

2 September 2019

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

## **Christmas Eve Part-Day Public Holiday Consultation**

As the peak body for the caravan parks sector in Queensland we make this submission in relation to the current consultation around the proposed Christmas Eve Part-Day Public Holiday.

The Christmas holiday period is a popular time of year for Queenslanders to travel. Whether visiting friends and family or taking a trip to unwind and get away from their day to day lives, these holidays are an important chance for many full time workers to recharge and reconnect.

In Queensland many caravan parks are located in highly desirable locations, and those caravan parks near the beach or other bodies of water are popular holiday destinations for the December holidays.

In 2018 there were over 12.7 million caravanning and camping nights across Queensland with 70% of these trips occurring outside the Brisbane, Gold Coast and Sunshine Coast regions, making the sector a significant contributor to regional economies across Queensland.

The 30-54 year age bracket, or the family market, accounted for 44% of the caravanning and camping trips in Queensland in 2018 with this user group often taking time out to reconnect as a family unit away from the hustle and bustle of daily life.

Caravan parks in Queensland are largely family owned and operated businesses. The families that run these businesses often work long hours and miss out on time with their own family and friends over this Christmas period as they endeavour to ensure that all their guests have wonderful holidays.

In the past twelve months caravan parks have seen significant increases in operating costs with large increases in their insurance premiums, the introduction of the waste levy, ever increasing utility costs and a customer base that is becoming more price sensitive as the economy softens.

The introduction of an additional public holiday, even a part day public holiday, is an additional cost which these, largely micro to small, businesses cannot absorb. This will likely result in lower levels of service for guests and potentially shorter stays for visitors if they can not check in on Christmas Eve.

## **Our Recommendation**

On behalf of our members we recommend that 6pm until midnight on Christmas Eve not be made a public holiday but rather the Queensland Government recommend to the Federal Government that it legislate for voluntary employment only for all employees on Christmas Eve.



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## Background

In response to this regulatory impact statement we distributed a survey to our member caravan parks to understand the impact that this proposal would have on their business and the guests they welcome into their caravan parks for Christmas. The responses received have been used to inform this submission.

### **Do you think a part-day public holiday on Christmas Eve (24 December) from 6pm to 12 midnight in Queensland is desirable? Why/why not.**

90% of caravan park respondents advised that they did not believe that it was at all important to have a public holiday in the evening on Christmas Eve.

Caravan parks have advised us that with more and more families struggling to make ends meet it is important that affordable holiday options are still available to them.

For many years caravan parks have been this option, with a range of accommodation options available to suit just about any budget.

As a general rule caravan parks do not charge a surcharge for public holidays which means that any additional costs that are incurred by the business are either absorbed or passed on to guests across the year.

In a year when insurance premiums for most caravan parks in Queensland have doubled, the waste levy has been introduced resulting in increases in waste costs of up to 100% and utility costs have continued to rise, the introduction of an additional public holiday is cost which these small businesses cannot absorb.

As such it is highly likely these businesses will choose to close at 6pm on Christmas Eve. This would mean that many families looking to travel to their holiday destination after work on Christmas Eve would not be able to check in to the caravan park they were travelling to until Christmas Day, or possibly later depending on in the caravan park opened on Christmas Day.

For those businesses that chose to remain open it is likely they would have lower staffing levels which would result in a lower level of service over this period.

***“Having four public holidays on Easter weekend is crazy enough and we already have 3 public holidays in a week over Christmas. Adding another will just mean more closures and cutbacks in tourism/hospitality businesses.”***

### **What do you see would be the key benefits of a part-day public holiday on Christmas Eve (24 December) from 6pm to 12 midnight? For workers? For employers? For government? For the community?**

No benefits were identified by our survey respondents.

For most of these caravan parks the introduction of a part-day public holiday will result in less hours for their employees and more hours for them, the business owners, at the cost of time with their own friends and family.

Based on recent years, 60% of caravan parks indicated it was not hard to find employees to work on Christmas Eve with only 30% indicating they had previously had difficulties in finding staff to work this shift. This would indicate that there is not a need for a public holiday over this period.

***“We will have to communicate better with our customers and prep-prepare arrivals that are after 6pm. Existing staff will get less hours, so very bad for them.”***

**What costs do you see would be involved in a part-day public holiday on Christmas Eve (24 December)? For workers? For employers? For government? For the community?**

The costs identified by our member caravan parks should a part day public holiday be introduced on Christmas Eve were significant.

77% of respondents to our survey advised us that the introduction of a public holiday on Christmas Eve from 6pm to midnight would make it highly likely they would NOT operate over this period.

This response was validated at a recent meeting with caravan park operators from Southern Queensland who all indicated that the introduction of an additional public holiday would impact their ability to operate over that period.

When asked if the caravan park believed that there would be any change in their ability to find staff to work Christmas Eve if it was a public holiday the majority of respondents indicated they would either not open over this period or that there would be no change in their ability to find staff.

The introduction of a part day public holiday would likely result in less hours for staff which means in a period when many households find it hard to make ends meet these employees would have less money to pay bills and afford presents for friends and family. This reduction in income is not likely to be offset by time with friends and family as these households may spend this time concerned about how they will make ends meet with the reduction in income.

For the community there would be less economic activity with guests not able to arrive on Christmas Eve due to early closures of caravan park offices and caravan park employees having less money to spend.

***“Penalty rates continue to result in fewer hours and lower pays overall for people that often need it the most.”***

**Estimates of increased wages costs from observing a part-day public holiday on Christmas Eve are based on a 2011 survey of workers employed on Christmas Day. That day is considered to be the public holiday with the most similarity to business and community social practices on Christmas Eve. Is there another public holiday that you consider has a greater similarity to Christmas Eve and should be used for estimating increased wages cost if a part-day public holiday is observed on that day?**

In 2018, 80% of the caravan parks we surveyed stayed open beyond 6pm to allow for late guest check-ins. For those who would normally open beyond 6pm, when asked if they would stay open beyond 6pm if it was a public holiday 77% indicated they would not.

If 6pm to midnight on Christmas Eve was a public holiday 66% of caravan parks surveyed indicated they would reduce their level of staffing, with one third of these respondents advising they would miss out on time with their own family (in many cases young children) in order to run their business themselves.

The remaining businesses surveyed indicated this change would result in them shutting their business early on Christmas Eve potentially forcing guests to shorten their holiday by a night if they could not arrive at the caravan park prior to 6pm.

For those caravan parks that previously opened beyond 6pm on Christmas Eve the vast majority indicated that their staffing levels would reduce by 1-2 employees from 6pm if a part day public holiday was introduced.

Where the business is operated by the owners of the caravan park during a public holiday the wage costs are generally not calculated at a public holiday rate resulting in a misrepresentation of the actual cost to operate on Christmas Eve.

***“It will be different for different businesses, but small businesses can’t pay such high staff rates for so little return.”***

## Conclusion

Should the desired outcome of this proposal by the Queensland Government be that individuals have the choice to not work on Christmas Eve without impacting small businesses and the ability of operators of these businesses to spend time with their own friends and family, the best outcome would be lobbying the Federal Government to allow employees to “opt out” of working on Christmas Eve instead of introducing a new public holiday which will just increase costs and reduce wages for existing employees, particularly in tourism and hospitality businesses like caravan parks.

Should you wish to discuss the content of this submission, I can be contacted on 07 3862 1833 (select option 2) or 0438 305 090, alternatively I can be contacted by email at [michelle@caravanqld.com.au](mailto:michelle@caravanqld.com.au).

Kind regards



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## About Us

Caravan Parks Association of Queensland Ltd (CPAQ) is the industry body representing caravan parks in Queensland.

Established in 1966, the association is the voice for the caravan parks industry in Queensland, providing support, networking, professional development and promotional opportunities for our members.

There are currently over 420 full and associate members of CPAQ, made up of caravan park operators, mixed use parks (i.e. catering for tourists and residents in caravans, cabins and manufactured homes), and campgrounds, large and small, from all corners of the State, industry suppliers, tourism businesses, plus regional and local tourism organisations.

We seek to work with both state and local governments to balance the needs of the consumer with those of the Government and industry. Further we actively strive to ensure not only that minimum standards within parks are met, but that over time these industry standards are in fact driven higher.