

Friday, 30 August 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**

The Waves 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).

The Waves 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, it would cost The Waves an additional eight thousand dollars of additional wage costs if a public holiday penalty was to be paid for staff typically rostered during this period. The Waves is already competing with rising overheads and decreasing revenues. The imposition of additional labour cost during this period may result in The Waves operating a reduced roster or choosing to close at 6:00pm on Christmas Eve.

In response to the Queensland Government's position that declaring a part-day public holiday will give employees the right to refuse to work if the request to work is unreasonable or the refusal to work is reasonable, The Waves may include only rostering those who want to work or rostering those staff who are critical to the operation of the business. In light of this, declaring a part-day public holiday will not change the status quo of The Waves in terms of rostering employees during this period.

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.

I can be contacted on 07 4152 1531 should any clarification be required.

Yours faithfully,

A handwritten signature in blue ink, appearing to be "BR", with a long horizontal line extending to the right.

Brendan Royall  
CHIEF EXECUTIVE OFFICER

*real fun every day*

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