

Ai GROUP SUBMISSION

Investigation into Proposed
Christmas Eve Part-Day
Public Holiday 2019

**Submission to the
Queensland Government
Office of Industrial Relations**

2 September 2019

About Australian Industry Group

The Australian Industry Group (Ai Group) is a peak industry association in Australia which along with its affiliates represents the interests of more than 60,000 businesses in an expanding range of sectors including: manufacturing, engineering, construction, automotive, food, transport, information technology, telecommunications, call centres, labour hire, printing, defence, mining equipment and supplies, airlines, health, community services and other industries. The businesses which we represent employ more than one million people. Ai Group members operate small, medium and large businesses across a range of industries. Ai Group is closely affiliated with many other employer groups and directly manages a number of those organisations.

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Introduction

The Australian Industry Group (**Ai Group**) makes this submission in response to the Queensland Government's investigation into a proposed Christmas Eve part-day public holiday in Queensland.

As part of its investigation, the Queensland Government has released a [Consultation Regulatory Impact Statement](#) canvassing three options regarding a part-day public holiday on Christmas Eve. The third option of developing legislation to make Christmas Eve a part-day public holiday from 6pm to midnight under the *Holidays Act 1983 (Qld)*, is identified as the Government's preferred option.

Ai Group urges the Queensland Government to abandon plans for a Christmas Eve public holiday. No persuasive case exists for the Queensland Government to depart from the status quo – identified as option 1 in its Consultation Regulatory Impact Statement (**RIS**).

The proposed additional public holiday would impose unwarranted additional costs on businesses in numerous industries that need to operate on Christmas Eve. Many businesses in the manufacturing, health, transport, aviation, emergency services, energy, IT, maintenance services, telecommunications, accommodation services and numerous other industries need to operate on a 24 hour / 7 day a week basis due to the nature of their operations. The proposed public holiday will make these businesses less competitive with interstate and overseas firms.

The idea has reportedly been proposed by the SDA, the union which represents retail workers, at a time when the retail industry is generally struggling, with some retailers suggesting it is in recession. The proposal would further penalise retailers at their busiest period of the year.

The Government's reported argument that cafes will be able recoup the cost by charging a public holiday surcharge, fails to recognise that most of the businesses that will be impacted are not cafes and most impacted businesses will be unable to recoup the cost through a surcharge. Also, many cafes and restaurants are struggling to survive and the imposition of unnecessary additional costs is not in anyone's interests.

The proposed amendment to the *Holidays Act 1983 (Qld)* for an additional part-day public holiday adds to the disjointed and uncoordinated way in which State Governments are adding to public holidays and it undermines the sense that we have a national economy. The inconsistency in public holidays between States is already a major problem. This proposal will make the problem worse.

It is also concerning that the Queensland Government is contemplating the introduction of the public holiday for Christmas Eve in 2019. This provides business with little opportunity to budget for the additional costs that will result.

Since the Queensland Government made its announcement, many businesses have contacted Ai Group expressing very strong opposition to the public holiday given the adverse effects of their operations.

The idea is without merit and should be abandoned.

Cost of public holidays

The cost of each public holiday is very significant and should not be underestimated.

Many employers operate on a 24/7 or 7-day a week basis due to trading, supply chain and/or regulatory requirements. Industries such as manufacturing, health, transport, aviation, emergency services, energy, IT, maintenance services, telecommunications, accommodation services, retail, fast food, hospitality and tourism are particularly affected by both the annual quantum of public holidays and the conditions which are attached to them.

For many employers, ceasing operations on a public holiday is simply not possible or workable. These employers pay their employees a premium to work on public holidays at substantial cost. In the majority of industries, these costs cannot readily be 'surcharged' to consumers to minimise the cost to the business. For employers who close their operations on public holidays, there is a significant cost due to lost revenue and productivity. This is not confined to lost revenue for the period during which trading or operations cease during the public holiday period, but the consequent 'make-up' activities that impact at a later stage on productivity and costs.

The casual employees of businesses which close their operations will lose wages at a time when such income is likely to be highly valued over the Christmas / New Year holiday season.

The draft RIS for the proposed holiday states:

Should Christmas Eve be declared a public holiday from 6pm to 12 midnight, workers in these sectors would have the right to refuse to work or to be compensated at public holiday rates if they do work. If this occurred, a preliminary estimate of additional wage costs to Queensland industry per annum, including the public sector is in the range of a lower end estimate of \$41.3 million to an upper end estimate of \$136.9 million. The preliminary estimate for the public sector per annum is in the range of \$9.4 million to \$21.1 million.

In Ai Group's view, the above analysis understates the likely cost of the proposal.

The RIS assumes that the proportion of employees working on Christmas Eve would be similar to those who worked on Christmas Day in 2011. Appendix A shows employees from a large range of industries worked on public holidays in 2011, including on Christmas Day, Boxing Day and an additional Christmas Day public holiday.

Based on the industries in which employees worked on the Christmas Day and/or Boxing Day public holidays in Queensland in 2011, we estimate that a total of 63,170 non-farm businesses in Queensland could be affected by a part-day public holiday, including 62,869 small and medium sized businesses (with 1 to 199 employees). This amounts to 37% of the 167,652 employing businesses that were active in Queensland in 2018. A further 9,100 agricultural businesses may also be affected, since almost all farm businesses must attend to their crops and/or livestock every day including public holidays. If these farming businesses are included, then 42% of employing businesses in Queensland are potentially affected by the costs associated with public holidays (see **Table 1** below).

These businesses would need to:

- Pay employees more to work during the part-day public holiday hours;
- Increase the work hours of business owners to cover the part-day public holiday; or
- Close the business during the part-day public holiday when they would otherwise have stayed open, resulting in a significant loss of sales revenue. In retail trade and some other sectors, Christmas Eve is among their busiest trading days of the year, so such a closure would result in a much larger loss of revenue than on almost any other working day. For many small businesses, closing would therefore be a last resort, or would not be considered as a viable option at all.

Appendix A of the RIS indicates that the number of people working on Boxing Day and the 'Christmas day additional public holiday' was significantly higher in 2011 than the number working on Christmas Day. The RIS adjusts these 2011 employment numbers to reflect employment growth until 2018, producing an estimate of 360,121 who worked on Boxing Day in 2018 (assuming the same work patterns as in 2011) and 108,596 who worked on Christmas Day. A similar methodology indicates that 337,302 would have worked on a Christmas Day additional public holiday if it were held in 2018.

With approximately 2.5 million people employed in Queensland as of June 2018, this suggests 14% of the State's total workforce was working on Boxing Day in 2018, 13.5% would have worked on a Christmas Day additional holiday (if it were held), and 4.3% was working on Christmas Day in 2018. Christmas Eve is one of the busiest trading days of the year for many retailers, hospitality businesses and their suppliers. The number of people working on Christmas Eve are therefore likely to be closer to Boxing Day and/or a Christmas Day additional holiday (if it is held) than they are to Christmas Day. With more than triple the number of people working on Boxing Day compared to Christmas Day in Queensland in 2011, this suggests the true cost could be more than triple the estimate presented in the draft RIS. This implies a total cost range in the order of \$123.9 million to \$410.7 million in employment costs alone, not including the cost to businesses that choose to close instead.

The huge cost of public holidays on businesses was highlighted by Ai Group research in 2015 that reported that the additional "AFL" public holiday in Victoria had the following effect on business:

- 85% of businesses closed on the public holiday;
- 71% of businesses incurred additional labour costs (including penalty rates paid on the day but also additional paid hours on other days to make up for lost production), averaging \$14,250 per business; and
- 85% of businesses incurred a loss of revenue. The average loss was \$57,500 per business and ranged from \$1,000 to well over \$500,000 per business.

The regulatory impact modelling by Price Waterhouse Coopers (PwC) (commissioned by the Victorian Government), estimated the total loss of economic activity due to the public holiday at between \$680 million and \$852 million per year. PwC had also estimated that Victorian employers would pay additional wages of between \$117 million and \$147 million in penalty rates, if they chose to open for business on the ‘AFL’ public holiday.

The very large increase in labour costs that would apply to businesses that must remain open, or choose to remain open, on the proposed Queensland Christmas Eve public holiday are highlighted by the following examples:

| Award | Rate that currently applies between 6pm and midnight on Christmas Eve | Rate that would apply on the proposed public holiday |
|---|--|---|
| <i>Manufacturing and Associated Industries and Occupations Award 2010</i> | 15% afternoon shift loading | 250% penalty |
| <i>General Retail Award 2010</i> | 6pm to midnight: 25% penalty | 225% penalty |
| <i>Fast Food Industry Award 2010</i> | 6pm to 10pm: Ordinary rate 10pm to midnight: 10% loading | 225% penalty |
| <i>Hospitality Industry (General) Award 2010</i> | 6pm to 7pm: Ordinary rate 7pm to midnight: 10% loading | 225% penalty |

The South Australian and Northern Territory Christmas Eve public holidays apply from 7pm until midnight, but the proposed Queensland Christmas Eve public holiday would apply from 6pm until midnight, thereby imposing even higher costs on Queensland employers and creating even more inconsistency with public holidays in other States.

The costs associated with national inconsistency regarding public holidays

A large number of employers that operate in Queensland also operate in other States and Territories. These employers must administer different public holidays in each State or Territory in which they operate. This point is made clear by Table 2 in the RIS which displays the various public holidays observed by each State and Territory.

The inconsistency creates a heavy administrative and cost burden on employers that operate in more than one State or Territory. These costs need to be considered by the Queensland Government, in addition to the direct costs associated with business decisions to operate or not operate on the proposed public holiday.

In 2015 the Productivity Commission conducted an extensive inquiry into Australia’s Workplace Relations Framework. In December 2015, the Productivity Commission released its final report which contains the following important finding: (emphasis added)

“State and territory governments can choose to designate public holidays that have some particular cultural significance for their jurisdictions. However, in doing so, they should take into account the total number of public holidays in the jurisdiction relative to the national benchmark of eight national public holidays, and the impacts, which vary depending on whether the public holiday is on a weekend or weekday. Declaring additional days as public holidays may be politically appealing, but comes at significant economic costs. A public holiday declared on a weekday will often lead to closure of an enterprise on that day, with losses in output, reduced convenience for customers, and reduced capital utilisation. If the enterprise decides to operate on a weekday public holiday, the cost per employee will generally rise by 150 per cent above the standard weekday rate.”¹

In its final report, the Productivity Commission made the following recommendation (16.2):

The Australian Government should amend the National Employment Standards so that newly designated state and territory public holidays are not subject to public holiday penalty rates or a paid day of leave.

The Queensland Government’s proposed Christmas Eve public holiday is wholly inconsistent with the approach recommended by the Productivity Commission.

In addition to the many problems and additional costs that inconsistency imposes on all businesses which operate in more than one State, there are special problems for businesses that operate in towns close to the border with New South Wales. It is unfair for businesses in Coolangatta to have much higher costs imposed on them on Christmas Eve, than businesses which operate in Tweed Heads.

Ai Group has previously called for the Council of Australian Governments (COAG), to develop a nationally consistent approach to public holidays in respect of:

- The quantum of public holidays;
- The days on which public holidays which are recognised in each State and Territory are held; and
- The substitution of certain public holidays which fall on weekends rather than declaring additional days.

Ai Group urges the Queensland Government to support a nationally consistent approach to public holidays, rather than proceeding with the proposed Christmas Eve public holiday which would lead to even more inconsistency.

¹ Productivity Commission 2015, *Workplace Relations Framework*, Final Report, Canberra, p.536.

The interaction between Qld public holidays and federal workplace laws

The *Fair Work Act 2009 (Cth)* (**FW Act**) applies to the majority of employers and employees in Queensland. The FW Act, through the National Employment Standards (NES) recognises 8 specific public holidays:

- 1 January (New Year's Day)
- 26 January (Australia Day)
- Good Friday
- Easter Monday
- 25 April (Anzac Day)
- The Queen's Birthday holiday
- 25 December (Christmas Day)
- 26 December (Boxing Day)

In addition to the 8 public holidays above, the FW Act, recognises public holidays declared or prescribed by or under a law of a State or Territory (s.115(1)(b)). The FW Act also recognises as public holidays, those days that are substituted for public holidays under a law of a State or Territory.

The effect of this is that any Queensland law, such as the *Holidays Act 1983*, under which public holidays are declared, will require employers to recognise those public holidays for Queensland employees. The conditions applying to public holidays recognised under the FW Act include entitling an employee to be absent from work (s.114(1)) and ensuring that any request by an employer for an employee to work a public holiday is reasonable (s.114(2)).

An employee may refuse an employer's request to work on a public holiday if the employee's refusal is reasonable. In determining what is a reasonable, s.114(4) of the FW Act provides a set of factors that must be taken into account:

- (a) the nature of the employer's workplace or enterprise (including its operational requirements), and the nature of the work performed by the employee;
- (b) the employee's personal circumstances, including family responsibilities;
- (c) whether the employee could reasonably expect that the employer might request work on the public holiday;

- (d) whether the employee is entitled to receive overtime payments, penalty rates or other compensation for, or a level of remuneration that reflects an expectation of, work on the public holiday;
- (e) the type of employment of the employee (for example, whether full-time, part-time, casual or shiftwork);
- (f) the amount of notice in advance of the public holiday given by the employer when making the request;
- (g) in relation to the refusal of a request--the amount of notice in advance of the public holiday given by the employee when refusing the request;
- (h) any other relevant matter.

In addition to the above entitlements in the FW Act, most modern awards and enterprise agreements require employers to pay penalties to employees who work on a public holiday. Typically, such penalty payments are set at 225%-250% of the employee's minimum rate of pay.

The RIS cites that "a major reason"² for considering a part-day public holiday on Christmas Eve relates to the desire by workers to attend traditions and observances and spend time with family and friends. This Statement suggests that employees do not otherwise have an entitlement to refuse work for any day other than a public holiday. This assessment is not accurate.

Employees requested by their employer to work overtime during the period 6pm-12pm on Christmas Eve (such as in circumstances identified in Case Study 1 of the RIS) are currently already afforded the protections of s.62(3) of the FW Act which regulates the circumstances in which employees can be requested to work additional hours. Specifically, s.62(1) prohibits an employer from requiring an employee to work more than their weekly ordinary hours (38 hours per week for full-time employees and less of part-time employees) unless the additional hours are reasonable. Employees are entitled to refuse to work unreasonable additional hours. The factors identified in s.62(3) must be taken into account in determining whether any additional hours requested are reasonable or unreasonable. Many of the factors in s.62(3) are the same as, or similar to, the factors in s.114(4) which apply to public holidays.

Accordingly, this "major reason" for introducing a new public holiday does not stand up to scrutiny.

Conclusion

A case has not been established for introducing a new part-day public holiday on Christmas Eve. The additional part-day public holiday:

- Is strongly opposed by Queensland businesses;

² *Consultation Regulatory Impact Statement- Investigation of part-day public holiday on Christmas Eve, 2019, p.17.*

- Would impose additional costs on industry that will not be able to be recovered;
- Would reduce the competitiveness of Queensland businesses;
- Would increase the inconsistencies between public holidays in different States and Territories;
- Would add to the complexity and cost of administering public holidays for many businesses.
- Would not universally provide employees with the 'right to refuse work';
- Would penalise thousands of casual employees who will lose work on Christmas Eve because many employers will close their operations.

The proposal is without merit and should be abandoned.

Table 1: Total businesses in Queensland, by industry and size (number of businesses at June 2018) and industries potentially affected by a partial public holiday on Christmas eve

| Number of businesses, June 2018 | Non-employing | Small (1-19 employees) | Medium (20-199 employees) | Large (200+ employees) | Total employing | Total |
|---|---------------|------------------------|---------------------------|------------------------|-----------------|--------------|
| Agriculture | 27432 | 7503 | 587 | 19 | 8109 | 35535 |
| Aquaculture | 122 | 72 | 8 | 0 | 80 | 203 |
| Forestry and Logging | 677 | 163 | 6 | 0 | 169 | 848 |
| Fishing, Hunting and Trapping | 1034 | 364 | 6 | 0 | 370 | 1396 |
| Agriculture Support Services | 2076 | 1021 | 57 | 3 | 1081 | 3152 |
| Agriculture | 31341 | 9123 | 664 | 22 | 9809 | 41134 |
| Coal Mining | 56 | 68 | 11 | 18 | 97 | 149 |
| Oil and Gas Extraction | 39 | 27 | 5 | 3 | 35 | 74 |
| Metal Ore Mining | 136 | 36 | 11 | 9 | 56 | 195 |
| Non-Metallic Mineral Mining Exploration and Other Mining Support Services | 266 | 177 | 20 | 0 | 197 | 462 |
| Mining | 1052 | 667 | 91 | 33 | 791 | 1847 |
| Food Product Manufacturing | 626 | 1055 | 217 | 22 | 1294 | 1938 |
| Beverage and Tobacco Product Manufacturing | 138 | 100 | 14 | 0 | 114 | 248 |
| Textile, Leather, Clothing and Footwear Manufacturing | 613 | 515 | 39 | 0 | 554 | 1159 |
| Wood Product Manufacturing | 529 | 561 | 93 | 3 | 657 | 1175 |
| Pulp, Paper and Converted Paper Product Manufacturing | 34 | 25 | 6 | 0 | 31 | 77 |
| Printing & Recorded Media) | 449 | 503 | 42 | 0 | 545 | 995 |
| Petroleum and Coal Product Manufacturing | 30 | 26 | 0 | 6 | 32 | 59 |
| Basic Chemical and Chemical Product Manufacturing | 289 | 226 | 37 | 9 | 272 | 553 |
| Polymer Product and Rubber Product Manufacturing | 247 | 294 | 53 | 3 | 350 | 600 |
| Non-Metallic Mineral Product Manufacturing | 273 | 293 | 34 | 3 | 330 | 607 |
| Primary Metal and Metal Product Manufacturing | 152 | 176 | 37 | 12 | 225 | 380 |
| Fabricated Metal Product Manufacturing | 1456 | 1524 | 164 | 14 | 1702 | 3138 |
| Transport Equipment Manufacturing | 880 | 738 | 82 | 0 | 820 | 1701 |
| Machinery and Equipment Manufacturing | 1001 | 1068 | 122 | 9 | 1199 | 2172 |
| Furniture and Other Manufacturing | 839 | 731 | 35 | 0 | 766 | 1604 |
| Manufacturing | 7556 | 7835 | 975 | 81 | 8891 | 16406 |
| Electricity Supply | 139 | 56 | 9 | 9 | 74 | 208 |
| Gas Supply | 28 | 17 | 3 | 0 | 20 | 48 |
| Water Supply, Sewerage and Drainage Services | 101 | 62 | 11 | 5 | 78 | 182 |
| Waste Collection, Treatment and Disposal Services | 418 | 402 | 25 | 0 | 427 | 857 |
| Utilities | 686 | 537 | 48 | 14 | 599 | 1295 |
| Building Construction | 10376 | 5974 | 180 | 6 | 6160 | 16539 |

| | | | | | | |
|---|--------------|--------------|-------------|-----------|--------------|--------------|
| Heavy and Civil Engineering | | | | | | |
| Construction | 1173 | 1033 | 100 | 9 | 1142 | 2318 |
| Construction Services | 33005 | 23578 | 668 | 21 | 24267 | 57261 |
| Construction | 44554 | 30585 | 948 | 36 | 31569 | 76118 |
| Basic Material Wholesaling | 1358 | 1425 | 147 | 10 | 1582 | 2941 |
| Machinery and Equipment Wholesaling | 1308 | 1394 | 126 | 9 | 1529 | 2822 |
| Motor Vehicle and Motor Vehicle Parts Wholesaling | 553 | 560 | 50 | 0 | 610 | 1161 |
| Grocery, Liquor and Tobacco Product Wholesaling | 816 | 825 | 151 | 6 | 982 | 1805 |
| Other Goods Wholesaling | 1608 | 1342 | 94 | 3 | 1439 | 3014 |
| Commission-Based Wholesaling | 1055 | 645 | 14 | 0 | 659 | 1721 |
| Wholesale | 6698 | 6191 | 582 | 28 | 6801 | 13464 |
| Motor Vehicle and Motor Vehicle Parts Retailing | 983 | 1147 | 170 | 10 | 1327 | 2295 |
| Fuel Retailing | 216 | 455 | 62 | 0 | 517 | 723 |
| Food Retailing | 1388 | 2518 | 280 | 9 | 2807 | 4203 |
| Other Store-Based Retailing | 5868 | 7958 | 466 | 12 | 8436 | 14331 |
| Non-Store Retailing and Retail Commission Based Buying and/or Selling | 2347 | 1085 | 27 | 0 | 1112 | 3461 |
| Retail | 10802 | 13163 | 1005 | 31 | 14199 | 25013 |
| Accommodation | 1394 | 1418 | 167 | 22 | 1607 | 2991 |
| Food and Beverage Services | 3606 | 9890 | 1289 | 51 | 11230 | 14822 |
| Hospitality | 5000 | 11308 | 1456 | 73 | 12837 | 17813 |
| Road Transport | 11764 | 4863 | 288 | 14 | 5165 | 16925 |
| Rail Transport | 3 | 3 | 0 | 0 | 3 | 8 |
| Water Transport | 90 | 50 | 8 | 3 | 61 | 152 |
| Air and Space Transport | 232 | 99 | 12 | 3 | 114 | 336 |
| Other Transport | 432 | 239 | 28 | 3 | 270 | 706 |
| Postal and Courier Pick-up and Delivery Services | 2214 | 1500 | 35 | 0 | 1535 | 3752 |
| Transport Support Services | 8996 | 525 | 48 | 10 | 583 | 9581 |
| Warehousing and Storage Services | 176 | 129 | 15 | 0 | 144 | 323 |
| Transport | 23907 | 7408 | 434 | 33 | 7875 | 31783 |
| Publishing (except Internet and Music Publishing) | 390 | 214 | 9 | 0 | 223 | 615 |
| Motion Picture and Sound Recording Activities | 756 | 367 | 27 | 3 | 397 | 1152 |
| Broadcasting (except Internet) | 20 | 15 | 10 | 6 | 31 | 43 |
| Internet Publishing and Broadcasting | 199 | 74 | 0 | 0 | 74 | 277 |
| Telecommunications Services | 243 | 188 | 9 | 0 | 197 | 429 |
| Internet Service Providers, Web Search Portals and Data Processing Services | 512 | 268 | 7 | 3 | 278 | 787 |
| Library and Other Information Services | 19 | 12 | 0 | 0 | 12 | 43 |
| Media & Telco | 2139 | 1138 | 62 | 12 | 1212 | 3346 |
| Finance | 5717 | 1441 | 66 | 13 | 1520 | 7234 |
| Insurance and Superannuation Funds | 19936 | 628 | 6 | 3 | 637 | 20573 |

| | | | | | | |
|--|--------------|---------------|--------------|------------|---------------|---------------|
| Auxiliary Finance and Insurance Services | 5833 | 3928 | 78 | 6 | 4012 | 9847 |
| Finance & Insurance | 31486 | 5997 | 150 | 22 | 6169 | 37654 |
| Rental and Hiring Services (except Real Estate) | 5014 | 1664 | 128 | 6 | 1798 | 6820 |
| Property Operators and Real Estate Services | 37688 | 6417 | 267 | 7 | 6691 | 44389 |
| Property services | 42702 | 8081 | 395 | 13 | 8489 | 51209 |
| Professional, Scientific and Technical Services (Except Computer System Design and Related Services) | 23628 | 17349 | 731 | 29 | 18109 | 41739 |
| Computer System Design and Related Services | 4672 | 3282 | 111 | 5 | 3398 | 8075 |
| Professional services | 28300 | 20631 | 842 | 34 | 21507 | 49814 |
| Administrative Services | 4167 | 3925 | 564 | 53 | 4542 | 8699 |
| Building Cleaning, Pest Control and Other Support Services | 6079 | 3076 | 130 | 11 | 3217 | 9296 |
| Admin & support services | 10246 | 7001 | 694 | 64 | 7759 | 17995 |
| Public Administration | 68 | 34 | 0 | 0 | 34 | 94 |
| Defence | 4 | 5 | 0 | 0 | 5 | 8 |
| Public Order, Safety and Regulatory Services | 681 | 476 | 87 | 8 | 571 | 1251 |
| Public admin & safety | 753 | 515 | 87 | 8 | 610 | 1353 |
| Preschool and School Education | 74 | 261 | 113 | 25 | 399 | 470 |
| Tertiary Education | 1142 | 885 | 68 | 9 | 962 | 2109 |
| Adult, Community and Other Education | 2047 | 1442 | 99 | 0 | 1541 | 3592 |
| Education | 3263 | 2588 | 280 | 34 | 2902 | 6171 |
| Hospitals | 97 | 40 | 19 | 8 | 67 | 168 |
| Medical and Other Health Care Services | 11685 | 10588 | 219 | 9 | 10816 | 22498 |
| Residential Care Services | 199 | 169 | 105 | 20 | 294 | 495 |
| Social Assistance Services | 1813 | 823 | 344 | 9 | 1176 | 2994 |
| Health | 13794 | 11620 | 687 | 46 | 12353 | 26155 |
| Heritage Activities | 29 | 32 | 11 | 0 | 43 | 78 |
| Creative and Performing Arts Activities | 1722 | 384 | 25 | 0 | 409 | 2114 |
| Sports and Recreation Activities | 1308 | 1339 | 137 | 11 | 1487 | 2792 |
| Gambling Activities | 64 | 106 | 6 | 6 | 118 | 180 |
| Art & Rec services | 3123 | 1861 | 179 | 17 | 2057 | 5164 |
| Repair and Maintenance | 6313 | 6628 | 153 | 6 | 6787 | 13096 |
| Personal and Other Services | 3443 | 4321 | 109 | 6 | 4436 | 7890 |
| Personal & other services | 9,756 | 10,949 | 262 | 12 | 11,223 | 20,986 |
| unknown | 2,970 | 917 | 45 | 9 | | 3,943 |
| ALL INDUSTRIES | 280,128 | 158,115 | 9,886 | 622 | 167,652 | 448,663 |
| non-farm businesses in affected industries | | 58,502 | 4,367 | 301 | 63,170 | |

Table 2: Total employment in Queensland, by industry, May 2019 and industries potentially affected by a partial public holiday on Christmas eve

| Industry | Full-time workers | Part-time workers | Total workers |
|--|-------------------|-------------------|----------------|
| Agriculture | 65.6 | 15.2 | 80.8 |
| Mining | 69.0 | 2.0 | 71.0 |
| Manufacturing | 143.0 | 26.8 | 169.8 |
| Utilities | 21.4 | 3.3 | 24.7 |
| Construction | 198.3 | 38.7 | 237.0 |
| Wholesale trade | 54.6 | 14.7 | 69.3 |
| Retail | 118.6 | 130.0 | 248.7 |
| Hospitality | 75.1 | 122.6 | 197.6 |
| Transport & warehousing | 103.5 | 30.4 | 133.9 |
| Info. media & telecomms. | 25.8 | 7.4 | 33.1 |
| Finance & insurance | 53.7 | 12.4 | 66.1 |
| Rental & real estate | 32.5 | 6.1 | 38.6 |
| Professional services | 127.5 | 43.9 | 171.4 |
| Administrative services | 56.5 | 35.7 | 92.2 |
| Public administration | 136.4 | 31.7 | 168.1 |
| Education | 129.8 | 84.0 | 213.8 |
| Healthcare | 216.3 | 140.2 | 356.5 |
| Arts & recreation | 26.4 | 23.0 | 49.3 |
| Other services | 76.4 | 30.5 | 106.9 |
| All industries | 1,730.3 | 798.4 | 2,528.7 |
| non-farm workers in affected industries | 1,066.4 | 562.4 | 1,628.8 |



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