

**The Pastoralists & Graziers Association of WA (Inc)**

**Submission to**

**WorkSafe Western Australia  
on the  
Draft Code of Practice  
for  
Workers' Accommodation**



**14 May 2026**

## **Executive Summary**

The Pastoralists & Graziers Association of Western Australia (PGA) welcomes the opportunity to provide feedback on the *Draft Code of Practice for Workers' Accommodation* (March 2026).

Having thoroughly reviewed the draft Code, including its specific application to the agriculture industry (Section 3) the PGA formally endorses the draft Code in its current format.

We find the document to be clear, practical, and appropriately balanced. It provides necessary legal clarity without imposing obstructive or unworkable obligations on agricultural producers. We acknowledge that the Code modernises accommodation standards (e.g., bed sizes, fire safety, gender separation), but we agree these are reasonable and necessary evolutions to ensure the health, safety, and dignity of Western Australia's vital agricultural workforce.

## **General Comments**

The PGA commends WorkSafe WA and the Mining and Petroleum Advisory Committee (MAPAC) on the tripartite consultation process that has produced this Code. Specifically, we appreciate:

- **Clear Thresholds:** The explicit three-part test for when the Code applies (PCBU owns/manages/controls *and* worker occupies *and* no other accommodation is reasonably available) provides legal certainty. This prevents confusion between WHS duties and standard residential tenancy arrangements.
- **Industry-Specific Guidance:** The inclusion of a dedicated section for agriculture (Section 3.1 – 3.6) is highly valuable. Addressing seasonal worker camps, shearers' quarters, backpacker hostels, and mobile accommodation acknowledges the diversity of agricultural work.
- **Practical Risk Management:** Chapter 6 (Managing hazards and risks) and Appendix 3 (Considerations for facilities and amenities) provide usable, checklist-style guidance. This allows producers to conduct self-audits and implement controls progressively.
- **Psychosocial Recognition:** The inclusion of psychosocial hazards (isolation, fatigue, harassment, lack of communication access) reflects the real challenges of remote work. The focus on controls (e.g., internet access, recreation, codes of conduct) is appropriate.

## **Specific Endorsements Regarding Agricultural Operations**

Based on our analysis of the draft Code we specifically endorse the following provisions:

Provision	PGA Position
King single or larger beds (p. 23, 39, 61)	Endorsed. While this requires upgrades to older shearers' quarters, it is a reasonable health measure. Beds must accommodate varying worker statures for proper rest and fatigue management.
Separate lockable sleeping areas for male and female workers (p. 23)	Endorsed. This is a critical dignity and safety measure. It may require low-cost structural modifications but is non-negotiable for modern mixed-gender workforces.
Climate control where practicable (p. 23, 39)	Endorsed. WA's extreme heat makes this a necessity. The "where practicable" qualifier appropriately recognises that some remote or temporary camps may have limitations.
Mobile accommodation standards (caravans, tents, trailers) (p. 23-24)	Endorsed. PGA members who supply mobile units must ensure electrical, gas and fire safety. Requiring serviced portable toilets separate from sleeping/eating areas is entirely reasonable.
Emergency plans (p. 22, 52)	Endorsed. A documented, communicated plan (fire, medical, weather) is basic risk management. The Code does not over-prescribe, allowing plans proportionate to camp size and location.
Contractor duty sharing (p. 24)	Endorsed. Clarifying that PCBUs sharing a workplace (e.g., a station owner and a shearing contractor) must consult, cooperate and coordinate is helpful. It prevents the "not my problem" defence.

### No "Alarming or Obstructive" Provisions

The PGA has specifically sought provisions that might be unworkable for small-scale, short-duration agricultural operations (e.g., mustering camps of 1–2 weeks). We confirm that:

- No explicit agricultural exemption is required at this time. The "reasonably practicable" standard (Section 1.3) provides sufficient flexibility.
- Catering/dietary requirements (p. 23, 40, 59) – while potentially logistically challenging – are correctly framed. The duty applies only *if* the PCBU provides food. Producers who cannot cater to complex dietary needs may lawfully choose to

provide meal allowances or self-catering facilities instead.

- The Code correctly excludes scenarios where workers choose their own hotel, motel, or private caravan (Table 1, p. 8). This prevents duty creep beyond the PCBU's genuine control.

### **Recommendation**

The PGA recommends that WorkSafe Western Australia:

1. Approve the draft Code of Practice in its current form without substantive amendment.
2. Develop agriculture-specific guidance materials (e.g., one-page checklists for shearers' quarters, seasonal camps, and mobile accommodation) to assist smaller operators with compliance.
3. Consider a phased communication campaign targeting the agriculture sector, given that many producers may not be aware of the new standards (e.g., bed sizes, fire alarms, gender separation).

### **Conclusion**

The PGA is satisfied that this draft Code achieves the correct balance: raising standards to protect worker health and safety while remaining practical and achievable for Western Australian agricultural businesses. We find nothing in the document that is alarming or obstructive.

We look forward to the finalisation and implementation of this Code and remain available to assist WorkSafe with any further industry-specific guidance materials.

Yours faithfully



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