

4 June 2025

Resources Safety & Health Queensland
GPO Box 1321
Brisbane QLD 4001

Via: psychosocial@rshq.qld.gov.au (Attn: RSHQ 2025 Psychosocial Discussion Paper)

Subject: CCAA submission to the Legislative options to clarify obligations to manage psychosocial hazards in Queensland's resources industry

Dear Sir/Madam

On behalf of the Cement, Concrete and Aggregates Australia (CCAA), thank you for the opportunity to respond to the *Legislative Options to Clarify Obligations to Manage Psychosocial Hazards in Queensland's Resources Industry* discussion paper.

This submission reflects the position developed through consultation between CCAA members. Our comments aim to ensure the regulatory framework provides clarity, is practical for implementation, and supports ongoing industry improvements in managing psychosocial risks.

1. Defining Health to Include Psychological Wellbeing

CCAA supports Option 1 to explicitly define "health" in the *Coal Mining Safety and Health Act (CMSHA)*, *Mining and Quarrying Safety and Health Act (MQSHA)* as including both physical and psychological components.

This provides definitional clarity and demonstrates the industry's commitment to protecting workers from psychological harm, without creating substantial additional obligations.

2. Managing the Risk of Psychosocial Hazards

CCAA supports Option 1 to amend the regulations to explicitly require that safety and health management systems provide for the management of psychosocial risks. We also support the inclusion of definitions for:

- *Psychosocial hazard*
- *Psychosocial risk*
- Requirements for consultation with workers in developing the psychosocial risk components of SHMS/SMS.

These inclusions formalise existing practices and align with regulatory approaches already in place through WHS legislation, with many operators already implementing similar systems under other legislative frameworks.

3. Psychosocial Risk Controls

CCAA supports Option 1: *utilising existing obligations to control psychosocial risks*.

This approach enables sites to integrate psychosocial risk management into their existing SHMS/SMS frameworks without unnecessary prescription. While we acknowledge Options 2 and 3 (specifying control factors and applying a hierarchy of controls) may be useful in certain contexts, we believe these are best addressed through guidance material, not legislative prescription.

This ensures flexibility and proportionality, recognising that not all psychosocial hazards can be addressed through rigid frameworks like the traditional hierarchy of controls.

4. Reporting Obligations

- Option 1 (Preferred): We support updating guidance materials to clarify when psychosocial incidents may constitute high potential incidents or serious accidents/injuries under existing legislation.
 - Option 2 (Supportive): CCAA supports clarification of the RSHQ CEO's power to request statistical information under existing provisions, as a more flexible and proportional alternative to periodic mandatory reporting.
 - Option 3 (Not Supported): We do not support mandatory six-monthly reporting of psychosocial hazard exposures (e.g., bullying, traumatic events). We believe this risks generating inconsistent data, could deter internal reporting, and imposes undue administrative burden.
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5. Privacy in Reporting

CCAA supports removing the requirement to include names of witnesses or persons present when reporting psychosocial high potential incidents to Industry Safety and Health Representatives or District Workers' Representatives.

This change will better protect worker privacy and support a stronger reporting culture by reducing fear of identification and stigma.

6. Final Remarks

CCAA supports practical and proportionate legislative changes that clarify obligations, improve consistency with broader WHS approaches, and promote psychological safety at work. We also urge RSHQ to continue its emphasis on guidance, education and collaborative engagement with industry to support implementation.

Please do not hesitate to contact David Rynne on 0431 729 509 or david.rynn@ccaa.com.au should you wish to arrange a meeting or require additional information.

Yours Sincerely

MICHAEL KILGARIFF
Chief Executive Officer