



5 May 2017

Mr Tim Lyons
Independent Reviewer
Best Practice Review of Workplace Health and Safety Queensland

BY EMAIL: whspolicy@justice.qld.gov.au

Dear Mr Lyons

Submission by the Australian Sugar Milling Council to the Independent Reviewer, Best Practice Review of Workplace Health and Safety Queensland

The Australian Sugar Milling Council provides a policy forum for Australia's sugar milling sector, representing over 95% of Australia's raw sugar milling production, and Queensland's second largest source of renewable energy generation. The Sugar Milling Sector is a significant Queensland industry generating over \$2billion of exports each year and employing 5000 people in regional locations, in many of these instances, mills are the largest employer in that centre and the only employer of traditional trades.

This sector competes globally against low cost countries and urges all levels of government to assess the business costs created by any new policies or regulations. Our members are continuously seeking ways to improve outcomes and at the same time reduce the cost of doing business in order to sustain global competitiveness.

Currently the sector is working hard to improve safety performance and has extremely good working relationships with WH&SQ. The companies are collaborating beyond site specific initiatives and jointly investing in safety initiatives at an industry level, including establishing a performance framework which has been monitoring and benchmarking progress that is demonstrating sustained improvement. In addition mill companies are creating a capability framework linked to national qualifications to drive standards in safety and operations training.

Company Safety Managers meet a minimum of four times each year and have done so for many years. The company CEOs have safety as an agenda item on quarterly council meetings. The sector has created a Safety Charter, and selects and celebrates annual Safety Awards. The sector works together to find best practice among members and from other sectors, sharing and learning together.

The ASMC believe that the appropriateness of WHSQs compliance and enforcement policy, and the effectiveness of WHSQs compliance regime, enforcement activities, and dispute resolution processes, show no sign of failing and are working well to improve safety within sugar milling.

The sugar milling sector has been working closely with WH&SQ to review data and understand risk areas to target compliance and enforcement in the areas of most effect. The milling sector holds regular forums to clarify policy gaps and risk areas, share data and develop capability to self-assess performance of sugar milling companies. This model is demonstrating continued and sustained improvement across the milling sector in both company and WH&SQ measures.



Sugar milling is an agricultural manufacturing sector competing globally with low cost producers; unnecessary increases in domestic business costs are not sustainable. ASMC would emphasise that proposed changes be evaluated for potential cost increases to business and discussed openly with industry before any changes to legislation and policy frameworks are implemented.

We are seeking more consistency in regulations and working closely with WHSQ to clarify known gaps, we are seeking assistance to clarify these points not additional regulation that will create greater confusion.

The ASMC is also seeking a rolling five year compliance program that is developed with industry and releases self-auditing tools in advance of this program. If this compliance program is developed from data and rolled out in this way it will do more for improving safety than any reactionary changes to laws or policy.

Should you have any further questions or wish to discuss the content of this submission, please contact me on 07 3231 5000 or at asmc@asmc.com.au.

Yours sincerely

Dominic V Nolan
Chief Executive Officer