



2 September 2019

Christmas Eve Part-Day Public Holiday Consultation  
Office of Industrial Relations  
GPO Box 69  
**BRISBANE QLD 4001**

By email: [publichol@oir.qld.gov.au](mailto:publichol@oir.qld.gov.au)

Dear Sir/Madam

**Submission – Christmas Eve Part-Day Public Holiday Consultation**

Clubs Services Ipswich thanks the Queensland Government for the opportunity to provide comment on the proposal to declare a part day public holiday, from 6pm to 12am on Christmas Eve (24 December).

Club Services Ipswich does not support the Queensland Government’s proposal to declare a part day public holiday on Christmas Eve and submits that there be no change to the legislation in this regard.

If a part day public holiday was to be declared on Christmas Eve, this would add 150% of the pay rate on top of all employee hourly rates between 6pm and midnight and it would cost Club Services Ipswich up to an additional \$5000 in wages. Club Services Ipswich is already competing with rising overheads and decreasing revenues. The imposition of additional labour cost during this period would result in Club Services Ipswich having to cease their trading hours in all areas by 6pm which will cause the Club to lose a significant flow of revenue as well as have an enormous impact on staff due to their loss of hours and income. We are a non-for-profit Community Club and run under the RSL banner.

The Premier has been reported declaring this move would compensate employees for the Federal Government reducing weekend penalty rates. This may be the case for hospitality workers in restaurants, hotels and cafes, it is not the case for employees of community clubs and the club industry.

By putting forward this proposal, it is clear the Queensland Government does not appreciate the current trading environment of our industry and that of small to medium sized businesses generally. The club industry should be exempted from this proposal should it proceed.

I can be contacted on 07 3812 3366 should any clarification be required.

Yours faithfully

*Natalia Onoprichuk*  
*General Manager*