

22 February 2011

Ms Marie Boland
Chief Policy Officer
IR Programmes
SafeWork SA
Level 3 / 1 Richmond Road
Keswick SA 5035

Dear Ms Boland *Marie*

Re: Work Health and Safety Bill 2011

Thank you for the opportunity to meet with yourself and Ms Cannon on the 9th February 2011 to discuss the Work Health and Safety Bill 2011.

Only four areas are of concern to the South Australian Farmers' Federation (SAFF) and range from minor concern to extreme concern and disagreement.

They are:-

Clause 11 Extra Territorial Application – Minor Concern

The SAFF takes enquiries from farmers in the West Darling Pastoral region. Given that the State Legislation will mirror the National Model the current situation of having different legislation may still apply in areas such as Broken Hill which seem to be too distant to Sydney and in many respects work for closely with South Australia.

Schedule 1 – Application of Act to Dangerous Goods and High Risk Plant – High Concern

Referring to sub section 6 "in this schedule – dangerous goods means anything prescribed as dangerous goods; high risk plant means plant prescribed as a high risk plant".

This is a significant issue for the agricultural sector as farms notoriously handle hazardous chemicals and substances and operate heavy machinery.

The SAFF asks that clarity be established as to what constitutes "dangerous goods" and "high risk plant".

Schedule 2 – Local Tripartite Consultation Arrangements – Extreme Concern

The membership of the Advisory Council Division 2 membership Section 2(1(a) (2) refers to a recommendation to the Minister who was to consult with Business SA and Associations representing the interests of employers. Whilst Business SA may be considered by Government as the peak employer body in South Australia it does not represent the agricultural sector. Statistics on the SafeWork Australia website refer to the disproportionately high number of injuries and fatalities.

The SAFF as the peak representational body for the farm sector must be the representation body and voice for this Sector at the Advisory Council.

Thank you for the opportunity to comment.

Please don't hesitate to contact me to discuss further.

Yours sincerely



Carol Vincent
CHIEF EXECUTIVE