



QFF MEMBERS

CANEGROWERS

Cotton Australia

Growcom

Nursery & Garden
Industry Queensland

Qld Chicken Growers
Association

Qld Dairyfarmers'
Organisation

ASSOCIATE MEMBERS

Queensland Chicken
Meat Council

Flower Association of
Queensland Inc.

Pork Queensland Inc.

Queensland United
Egg Producers Ltd

Pioneer Valley Water
Co-operative Limited

Central Downs
Irrigators Limited

Burdekin River
Irrigators Area
Committee

Emerging Primary
Industries Groups

- Australian Organic
- Queensland
Aquaculture
Industries
Federation

09 June 2015

The Research Director
Finance and Administration Committee
Parliament House
George Street
Brisbane Qld 4000

Dear Director,

RE: Inquiry into Work Health and Safety and Other Legislation Amendment Bill 2015

The Queensland Farmers' Federation (QFF) appreciates the opportunity to comment on the Inquiry into Work Health and Safety and Other Legislation Amendment Bill 2015 and we have outlined a brief response to each of the outlined priorities below.

The QFF is the peak body representing and uniting sixteen of Queensland's rural industry organisations who work on behalf of primary producers across the state. QFF's mission is to secure a sustainable future for Queensland primary producers within a favourable social, economic and political environment by representing the common interests of its member organisations. The QFF's core business centres are resource security; water resources; environment and natural resources; industry development; economics; quarantine and trade.

Our goal is to secure a safe, sustainable and profitable future for our members, as a core growth sector of the economy.

Priority 1: Restoring right of entry powers

QFF and its members would be amenable to the reinstating of Right of Entry Powers for Workplace Health and Safety Officers provided that it is for matters of workplace health and safety. Previously there have been instances of union representatives using this provision to stop work in situations that were more IR related than WHS. We would recommend that only designated WHS Officers who hold the appropriate permits may be allowed entry.

Priority 2: Empowering trained health and safety representatives (HSR) to direct workers to cease unsafe work

Maintaining a safe workplace is a top priority for QFF and its members, we are therefore highly supportive of the ability of HSR's to direct stop work orders. We would indicate to the committee again however, that this power should only be used in instances that are WH&S, not IR related. Additionally we would note that some of our members which operate large enterprises may already have their own HSR's which would have the authority to issue a stop work order should they deem it necessary.

Priority 3: Amending the current incident notification requirements

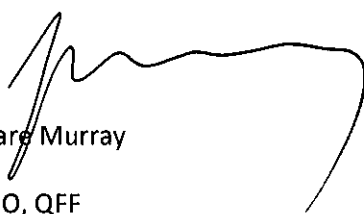
While the QFF and its members endorse the intention behind this notification requirement, we would have concern with the regulatory burden it may impose. Furthermore, with the additional paperwork required this amendment may have the unintended consequence of making employers more likely to encourage employees back to work in order to avoid filling out the additional reporting paperwork. Additionally we would note that 4 days is not a significantly long enough period and may result in the reporting of relatively minor injuries, causing further regulatory burden. We would recommend that the committee maintains the current practice with regards to incident notification.

Priority 4: Improving electrical safety by re-instating the Electrical Safety Commissioner, Electrical Safety Education Committee, Electrical Equipment Committee

The rural community has a strong record in maintaining good practices in electrical safety. The development of the *Electrical Safety Code of Practice 2010 – Electrical Equipment Rural Industry*, ensured that there was a clear set of guidelines for electrical safety within the rural industry. The QFF and its members would note that, while we support the reinstating of the Commissioner and the Committees, the Code already provides a practical basis for rural electrical safety and we would see it continue unchanged in its current form.

QFF thanks the committee again for the opportunity to comment, if you would like any further feedback please don't hesitate to contact me. Additionally we would note that this submission does not supersede and comments or positions any of our individual member organisations may have.

Sincerely,


Clare Murray
CEO, QFF