



BEFORE THE FAIR WORK COMMISSION

Fair Work Act 2009 (Cth)

Title of Matter: 4 yearly review of Modern Awards - Review of Certain C14 rates in Modern Awards

Matter Number: C2019/5259

Document: Submissions in Reply to the President's Statement – 22nd September 2023:

- In respect of the provisional view in para [8]
- To the accuracy of the table at Attachment D
- Draft proposals for specific award variations
- Evidence upon which AMIC intend to rely.

Pursuant to Directions: Filed Friday 3rd November 2023

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AMIC Response – Review of certain C14 rates in Modern Awards **(C2019/5259)**

1.0 Australian Meat Industry Council (AMIC)

1.1 AMIC is the peak meat industry body representing retailers, wholesalers, meat processors, and smallgoods manufacturers across Australia. It has more than 1500 members spread across all sectors of the industry.

2.0 Introduction

2.1 AMIC makes the provides the following submissions and materials in relation to the Review of certain C14 rates in modern awards in accordance with the requirement of the Statement by the President on 22 September 2023:

- (a) submissions in respect of the provisional view stated in paragraph [8] of the Statement issued by President Hatcher, Vice President Asbury, and Deputy President Hampton on 22/09/2023 in relation to the Review of Certain C14 rates in Modern Awards [2023] FWCB 168, which stated:

“[1] The lowest classification rate in any modern award applicable to ongoing employment should be at least the C13 rate.

[2] Any classification rate in a modern award which is below the C13 rate (including but not limited to the C14 rate) must be an entry-level rate which operates only for a limited period of time and provides a clear transition to the next classification rate in the award (which must be not less than the C13 rate).

[3] The transition period for the purpose of (2) should not exceed six months.”

- (b) submissions as to the accuracy of the table at Attachment D
- (c) draft determinations or proposals for any specific award variations that might be necessary; and
- (d) evidence upon which we rely to support our submission.

SECTION A

THE PROVISIONAL VIEW OF THE FULL BENCH

- 1) AMIC agrees that:
 - a) the lowest classification rate in a Modern Award applicable to ongoing employment should be at least the C13 rate; and that
 - b) a classification rate in a modern award which is below the C13 rate (including but not limited to the C14 rate) must be an entry-level rate which operates only for a limited period and provides a clear transition to the next classification rate in the award (which must not be less than the C13 rate); and that.
 - c) the transition period for the purpose of (b) should not exceed six months.

SECTION B

AMIC SUBMISSIONS AS TO THE ACCURACY OF ATTACHMENT D

As per below – Table Reflects Current State of C14

AMIC submits it is the accurate *current state* of the C14 wage rate in the Meat Industry Award 2020

<i>Meat Industry Award 2020</i>	MA000059	16.1	MI 1	\$859.30 (at C14)	Category (iv) – undergoing on-the-job training for an initial period of at least 3 months (cl A.3.1).	MI 2 = \$888.10
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16. Minimum rates

[Varied by [PR720159](#), [PR718877](#), [PR729317](#), [PR733854](#), [PR740742](#), [PR762168](#)]

16.1 Adult rates

[16.1 varied by [PR718877](#), [PR729317](#), [PR740742](#), [PR762168](#) ppc 01Jul23]

An employer must pay adult employees the following minimum rates for ordinary hours worked by the employee:

Employee classification	Minimum weekly rate (full-time employee)	Minimum hourly rate
	\$	\$
MI 1	859.30	22.61
MI 2	888.10	23.37

A.3.1 Meat Industry Level 1

An employee at this level will be a person with no experience in the industry undergoing on-the-job training for an initial period of at least 3 months.

SECTION C

AMIC SUBMISSIONS – PROPOSED AWARD VARIATIONS

PROPOSED SCHEDULE A – CLASSIFICATIONS – MEAT INDUSTRY AWARD 2020

A.3.1 Meat Industry Level 1

An employee at this level will be a person with no experience in the industry (or less than 3 months continuous experience in the preceding 5 years) undergoing on-the-job training for no longer than six months.

SECTION D

EVIDENCE ON WHICH AMIC RELY TO SUPPORT OUR SUBMISSIONS

1.0 Outline of the evidence:

- 1.1 AMIC relies upon the statements of Cheryl Wolans and Lyle Ward filed in connection with this matter.
- 1.2 It is submitted that the contents of those statements demonstrate the following broad contentions made by AMIC in support of the proposed draft Award clause.
- 1.3 The Meat Industry Award covers a very wide variety of facilities, both in terms of the size and technological advancement of the employer's operations, but also the nature of the work being performed. The Award is expressed to cover meat processing establishments, meat manufacturing establishments, and wholesale and retail facilities, all of which are defined in the Award.
- 1.4 Businesses conducted under the Award can vary from a small handful of employees in a local retail butcher shop to several hundred or even thousands of employees in a world-class meat processing or meat manufacturing establishment.
- 1.5 The very substantial majority of the work of employees covered by the Award involves the use of machines, tools and processes which are designed for the cutting, movement and processing of meat, bones, hides and other by-products. Despite significant technological advancement in the past few decades, a large part of the work is done by the use of extremely sharp knives and other cutting implements, and is undertaken by hand, or by employees utilising cutting or processing machines of various kinds. There are usually a very substantial number of overhead chain systems and conveyor belts, all of which have a very high number of dangerous pinch points which can cause catastrophic injury if proper procedures are not followed.
- 1.6 Much of the work is extremely dangerous if not performed in accordance with definite and prescribed rules and procedures, and with rigorous compliance with safety standards, both as to personal safety and the safety of others working in the vicinity of the employee. A substantial amount of time is spent cleaning and maintaining the plant

to the high standards required, which often requires employees to work closely with running machinery and dangerous equipment, in order to ensure that it is properly cleaned. In those circumstances, non-compliance with safety rules in relation to exposure to such equipment, particularly where safety guards are required to be removed for cleaning purposes, can have extremely serious consequences for employees.

1.7 The work mostly concerns the production of edible food, so that compliance with the safety standards, export control standards, and general food hygiene principles is absolutely essential at all times, so that the product is safe and saleable.

1.8 A new entrant to the industry is highly unlikely to have any experience or background in a similar type or combination of dangerous equipment, tools, and environmental factors.

1.9 It is simply not possible or practicable to introduce a new entrant to the industry into such an environment without lengthy and thorough training and induction into the nature of the work they are required to perform, and the procedures which are devised to protect employees from the multiple dangers and hazards that they will encounter in the workplace in the ordinary course of their work.

1.10 No two meat processing or meat manufacturing facilities in Australia are the same in terms of layout, equipment, or the sophistication of technology and the processes or procedures for production, personal safety, and food safety. It would be very rare (if it exists at all) for any two meat processing or meat manufacturing establishments to produce the same meat products to the same cuts and specifications. If this did occur, it would almost certainly not be done in the same way, by the same processes.

1.11 As the C14 rate is accepted to be an initial training rate of pay, it is submitted that it is necessary that the Full Bench have regard to the training requirements of facilities covered by the Award. In that regard, the initial training requirements at a three-person retail butcher shop would of course be dramatically different from the initial training requirements at a meat processing establishment that employs many hundreds of people at any one time and kills several thousand head of livestock each week.

1.12 The new employee must be trained, or at the very least, made aware of the nature and workings of the extensive amounts of sophisticated and complex machinery that

would exist in the meat processing plant, all of which presents a potential workplace safety risk to an uninitiated new employee. In addition, the new employee must be trained and familiarised in the operation of the equipment tools or product which the new employee will be physically handling or encountering in their employment once the training and induction is completed.

- 1.13 It is submitted that the standard of initial training must be such that the employee can be relied upon to work within the work area to which they have been allocated, and to move in and about other work areas where they might be required to travel at any time during their work, without constant and direct supervision for the purposes of protecting their health and safety, the health and safety of employees around them, and ensuring that product safety is also ensured.
- 1.14 It is submitted that a safety response to such a vast array of potentially dangerous equipment that might be found in processing, manufacturing, and larger wholesale and retailing facilities, must be so well ingrained in the employee that it happens as a matter of instinct, rather than any other consideration.
- 1.15 That is to say, a mere introduction or mention of such equipment and its operation and effects would never be sufficient to ensure that the worker could then be engaged to work safely within that plant without constant and direct supervision. The rules and regulations surrounding the operation of that equipment, and the proper selection, wearing and maintenance of personal protective equipment, must be repeatedly reinforced over time to such an extent that an employee can be relied upon to react more or less instinctively as required, without direct supervision or instruction from another employee.
- 1.16 The time taken to attain this standard cannot be predicted in advance with any real certainty. It might be possible to say that it is likely to be a matter of a few weeks for a small retail butcher shop, because of the availability of constant supervision and limited amounts and variety of dangerous equipment. Evidence adduced also strongly suggests that it is highly likely to be well in excess of three months in meat manufacturing and meat processing establishments, which by their very nature are generally of a medium to large size, have a substantial array of dangerous equipment, routinely use knives and other cutting equipment, and have a workforce varying from less than 100 to several thousand.

1.17 Until that standard is achieved, the new employee is likely to be occupying a significant part of the time of another more experienced employee, in direct and constant supervision, whilst not being in a position to provide any significant return to the employer. Whilst this is an unavoidable feature of the training function, it is submitted that the recognition by the Commission of the continued existence of a transitional training wage indicates an acceptance that an employer who is providing the time of a trainer or mentor, and obtaining little or no return from the trainee, should be entitled to maintain a training wage such as the C14 rate for the actual period in which the training is occurring, rather than some nominal predetermined “one size fits all” rate which may have no application to the actual employment.

1.18 The Award clause submitted by AMIC is a diminution in the entitlements of the employer under the pre-existing clause, which was limited by “at least three months”, with no end date. The proposed clause allows for a transition of an employee to the C13 rate well short of the previous three months minimum, in circumstances such as those submitted above, where the relevant level of expertise or familiarity with the work environment reaches the minimum standard in a shorter time period. The clause however also maintains the ability of the employer to maintain an employee at the C14 rate in circumstances where the difficulty or the danger of the work or work area might require a longer period of training for an employee, where the employee may remain unproductive for a longer period.

1.19 It is further submitted that the period of a maximum of six months would allow the employer sufficient time to assess whether the trainee is likely to attain the relevant level of expertise at all, or whether it might be preferable to terminate the employment relationship, presumably during an equivalent probation period. If an employee had demonstrably not attained the relevant expertise at six months, the employer would be required to transfer the employee to the C13 rate and bear any additional cost, or to end the employment on the basis that it is unlikely to be mutually beneficial.

1.20 Any shorter mandatory period of transfer to the C13 rate before the employee has had an adequate opportunity to attain the relevant standards, may operate unfairly to the employee.

1.21 It is submitted that the proposed AMIC clause serves all of the purposes mentioned in the Statement by the Full Bench in its provisional conclusion, having regard to the somewhat unique circumstances of the meat processing industry and the disproportionately higher requirement for personal safety and food safety standards to be acquired and reinforced, before an employee can be trusted to work safely in what is often a very dangerous work environment.

1.22 The clause also permits the time for transition of an employee to be significantly less than the mandatory maximum, and AMIC is disposed to consider the possibility of introducing words into the present proposed draft clause to ensure that the clause is not automatically adopted as being a standard. Of six months, even in circumstances where the required level of expertise is reached before that time, as explained above.

Witness statement

Name	Cheryl Wolens
Position	General Manager – Workforce Services

Witness statement

My name is Cheryl Wolens, and I am employed by AMIC as the General Manager of Workforce Services. I have been asked to give evidence for AMIC in relation to the C14 rates in the Meat Industry Award 2020, to assist the Commission-initiated review of the C14 rates in the awards.

I am aware that AMIC opposes the Union suggestion of limiting the duration of C14 rates to one week, and AMIC has proposed an outer limit of 6 months.

I have experience in the industry (and in relation to training in the industry which directly relates to the question of C14 and the length of time until someone is deemed competent) which can assist and explain why in my opinion there needs to be the ability for an employer to have up to 6 months, before a new to industry employee moves classification up to the next level and is a productive and competent employee to perform the role without being a risk to personal and food safety.

I have worked in multiple plants Primo Foods Pty Ltd / JBS, Kilcoy Pastoral Company / Kilcoy Global Foods / Kilcoy Cuisine Solutions, and can speak from personal experience as to the significant diversity that presents itself in relation to training requirements across different meat plants and the many variables that would affect the length of training that is required before a new entrant is able to work unsupervised, or perform activities that go beyond on the job training and learning.

The Meat Industry itself presents many challenges that are not often found in general industry, in relation to food and personal safety, levels of automation within a plant, types of workers available, geographic dispersal, ethnic and language barriers and customer requirements. From a training perspective, every individual is different, and their learning styles are different, their literacy level, their understanding of languages used in the plant, their fitness, their understanding of a work environment generally, even their physical attributes can make those variables increase and training time increase.

In most cases, new (or almost new) entrants to an industry (in some instances new to the workforce generally) could never be permitted to walk around a plant unsupervised after a week with potentially 10 different items that could affect their safety or food safety. In relation to this review, AMIC are not suggesting that each and every company will utilise the full 6 months in order to get their employees up to the required standard, but in my opinion, the training period must have an outer limit which can accommodate all the many variables that would affect the length of training required, having regard to the very wide variety of businesses which are participants in this industry

There are several sources of the duties to which a Meat Industry employer is answerable.

I strongly believe, that at a minimum, it would require at least 3 months (depending on transferrable skill, learning aptitude, complexity of plant and other variables), and at a maximum outer limit of 6 months before an employee could be trusted to work in a meaningful task without constant close supervision.

Some of the considerations to which a meat industry employer must have regard are:

1.0 Workplace Health and Safety Laws.

PCBU Obligations.

1.1 A person conducting a business or undertaking (PCBU) has a primary duty to ensure the health and safety of workers while they are at work in the business or undertaking and others who may be affected by the carrying out of work.

1.2 The primary duty of care requires [PCBUs](#) to ensure so far as is reasonably practicable that they:

- provide and maintain a safe work environment.
- provide and maintain safe plant and structures.
- provide and maintain safe systems of work.
- that they engage in safe use, handling and storage of plant, structures, and substances.
- provision of accessible and adequate facilities (for example access to washrooms, lockers, and dining areas)
- provide appropriate instruction, training, information, and supervision.
- monitor workers health and conditions at the workplace and
- maintain any accommodation owned or under their management and control to ensure the health and safety of workers occupying the premises.

2.0 Differing plants require different knowledge.

It is a well-known fact that no two meat processing or meat manufacturing plants in Australia are the same. This means that one company might have extremely simple and automated tasks (not as much to learn) whereas another company may engage in a number of onerous manual type tasks which all have to be learnt. This will have a significant effect on time required to train an employee to work productively and safely in a useful or meaningful task.

2.1 All sites, whilst similar in nature, have nuances specific to each site, department, and tasks. This could be from chain speed, to processing floor layout to intricacy of tasks, depth of knowledge on product and product/plant requirements, skill around certain tools, such as knives, saws, hooks etc. and day-to-day operational adjustments as required.

Differing and varying complexity of equipment.

2.2 Equipment, whilst often superficially similar, will require time to learn and use in different work operations and in a safe manner. Not all sites have all the same equipment nor usage due to size, scope, product, business requirements, financial resources, and deliverables.

Health and food sanitation laws and HACCP.

3.0 Health and Food Sanitation Laws

Hygiene

3.1 Hygiene knowledge and skill is key critical for all sites and products. The risk of failing to understand (or not undertaking sufficient training) and be competent in hygiene could see

a business temporarily stopped or permanently closed by health and quarantine authorities.

- 3.2 A food hygiene failure could cause brand and product damage which would not only impact on the site but inevitably the global market. It also impacts quality, shelf life and poses significant cost to business.

4.0 Health and Food Sanitation Laws

HACCP – Hazard Analysis Critical Control Points (Food Safety)

- 4.1 HACCP is a world-renowned [food and safety risk management](#) method, that is designed to ensure that catering, hospitality establishments, and organizations adhere to proper food safety regulations. This means serving customers with clean and safe, yet palatable food that is produced in sanitary conditions. In turn, this gives customers, regulators, and the public, peace of mind knowing that a proper food safety program is being followed and maintained at their preferred establishment.
- 4.2 The [HACCP program](#) is very important as it can directly mitigate incidences such as product recall or customer complaints, by effectively managing the risks associated with handling raw materials, different implements, and common errors, which can be extremely costly for industry.
- 4.3 The HACCP program also helps to increase awareness about these risks while improving the overall performance in implementing the different processes that go into creating the final product. Additionally, compliance with the HACCP program automatically places a business into alignment with the Food and Drug Administration’s Food Safety Modernisation Act, which is aimed at ensuring complete food safety and control.
- 4.4 No matter the plant, all workers need to be educated and trained in hygiene of self, tools, equipment, cleaning of PPE as well as the impacts that poor hygiene can have on the individual, product, brand, and consumer. This is difficult for our workers to understand and retain, as it is not necessarily a skill that they will have learned in any other industry, however, key elements of cleaning, cross contamination, and chilling must be known. There are different rules and protocols to be followed that are unique to each scenario and each plant, and you must adhere to them to maintain a hygienic workplace while providing safe food to your customers.

5.0 Site Specific Requirements

- 5.1 Each business will have its own site-specific requirements and as such, sufficient time must be allowed for these to be shared, understood, and adhered to. Duration of time varies based on individual needs such as language, literacy, and [rostering](#). This is by no means an exhaustive list but clearly demonstrates that one week is insufficient when a worker is new to industry or, has had only limited time in an operational environment. Even moving from one plant to another can require significant training. Entering the industry for the first time requires far more onerous training procedures.

6.0 Training time required for product, safety, quality, and literacy knowledge.

- 6.1 Training time for product, safety, literacy, and quality knowledge will be an ongoing process as new to industry employees learn and become proficient in one area upon commencement.

This is to assist with learning all the required information needed before learning a new skill or product. These basic tasks only position new employees to learn skills necessary to progress through the classifications. These tasks do **not** render them fully functional workers due to limited knowledge and time in industry.

6.2 **Brand**

Having adequately trained employees can substantially affect an employer's brand. New to industry need support, training and guidance and time to learn their craft, and will have tutors, buddies and supervisors who are all required to spend time shadowing the new employees closely until they are demonstrated to be competent and to have the confidence to be able to perform the task(s) with limited supervision.

6.3 **Cost and impost of training**

Intensive training (defined as extensive training in a short period of time), is certainly not best practice, nor the ideal in our industry for many reasons. Studies have shown that learning large volumes of information in short spaces of time is not conducive to solid and competent outcomes. Best practice is to afford an appropriate amount of time to learn across various platforms over the course of time, to ensure that the information has been absorbed and processed sufficiently to demonstrate competence. Intense training timeframes are not a feasible option for this industry. It would greatly increase our risk profile to do so, and I have seen this time and time again at every meat industry employer that I have worked for.

6.4 **Quality of training**

The industry must be able to demonstrate that the training provided is of substance and meets the training requirements and standards to ensure that our workforce is competent, compliant, and safe. One week is nowhere near sufficient time to be able to demonstrate competence, by any reasonable standard.

7.0 Workplace health and Safety

Incidents investigation

- 7.1 Unfortunately, incidents and accidents do occur in the industry. I have been witness to many of these unfortunate events. The first part of the investigation begins with being able to demonstrate that the people involved were adequately trained, and being able to prove competency that aligns to the task at hand and aligns to the time in role and industry. Very significant penalties, apart from the injuries to the worker, can apply in circumstances where it cannot be demonstrated that sufficient time was devoted to the proper training of an employee who has been allocated a particular task. A one-week training period could never be considered sufficient for a new entrant to the industry. A six-month period (as an outer limit) with a new to industry process is towards the lower limit of what might be expected, for the safety aspect alone.

8.0 General Observations

- 8.1 Many industries have guidelines in place to be able to have a consensus on required training time. Unfortunately, there are no across industry standards for training and competency in our sector. It may be that in the Meat Industry the variables and diversity in plants are so great, the level and variability of risk and safety concerns are so great that it is not possible to

adequately define an accurate period. All that can be said in my opinion is that there is no possible chance that one week would be an adequate period.

- 8.2 In my opinion, it comes back to task, time in industry, individuals' ability to learn i.e., how they learn and type of learning. It also depends on the complexity of the task. The meat industry is quite a complex working environment and injuries are prevalent without the appropriate training and time to learn.
- 8.3 On my observation, employees generally come in as a new to the industry operator and have their first day completing a site induction. The second day they are taken to their designated area and then have another department/area induction and after this are then taken through work instructions, PPE, hazards, meet their supervisor, buddy and tutor who will be with them constantly for approximately eight to twelve weeks to ensure they are learning, have someone they know to ask questions, and someone to show them how things are done, from a single task to the whole process.
- 8.4 New employees must be shown what personal protective equipment (PPE) to wear and how to wear it, knife sharpening (which is an acquired skill and needs to be taught properly and safely), manual handling, stretching, along with where you can and cannot go in a plant, how to get around plant etc. The learning curve upon commencement is very steep for new to industry employees.
- 8.5 The training time per task can also significantly vary and some can achieve competency quicker, but some also can take longer, so an average time frame is applied across the sector as a rule of thumb. However, employers need to be sure that employees know what they are doing and are capable and competent to be able to perform the task on their own and meet the requirements of sector such as food hygiene, standards, quality, process, customer requirements, understanding product and equipment etc.
- 8.6 This is not a quick process and does take considerable time. It is easy for someone who has been in industry for some time to have a general opinion for a timeline, but the time required for training must always be regulated by the individual and their competency. The timeframe which is set must provide an outer limit which ensures the substantial majority of individuals will be competent, and is not as a *nice to have*, but as a *must have* for safety reasons (for both employees and the customers consuming the final product).
- 8.7 Maintaining new employees at a training wage for the period of their training is not merely a cost saving measure. The costs associated with injury and turnover are immense, insufficient training or too short a time for training can be costly all round, and quite often is. Time off work due to any type of injury, workers compensation, etc. is costly for the company, employee, and the employee's family, even the broader community.
- 8.8 In the situation where an injury has been sustained, compensation is costly for the employer, their brand, their bottom line, and their reputation in their industry. For the employee, dependent on the severity of the injury, the injury could greatly affect the employee's future capacity to earn a living to support themselves and their family. The compensation (again, dependent on the injury), is not always enough to support their family ongoing, which means the whole family's quality of living is affected, the employee's mental health can be affected, and the flow on effects can be quite catastrophic. No one wants to sustain injuries at work,

and everyone should have the right to return home each day healthy and safely. The costs to everyone involved are too great.

9 Safety Statistics

9.1 My research suggests that WorkSafe Queensland recorded between 2015 and 2020, and workers in red meat (including pork and game meat) processing workplaces lodged over 5000 injury claims. Thirty-nine percent of these were young workers, casuals, and labour hire. The type of mechanism of injuries included:

- 9.1.1 Muscular Stress when handling objects
- 9.1.2 Fractures and soft tissue injuries from being hit by falling and moving objects.
- 9.1.3 Cuts and lacerations from knives
- 9.1.4 Fractures from falls from heights
- 9.1.5 Amputation and fractures from between trapped between stationary and moving objects.

9.2 WorkSafe Queensland were so concerned that they brought about a campaign to focus on reducing and preventing injuries to workers at meat processing workplaces.

They worked with employers and employees placing a focus on:

- systems of work
- consultative arrangements
- hazards, risk management and reporting
- information, training, instruction, and supervision
- hazardous manual tasks
- fixed plant
- working at height and falling objects
- slips, trips, and falls at level.
- hazardous chemicals
- hand tools
- biological hazards.

9.3 All of the abovementioned safety and sanitation requirements (not to mention skill in the task) are what I believe to be non-negotiables. I do not believe it is only a one-week activity and supports a period of training time that allows these measures to be adhered to for the future betterment of our industry, attracting employees to work in a safe industry that provides solid training.

Witness statement

Name	Lyle Ward
Position	Training & Workforce Advisor

My name is Lyle Ward and I have over 25 years' experience in the meat industry. 14 of those years I spent specifically on training, tutoring and have been engaged in roles up to and including Training Manager r.

A "new to industry" employee requires considerable time to become fully competent in all aspects of their employment, even at the lowest classification. Meat processing and meat manufacturing in particular, involve the marshalling and killing of substantial numbers of livestock each day, and processing those carcasses into meat and meat products, and byproducts and hides, by use of a wide range of cutting, tearing and crushing devices.

The floors that are required to be walked on in many cases are slippery with blood and other products and the machinery that is used can cause very serious injuries to an employee, if they are not used properly and skilfully, or if an employee accidentally comes into contact with them.

At the outset, new to industry employee needs to learn to safely transversing around a production site, (carpark – amenities – work area). They then need to safely and hygienically get prepared for work (clothing/PPE/Equipment). After having accomplished these basic tasks, they must learn to safely and hygienically perform a range of operational tasks to appropriate standards to meet government (domestic & international)/customer/consumer and establishment standards). They must then learn at end of their shift, how to safely and hygienically get prepared to go home, again following all standards mentioned above. Because of the extraordinary risks and potential for very great harm to employees because of the nature of the work and the equipment being used, safety is always the first priority in everything that is taught and done in a plant, whether it be a small retail butcher shop or a very large meat processing plant.

There is a large number of tasks and activities which must be taught and learned properly, including the safety of themselves all the other employees. There also a large number of food hygiene and safety considerations, as industry must provide products safe for consumption. I then responsible for the implementation of programmes for new employees in three medium to large plants as well as at distribution centres/warehousing areas.

At a general level, after an initial induction program, the employee' s learning continues through to specific work instruction, tutors, a buddy system and on the job learning. I personally have instructed/shown new employees the correct way to get around the factory without risks to themselves and others, which can be a very complex and difficult exercise. From the car park, employees must learn the use of designated walkways and understand specific traffic management programs. They must walk through to the site laundry to collect work clothing, then to the change rooms, lunchrooms and then learn how to correctly use and maintain their PPE. After all those things have been achieved, the employees are able to enter the factory floor.

Processing plants have many restricted areas, where it is not safe for any worker other than those actually engaged in that area to enter. New employees may be prone to undertaking shortcuts when moving around the plant, which is extremely unsafe as they may travel through areas that could be very dangerous.

I have always stressed the importance of this first part (the training program) of a new employee's journey.

The next consideration is operational safety. An employer must ensure employees are equipped with relevant PPE for the worksite and particular tasks and new employees are also responsible for maintaining their PPE. This can take time for a new employee to fully understand, I have seen many times where an employee may misplace their PPE and then not followed up to obtain new equipment, putting themselves at risk.

There is also the consideration of having to replace the PPE, when worn or damaged, this requires tutors/supervisors and the like to constantly follow up and check whether the employees are reliably compliant. Safety, performance, and employees PPE, require constant supervision, and ensuring correct fit/fit for task and also wear and tear.

There is no uniform or achievable way of ascertaining in advance how long the teaching and reinforcement of these activities must continue before an employee can be safely allowed to work without constant close supervision.

The industry relies very much upon a large migrant workforce. These employees are coming in from overseas are often entirely unfamiliar with our requirements in safety/hygiene and everyday work practices we take for granted. All of these standards are required to be taught, in addition to the operational methods which are employed in the particular plant. In my many roles, I have spent many days instructing, correct work practices, constantly following up, helping new employees get the basics of meat processing.

As an industry we invest heavily in training/tutoring programs, including department tutors. A tutor is typically a FTE employee, not working on a production line, but has extensive experience in their said department. The tutor will follow up constantly with new employee, ensuring that the employee is receiving support and guidance both on the job and in all other areas as mentioned previously. Many employers may also use translators as needed for employees whose first language is not English. These translators work alongside tutors. It is simply impossible for all of these tasks to be able to be taught within the space of one week. The achievement of the required degree of awareness as to safety is effectively impossible.

A new employee can learn a particular task, but a fully competent person must check their product and perform final inspection on their work prior to product moving on. I have then used this philosophy throughout my time in industry to ensure a structured learning program and maintain appropriate food safety standards. The below table is an example of what occurs in a food safety sense, remembering along this schedule constant feedback is sourced by supervisors/QA's/Tutors & provided to all relevant parties.

Sample new entrant plan

% of Task	Competent Employee	New Employee	
Day 1	100%	0%	1st Day (on task) employee will watch process, perhaps assist moving product around on workstation
Day 2	97%	3%	2nd Day employee starts to undertake beginnings of task, once completed agreed proportion steps back, washes hands continues observation
Day 3	95%	5%	3rd Day employee starts to undertake beginnings of task, once completed agreed proportion steps back, washes hands continues observation
Day 4	90%	10%	Days 4/5 I would always keep these at same level of participation, remembering these are new to industry employees, by this time in 1st week, they are suffering from soreness in feet/hands & general body aches & pains.
Day 5	90%	10%	

Day 6	90%	10%	Coming back from weekend or rostered days off, I would keep at same participation as on their last day, this day would be a refresher day & not too strenuous on the body.
Day 7	85%	15%	Gaining more confidence in performing task
Day 8	85%	15%	Gaining more confidence in performing task
Day 9	80%	20%	Gaining more confidence in performing task
Day 10	75%	25%	After 1st 10 shifts a new to industry employee may be at the level of performing a quarter of a task to appropriate standards.

Day 11	70%	30%	As new employee progresses & gains confidence/experience in task they will gradually increase participation of said task
Day 12	65%	35%	Gaining more confidence in performing task
Day 13	60%	40%	Gaining more confidence in performing task
Day 14	55%	45%	Gaining more confidence in performing task
Day 15	55%	45%	Gaining more confidence in performing task

Day 16	55%	45%	Gaining more confidence in performing task
Day 17	50%	50%	Gaining more confidence in performing task
Day 18	50%	50%	Gaining more confidence in performing task
Day 19	45%	55%	Gaining more confidence in performing task
Day 20	45%	55%	Gaining more confidence in performing task

Day 21	40%	60%	Gaining more confidence in performing task
Day 22	40%	60%	Gaining more confidence in performing task
Day 23	35%	65%	Gaining more confidence in performing task
Day 24	30%	70%	Gaining more confidence in performing task
Day 25	30%	70%	Gaining more confidence in performing task

Day 26	25%	75%	Gaining more confidence in performing task
Day 27	25%	75%	Gaining more confidence in performing task
Day 28	20%	80%	Gaining more confidence in performing task
Day 29	15%	85%	Gaining more confidence in performing task
Day 30	15%	85%	Gaining more confidence in performing task

Day 31	10%	90%	
Day 32	10%	90%	
Day 33	5%	95%	Very close to full understanding in a food safety aspect of original task
Day 34	5%	95%	
Day 35	0%	100%	New employee's 1st day performing full task - competent person still conducting final checks

Day 36	0%	100%	
Day 37	0%	100%	
Day 38	0%	100%	
Day 39	0%	100%	
Day 40	0%	100%	After a week of performing full task with competent person doing final checks a supervisor/QA will review progress & seek/provide feedback to new employee/competent person/tutor & team

With all new to industry employees, I have always liaised with supervisors/managers/tutors on their requirements/positions needed filling and the suitability of new employees coming into their departments. We would often find and need to adjust planning, as new to industry employees would take some time to obtain a level of work fitness, so instead of going straight on to a proper task as may be listed in the Meat Industry Award or an establishment's Enterprise Agreement, new to industry employees would commence on a "soft landing" task, not adding value to production.

These types of tasks would include.

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- Helping erect cartons
 - Maneuvering boxes along conveyers
 - Assist in moving product to different workstations/areas.
 - Condensation removal/cleaning – Condensation is moisture buildup/droplets on ceilings/walls, new employees may be required in a particular area to remove condensation using mops.
 - Cleaning – depending on areas of placement – for example if in warehouse area, before a new employee is placed into an area of stacking pallets of boxes of meat, they first will conduct cleaning tasks (sweeping etc.)
 - Collection & delivery of packaging materials within a designated work area.
 - Assisting in movement of pallets/cartons/materials from storage/delivery areas using pallet jacks
 - Collection of materials/products for correlation
 - Assisting in an establishment's laundry areas, putting clean clothes away, storage of new PPE, removal of old boots/dirty clothes from locker rooms
 - Collection & delivery of consumables to a department's storage area, e.g., latex gloves, hair nets, paper towel,
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After a period of time, when a new employee can perform these tasks by themselves the employee will move to a new position to learn off another competent employee (most likely a production task as this employee has completed a work hardening program). The new employee will continue on these tasks until they are work fit and the next new employee commences, taking over from the previous new employee.

I have found this structured approach benefits both the new employee and establishment where they are employed. It also provides an opportunity for the department supervisors/QA's/Tutors to ascertain/plan where the new employees next position will be, along with providing the new employee time to adjust to employment within a meat processing facility.

This would take a minimum of 4-6 weeks/rosters before ready to move to next position, remembering that, when going into a production position, we would follow the previous table's philosophy regarding food safety, as
