

Dear Psychosocial Policy Team,

Thank you for the opportunity to contribute to the development of the draft model Code of Practice: Managing fatigue risks at work.

The Department of Transport and Main Roads (Queensland) has a keen interest in this area, as the department's work involves significant night crew work and other work with a higher risk of fatigue.

Unfortunately we inadvertently missed the submission cut-off last night. We apologise and hope that our small contribution, on behalf of the Department is accepted for consideration. Please note our comments in the table below.

<b>SWA draft model code excerpt</b>	<b>Draft comment</b>
Overall comment	An appropriately comprehensive, useful and well-structured model Code.
<b>Section 5.4 Fatigue duties shared with workers</b>  Managing the risk of fatigue is a shared duty where both the PCBU and workers have opportunities to control the risk. (p.32)	This could be seen to mischaracterise s.46 of the WHS Act. Suggest to retitle this section as 'Duties of workers and fatigue' and change the first paragraph to: Workers have a key part to play in supporting the management of the risks of fatigue at work.
<b>Section 5.5 Other persons</b>  PCBUs must ensure, so far as is reasonably practicable, that the health and safety of other persons is not at risk from work carried out as part of the conduct of the business or undertaking. (p.34)	The word 'put' is a small but significant part of s.19(2); in terms of the legislation's intended intersection of WHS and public safety. Suggest that 'put' be reinstated in the phrase as below:  PCBUs must ensure, so far as is reasonably practicable, that the health and safety of other persons is not <b>put</b> at risk from work carried out as part of the conduct of the business or undertaking.
p.7 'healthy balanced diet', p.18 'dietary factors', p.45 'dietary factors' 'poor diet' p 46 'healthy diet'.	Noting the connotations of the word diet, particularly with regard to eating disorders, suggest instead:  p.7 'healthy, balanced eating, p.18 'nutrition factors', p.45 'nutrition factors' 'poor diet' p 46 'unhealthy eating'.

Overall comment –  
potentially in relation to  
section 3.1.

Safety culture could be a worthwhile inclusion, in terms of noting the influence of ‘workplace warrior culture, where overwork and long hours are worn as a badge of honour and rewarded. Section 3.1 could be an ideal spot to include content on organisational factors that influence fatigue-related hazards.

Thanks again for the opportunity to participate, and we acknowledge the considerable work gone into producing a comprehensive, useful and well-structured model code.

Kind regards,

WHS Systems | Work Health & Safety and Rehabilitation  
Human Resources Branch | Corporate Division  
**Department of Transport and Main Roads**