Lm 3,444 x 77 - Lm 3,983	Lm 3,552 x 77 - Lm 4,091	Lm 3,642 x 77 - Lm 4,181	Lm 3,733 x 77 - Lm 4,272	Lm 3,825 x 77 - Lm 4,364
20	Lm 3,197 x 73 - Lm 3,708	Lm 3,275 x 73 - Lm 3,786	Lm 3,353 x 73 - Lm 3,864	Lm 3,431 x 73 - Lm 3,942	Lm 3,509 x 73 - Lm 4,020	Lm 3,587 x 73 - Lm 4,098