



COTTON
AUSTRALIA



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

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ABOUT COTTON AUSTRALIA

Cotton Australia is the peak body for Australia's cotton growers, representing up to 1,500 cotton farms mainly in New South Wales and Queensland but also in the Northern Territory and Western Australia. Cotton Australia works with growers and stakeholders to ensure the Australian cotton industry remains viable.

Cotton Australia supports the Australian cotton industry to be globally competitive, sustainable and valued by the community. It drives the industry's strategic direction, retains a strong focus on research and development, promotes strength of the industry, manages sustainability reporting and implements policy objectives.

1. Executive summary

Cotton Australia supports the intent of the proposed Code of Practice on Fatigue in the Workplace but urges critical revisions to ensure its practicality and fairness. The current document is overly lengthy and complex, making it difficult for small business operators to implement. Cotton Australia recommends simplifying the Code with concise, actionable content and plain language, supported by visual tools like checklists and flowcharts. Additionally, the Code should include tailored educational resources, such as fatigue management guides and online training, along with practical risk assessment tools to assist employers in managing fatigue effectively.

The Code must also address the unique challenges of industries like agriculture, particularly its seasonal nature, which involves irregular work patterns driven by weather and market conditions. Cotton Australia advocates for flexible guidelines that accommodate these variations and ensure no industry is disproportionately disadvantaged. By adopting an industry-neutral framework with adaptable provisions and sector-specific resources, the Code can promote workplace safety while supporting the viability of Australia's cotton farms and other small-scale enterprises.

2. Recommendations

1. **Simplify and Condense the Code:** Streamline the content to make the Code more concise and user-friendly, ensuring it is easily understood by small, family-owned businesses, particularly those in the cotton industry.
2. **Provide Industry-Specific Educational Resources:** Develop practical, industry-relevant resources, such as fact sheets, case studies, and training modules, to assist employers in identifying and managing fatigue risks within the context of agriculture.
3. **Introduce Risk Assessment Tools:** Include easy-to-use fatigue risk assessment tools and templates that can be adapted to the specific needs of different industries, including agriculture, with clear steps for identifying and mitigating fatigue-related hazards.
4. **Ensure Flexibility for Seasonal Industries:** Tailor the Code to account for the seasonal nature of agriculture, offering guidance on how to manage fatigue during peak seasons without placing undue burdens on employers.
5. **Create a Dynamic Code:** Make the Code adaptable and regularly updated to reflect changing industry needs and emerging fatigue management practices, ensuring it remains relevant and effective for all sectors.
6. **Provide Clear Guidance on Compliance:** Offer clear guidelines on how employers can meet the requirements of the Code, ensuring that compliance is straightforward and not a burden on smaller operations.
7. **Engage Stakeholders in the Review Process:** Involve cotton growers and other agricultural industry representatives in future consultations to ensure the



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Code addresses the unique challenges and practicalities faced by these businesses.

By implementing these recommendations, the Code can effectively protect workers while supporting the needs of small, family-owned cotton farms and other industries across Australia.

Submission response

Cotton Australia acknowledges the importance of addressing workplace fatigue to ensure the safety, wellbeing, and productivity of agricultural workers. However, the proposed Code of Practice on Fatigue in the Workplace requires significant refinement to effectively serve its purpose without imposing undue burdens on small-scale, family-run operations or disadvantaging specific industries like agriculture.

One of the primary concerns with the proposed Code is its excessive length and complexity. As it stands, the document is overly lengthy and dense, making it challenging for small business operators to understand and implement effectively. Cotton Australia recommends that the Code be streamlined to prioritise key actionable points, use plain language, and include visual aids such as flowcharts and checklists to improve accessibility and engagement.

Additionally, the current draft lacks sufficient supporting educational resources. The Code must go beyond prescriptive regulations by equipping employers with the tools and knowledge necessary to manage fatigue risks effectively. Cotton Australia suggests the development of educational resources tailored to small businesses, including guides on fatigue management, scenario-based examples relevant to agriculture, and short online training modules for both employers and employees.

The absence of practical risk assessment tools is another critical shortcoming. Effective fatigue management requires employers to assess and mitigate risks specific to their workplaces. To address this, Cotton Australia recommends incorporating user-friendly tools such as fatigue hazard identification templates, decision-support tools for scheduling, and monitoring systems that are adaptable to small, resource-limited operations.

It is also essential that the Code remains dynamic and flexible to account for the unique operational demands of industries like agriculture. Cotton growing, for example, is highly seasonal, with irregular work patterns dictated by weather and market conditions. The current rigidity of the Code risks disadvantaging industries with such unique challenges. Cotton Australia advises ensuring the Code includes provisions for seasonal fluctuations in workload and workforce availability, as well as flexible compliance measures that reflect the realities of small-scale agriculture.

Finally, it is critical that the Code maintains an industry-neutral framework to avoid disproportionately impacting any specific sector, particularly agriculture. Cotton Australia recommends adopting a broad approach supported by sector-specific guidelines, enabling businesses to tailor fatigue management practices to their needs while meeting overarching compliance requirements.

Agriculture, including cotton farming, operates in a cyclical, weather-dependent environment where periods of intense activity during planting and harvesting are offset by quieter seasons. A one-size-fits-all approach to fatigue management could disrupt operations and erode competitiveness. Seasonal workforce dynamics must also be considered, especially given the reliance on temporary workers who may be unfamiliar with fatigue management protocols.



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In conclusion, while the proposed Code of Practice on Fatigue in the Workplace demonstrates a commitment to improving safety standards, its current form risks being impractical and overly burdensome for small family-owned businesses in the cotton industry. Cotton Australia strongly recommends revising the Code to prioritise simplicity, provide educational resources and practical tools, and ensure flexibility to address the unique needs of agriculture. By adopting these changes, the Code can better achieve its intended outcomes without compromising the viability of Australia's cotton industry.

4. Conclusion

While Cotton Australia supports the principles behind the proposed Code of Practice on Fatigue in the Workplace, it is essential that the Code be refined to better suit the realities of small, family-owned cotton farms and other agricultural businesses. A more concise, accessible document with clear, actionable guidelines will empower employers to effectively manage fatigue risks without overwhelming them with complexity. Additionally, the inclusion of industry-specific resources and adaptable provisions will ensure that the Code remains relevant and equitable for all sectors, particularly those facing seasonal fluctuations like agriculture. With these revisions, the Code will better protect workers, support employers, and contribute to the long-term sustainability of the cotton industry and other Australian agricultural enterprises.