



QUEENSLAND
FARMERS'
FEDERATION



Code of Practice: Managing fatigue risks at work **November 2024**

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Safe Work Australia

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This submission is provided to:

Safe Work Australia

Submitted via email psychosocialpolicy@swa.gov.au

Our members

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

About the Queensland Farmers' Federation



The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

QFF welcomes the opportunity to provide comment on the Code of Practice: Managing fatigue risks at work.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Introduction

QFF is supportive of this comprehensive Code of Practice (CoP), which outlines not only workplace safety measures but also the broader health risks associated with fatigue.

The CoP provides a thorough description of psychosocial hazards that contribute to fatigue, encompassing both workplace-related factors and external influences, including high job demands, irregular hours, interpersonal conflicts, or challenges outside of work, such as personal stressors or caregiving responsibilities.

It is vital the code be communicated to all industries in a way that acknowledges the unique environment and risks of differing sectors, in order to effectively foster a safer and healthier work environment across all industries. While a well-developed CoP is an excellent starting point to addressing fatigue related incidents in the workplace, other tools and educational material must be used alongside the Code to properly change the way Australian businesses handle fatigue management.

To address these items, QFF has drafted the below submission for the department's consideration.

Fatigue culture

Workplace culture plays a significant role in addressing fatigue, including emotional fatigue that arises from navigating co-worker dynamics and emotions. Establishing a balance where employees feel comfortable discussing fatigue with their supervisors is essential. However, this dynamic is often absent, as leadership tends to prioritise production and achieving targets in a business, viewing fatigue as a potential obstacle to these goals.

The higher demand output of workplace, the higher the pressure and stress will filter down from top to bottom of the worker chain. While these outputs and targets will always exist, across all businesses, how PCBU's and workers interact in regard to fatigue management will be a crucial aspect of fatigue related safety. It is important PCBU's develop a robust framework for managing potential reports of fatigue and how this will be dealt with along the work line. This will have a flow on impact on both leaders and workers in the workplace in relieving stress or trepidation around raising fatigue reporting, if one or multiple were to report fatigue and have to take an absence from work. QFF also wish to underline that both employers and employees will have an obligation to ensure they are aware of fatigue warning signs, fatigue reporting frameworks and participate in these notification procedures. It will take the whole of workplace, and those within it, to properly manage fatigue risk and create a safe workspace free of fatigue related incidents.

It is vital that educational packages and tools are made available alongside the CoP in order to guide PCBU's in developing robust, safe fatigue frameworks that will protect both them and their workers. Addressing this mindset is a crucial first step in fostering a workplace culture that values employee well-being alongside productivity.

Part of these frameworks should aim to shift perceptions around the importance of breaks and napping, integrating these practices into workplace routines. Similar to the approach taken in hospitals for shift workers, implementing designated spaces such as break rooms for rest could be highly beneficial. This approach is particularly relevant in physically demanding industries like mining, construction, and agriculture, where fatigue poses significant risks to safety and productivity.

The section (page 21) within the CoP on identifying fatigue should also mention interviews and casual conversation with workers. Updating the Code of Practice to explicitly address emotional and mental fatigue would acknowledge the impact of these factors and provide guidance for mitigating them. Integrating this focus into the broader context of workplace environment enhancement fosters stronger rapport across teams and hierarchies, promoting a culture of understanding and support.

Management frameworks and liability

Understanding liability in the context of fatigue-related incidents is critical. Clear guidelines are needed to determine the sufficiency of fatigue management frameworks and the responsibilities of PCBUs and workers. If fatigue is identified as a contributing factor in an incident, the adequacy of the implemented management system will play a key role in assigning accountability, so it is vital PCBU's and other leaders are aware of what exactly counts as sufficient frameworks and systems in fatigue risk management.

QFF wishes to also highlight how fatigue risk management and liability will differ considerably across varying industries, in particular agriculture. Addressing fatigue risks in family-run businesses requires tailored strategies, as interpersonal relationships and informal workplace dynamics can significantly influence fatigue management practices. These unique dynamics may impact communication, decision-making, and adherence to formal fatigue management protocols. Fatigue management also extends to PCBUs managing their own risks, which can vary significantly across industries.

In agriculture, the context is distinctly different from corporate workplaces or even remote mining operations. While mining shares some similarities, such as remote locations, it is far more regulated and typically involves larger-scale operations.

Agriculture, by contrast, operates in a unique environment characterised by irregular hours, seasonal demands, and diverse shift patterns. On farms, the PCBU is often both the owner and a primary worker, resulting in a dual burden of managing personal fatigue while balancing the demands of fatigue reporting and other business responsibilities.

This incredibly diverse range of workplace environments, as well as team structure, is something that needs to be addressed by additional materials and risk matrices which can be adapted to individual businesses and their unique structures.

An example of these tools includes the fatigue self-assessment resource available through the AgHealth Sydney. AgriFutures recently emphasised the importance of addressing fatigue in agriculture, highlighting how the unique workload and interpersonal dynamics of the industry sets it apart from others. In a collaboration with the Rural Safety and Health Alliance (RSHA), they are developing tailored risk profiles for agriculture, drawing inspiration from frameworks like those used in heavy vehicle laws. The department, as well as other industry bodies, will have a responsibility to communicate these tools to farmers as leading representatives in the field. The department may also consider adjusting the length of the Code of Practice itself, as it may hinder its accessibility and implementation. Safe Work Australia should consider creating an executive summary or concise guidelines tailored for different industries, accompanied by targeted resources. Simplifying the document without losing its essential elements will improve usability and adoption across sectors.

Summary

Fatigue management will require a multifaceted approach from PCBU's in order to change fatigue related incidents effectively. While many workplaces implement frameworks and induction programs to manage fatigue, the most significant challenge remains shifting attitudes towards fatigue. In industries where time pressures, buyer demands, and production deadlines are ever-present, fostering a culture that prioritises fatigue management is critical to achieving lasting change.

Yours sincerely



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