

16 September 2022

Committee Secretary  
Health and Environment Committee  
PARLIAMENT HOUSE QLD 4000

Via email: [HEC@parliament.qld.gov.au](mailto:HEC@parliament.qld.gov.au)

## ARA SUBMISSION IN RELATION TO THE PUBLIC HEALTH AND OTHER LEGISLATION (COVID-19 MANAGEMENT) AMENDMENT BILL 2022(QLD)

On behalf of the Australian Retailers Association (ARA) thank you for the opportunity to provide comment on the *Public Health and Other Legislation (COVID-19 Management) Amendment Bill 2022* (the Bill) which introduces changes to Queensland's legislative framework for responding to the ongoing COVID-19 pandemic.

The ARA is the oldest, largest and most diverse national retail body, representing a \$400 billion sector that employs 1.3 million Australians and is the largest private sector employer in the country. As Australia's peak retail body, representing more than 120,000 retail shop fronts and online stores, the ARA informs, advocates, educates, protects and unifies our independent, national and international retail community.

Retail was at the frontline of Australia's pandemic response and so we have a strong interest in the public health measures and economic response by government at all levels, across Australia.

The pandemic has not only disrupted retail businesses, at times quite severely, it has also affected retail workers and their families. The impacts on some retail businesses are ongoing, particularly small CBD-based businesses as well as those in the hospitality sector who were again impacted by staff shortages over winter.

In principle though, the ARA strongly supports the Queensland Government's proposed approach to put in place a legislative framework to guide our COVID-19 response, limited to health measures, for 12 months following the expiration of the current emergency legislation on 31 October, 2022.

We note the following principles, which should guide future health measure responses to COVID-19:

1. **A harmonised and consistent national approach.** We continue to seek national coordination and alignment of protocols to avoid confusion for retailers, employees, customers and the public – including domestic and international tourists. Such an approach also makes it more cost effective and efficient for retailers to implement changes, particularly at short notice.
2. **Proportionate and fit-for-purpose measures, based on evidence.** At this stage of the pandemic, we have strong evidence to show which measures are most effective and can be proportionately applied and targeted to maximise health outcomes without unduly disrupting businesses.
3. **Consultation and lead-times.** Retailers have been extremely responsive to Government measures. However, there have been instances where processes have been unnecessarily inefficient, complex and costly resulting in confusion in measures that directly impact retail operations and their staff. In order to educate and update our members in a timely manner and provide direct feedback around the practicalities of any requirements, we ask that the ARA is consulted and kept abreast of changes at the earliest possible stage of decision making.

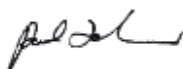
We therefore support the Bill that will enable the Chief Health Officer to respond and manage COVID-19 as a notifiable condition without requiring a public health emergency to be declared.

We agree that this is a proportionate policy response to assist Queenslanders in living and working with COVID-19, by allowing more targeted measures, with higher thresholds, to effectively manage the ongoing health risks to the community.

We also understand that this approach aligns with the approaches implemented in other states and territories and will enable the Chief Health Officer to issue directions that give effect to decisions made by the National Cabinet.

Thank you again for the opportunity to provide feedback, we look forward to engaging further as the proposed changes are made public.

Yours sincerely,



Paul Zahra  
Chief Executive Officer