

1 February 2023

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Email: [healthy.work@safework.nsw.gov.au](mailto:healthy.work@safework.nsw.gov.au)

Dear Ms Mann,

### **Health, Safety and Wellbeing at Work (Healthy Work Principles Paper)**

Thank you for the opportunity to comment upon SafeWork NSW's Healthy Work Principles Paper that seeks to inform the future Healthy Work Plan for NSW. We note the proposed seven principles listed within the paper that guide discussion and provide comment through out submission.

Cement Concrete & Aggregates Australia (CCAA) is the peak industry body for cement manufacturers, concrete suppliers and extractive operators throughout New South Wales. Collectively known as the heavy construction materials industry, our members are engaged in the quarrying of sand, stone and gravel, the manufacture of cement and the supply of pre-mixed concrete to meet New South Wales's building and construction needs. These businesses range from large global companies to SMEs and family operated businesses.

Cement, concrete, stone and sand are the critical materials that enables the \$56 Billion New South Wales construction industry, employing 370,000 workers and contributing 45% of the New South Wales taxation revenue base. CCAA notes that the COVID-19 pandemic has had a significant impact upon the economy of New South Wales and the construction sector, supported by an efficient heavy construction materials supply chain is playing a pivotal role to help deliver an economic rebound.

We note the efforts of Safework NSW to promote workplace health and safety across our state and the vision that has been offered with regards to the seven principles embedded within the design of the Principles Paper.

CCAA and our member companies agree with all seven principles outlined within the paper, and in particular healthy work is good for business, the creation of healthy work relies on worker participation, healthy work can positively influence lives and that a strategic, co-ordinated approach is required to achieve health work and wellbeing.

In seeking to influence the best possible design for future Healthy Work Plan for NSW, CCAA offers the following comments that we hope will be seriously considered by Safe Work NSW and legislators.

- **Inadvertent Outcomes** – we are keen to ensure that when future WHS legislation and regulations are considered, that policy matters and designs do not inadvertently encourage adverse outcomes or penalties that are disproportionate or the discouraging of more

effective behaviour and practices – e.g. policy that discourages a PCBU from monitoring and testing in the workplace.

- **Worker Safety Must Come First** – CCAA strenuously hopes that the NSW Healthy Work Plan does not become an exercise in box ticking or a document that is simply put together as a public relations exercise. It must combine safety and injury prevention with health and wellbeing to protect and ensure enhanced worker health and prevent illness.
- **Discourage inefficient and confusing actions and regulatory activities** – a point that is regularly made by our members is that in many instances, regulation or actions in the WHS space in the name of “safety” can actually have the opposite effect, leading to confusion for workers and contributing to inefficient or unsafe outcomes in the workplace. This could be an excessive number of safety signs on a site or line markings at a batching plant that confuse drivers.
- **Perception of additional legislation and red tape** – an objective of the NSW Healthy Work Plan must also be that such a document does not seek or be perceived to be positioning Safe Work NSW to consider additional legislation or requirements on PCBU’s. Careful wording that seeks to improve the work health and safety framework is central to ensuring that this perception can be addressed.

Thank you again for the opportunity to present our thoughts on SafeWork NSW’s Healthy Work Principles Paper which informs the future NSW Healthy Work Plan. Our industry is strongly committed to a safe, healthy and productive workplaces, given the critical role that we play in building the NSW economy through infrastructure.

We would appreciate the opportunity to discuss this matter with you in further detail. Accordingly, I can be contacted on 0448 848 848 or email [Jason.kuchel@cca.com](mailto:Jason.kuchel@cca.com).

Yours sincerely,



**JASON KUCHEL**  
State Director, New South Wales & South Australia