

29/08/2019

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**

Kurrawa Surf Club 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).

Kurrawa Surf Club 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 Kurrawa Surf Club an additional \$4000. The Kurrawa Surf Club is already competing with rising overheads and decreasing revenues. The imposition of additional labour cost during this period would result in Kurrawa Surf Club choosing to close at 5:00pm 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 Kurrawa Surf Club will close for business at 5:00pm and will not roster any staff for this public holiday 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 0420972878 should any clarification be required.

Your faithfully

Geoff Toussaint-Hayes  
General Manager  
Kurrawa Surf Club