

Inquiry into the cause of fatality and injury on Victorian farms - submission

**To: The Executive Officer
Rural and Regional Services and Development Committee
Level 8, 35 Spring Street
MELBOURNE VIC 3000**

Please find to follow my submission to the inquiry into the cause of fatality and injury on Victorian farms.

I am currently on secondment from WorkSafe Victoria to the Department of Education. However, I submit this response as an individual, not on behalf of any organisation.

I wish to explain my interest and qualifications in providing this submission. I was engaged as the Victorian Farmsafe Alliance Manager for around four years, between June 1999 and August 2002. Further, I held the position of Farmsafe Victoria Executive Officer from 2001 to 2002. In the capacity of these roles, I was required to develop the inaugural Farmsafe Alliance Strategy and to encourage the farming community to engage with farm safety initiatives through the formation of Farm Safety Action Groups. At a national level, I held the position as Chair of Farmsafe Australia's Child Safety committee from 2001 to 2002.

I believe I have the necessary professional background to be able to provide a considered response to this inquiry. Further, I am one of the few people with a farm safety background that possesses both OHS and health promotion qualifications. This further allows me to provide a measured view on the range of strategies that have been adopted in promoting farm safety both in Victoria and nationally.

Above all, I support no organisation's view on farm safety in this submission. The views expressed are my own, based upon my own professional background and experience in this industry.

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Response to the Terms of Reference

1. This submission does not respond directly to Items 1, 2, and 5 of the Terms of Reference, sufficient to state the following. My views on the causes and associated financial and social costs of fatality and injury on Victorian farms will add no further insight than is provided by WorkSafe Victoria or by Dr Lesley Day from the Monash University of Accident Research Centre (MUARC). Because the pattern of injury and death on farms in Victoria correlates closely to the pattern of injury and fatality on farms nationally, it is advised that your Committee consider farm safety research by the Australian Centre of Agricultural Health and Safety and Farmsafe Australia.
2. My submission to this Inquiry is in response to the Terms of Reference (TOR) items 3, 4 and 6. However, this response is prepared in a progressive format beginning with:
 - a. the failure of current programs and initiatives (TOR Item 3), which;
 - b. arises from a number of impediments to sustaining improvements in farm safety (TOR Item 4), that leads to;
 - c. a recommended way forward (TOR Item 6). My fundamental contention is to implement an innovative governing strategy that will be inclusive and deliver effective injury prevention outcomes (refer to points 10-13).

Terms of Reference Item 3 – Current programs and initiatives designed to improve OH&S on Victorian farms.

3. A failure in the past to preventing or minimising injuries/fatalities on farms has been that farm safety programs and media campaigns have most often adopted a 'one-size-fits-all' approach. A 'farm' is often categorised or viewed by many injury prevention stakeholders as being commodity specific, for example a dairy farm, a grain farm, an orchard etc. However, there is great variation in the farming practices within each commodity group. An orchard can range from a family enterprise, which only grows fruit or can be a large exporter, employing many staff (both permanent and itinerant), with a processing plant within the confines of the farm. A generic farm safety approach to these two vastly different farming practices is likely to ensure that neither farm manager is engaged by the strategy or, one farm manager will be engaged at the expense of the other.

4. A generic approach to farm safety does not resolve all issues. Utilising both a 'public health' model and an Occupational Health and Safety (OHS) model will be helpful in building bridges between all stakeholders in moving towards accepted farm safety strategies. An injury has a dire effect on both work productivity and on the social fabric of a rural community. It would serve the best interests of the farming and rural community if both a public health and an OHS approach were considered collectively in addressing farm safety.

Terms of Reference Item 4 – Any impediments to sustaining improvements in farm safety.

5. There are divergent views on the causes of injury and fatality on farms between union and industry association stakeholders. Essentially, the differing views are that farm injuries and fatalities are either mostly attributed to work-related activity or are mostly attributed to leisure and lifestyle activities. This is an erroneous argument as regardless of the nature of activity, farm injury has the same impact on individual health and the social fabric of the rural community. This ongoing debate only serves to diminish an effective and agreed approach to injury prevention on farms. Farm work activity and lifestyle are inter-related. Therefore, all settings and activity must be considered in farm injury prevention strategies.
6. Stakeholders' broad agendas do influence farm safety initiatives and funding opportunities. This influence has impact on the effectiveness to reduce injury and death on farms. Farm safety strategies and programs must relate to hard facts (available data), not the innate or political needs of organisations, including the agenda of some to service the interests of its members, whether they are farming associations or unions.
7. WorkSafe Victoria is unduly influenced in its approach on farm safety by stakeholder views and political party agenda. The approach taken by WorkSafe Victoria appears dependent upon which political party is in power. For example, there is currently a focus on compliance to the OHS Act (1985), whereas during the incumbency of the previous government, the focus was around providing advice, information and driving public awareness campaigns. Varying political views that can influence the operational agenda of WorkSafe Victoria does presents a barrier to long-term safety strategies and funding opportunities.

8. Many WorkSafe Inspectors lack understanding of the work practices and culture associated with agriculture. This creates a view by farmers whereby WorkSafe Inspectors lack credibility in the field.
9. The role of the Victorian Farmsafe Alliances needs to be clarified. Is it the role of the Alliance to adopt a public health approach (Farm Safety Action Groups) or adopt a risk management (OHS) approach? Further, it appears that the Alliance has been tainted by the agenda and influence of external stakeholders. Both the long-term support and a clear role of the Alliance are required.

Terms of Reference Item 6 – The need for further strategies to reduce the incidence of injury and fatality on Victorian farms.

10. The following strategy is proposed, with its aim to engage all stakeholders and to, most importantly, engage all farmers. Further, the following approach will go a long way towards streamlining effective interventions, is likely to be more resource-efficient, and is more likely to support a broad range of stakeholder views.
11. Distinguish between farming practices, rather than focusing on commodity specific initiatives. The Health and Safety Executive (HSE)¹ in the United Kingdom adopts the approach whereby farms are divided into 4 categories so that safety strategies can best be adapted to issues relevant to varying farm practices. Thus:
 - a. Category A – Large national farming, (and forestry and fishing) companies employing 20 or more.
 - b. Category B – Farms employing up to 20 employees, full time or part time.
 - c. Category C – Family run farms
 - d. Category D – Other service providers, such as machinery dealers, suppliers, contractors, auctioneers and consultants.
12. By distinguishing these farms or enterprises on the size of farms (by the number of employees) and farming practices, specific strategies can be more effective by appropriately targeting each farm's peculiar work practices. Utilise a broad range of *injury prevention strategies* that target each of the above categories. These *injury prevention strategies* are inclusive of:
 - a. Compliance

¹ Health and Safety Executive. HSC: Strategic Plan 2001-2004.
www.hse.gov.uk/aboutus/plans/hscplans/plan0104-05.htm

- b. Continuous improvement
- c. Knowledge
- d. Skills
- e. Support

13. The above 5 *injury prevention strategies* should be weighted appropriately to each of the 4 farm categories. For example:

- a. Category A – Audit all Category A enterprises to ensure legislative compliance. Ensure a greater focus on compliance, rather than support.
- b. Category B – Initiate blitz inspections at Category B workplaces, such as during seasonally busy times (for example fruit picking), where employees may be at greater health and safety risk. Blitz inspections can also support compliance of new regulations, such as Falls Prevention. Support this Category through voluntary self-assessment and training, particularly promoting (and subsidising) the well-regarded Managing Farm Safety training, as revised by the Victorian Farm Safety Training Centre (VFSTC) in Ballarat.
- c. Category C – Family-run farms should be subject to less targeted WorkSafe inspections, with greater reliance on training (VFSTC), information (social marketing), voluntary self-assessments and most of all SUPPORT. Farm safety information, rather than compliance is more likely to engage this Category. Those within this Category will also be open to safety initiatives that are often attributed to lifestyle, such a child safety on farms and recreational safety strategies. This Category should be the primary focus of the Victorian Farmsafe Alliance initiatives, one that supports Farm Safety Action Groups through a health promotion model rather than one targeted by an OH&S approach.
- d. Category D – Other service providers need to be targeted. For example, auditing of suppliers (self funded) and ensuring the inspectorate enforces the duties under the OHS Act to suppliers of farm machinery, plant and chemicals.

14. Farm workers in the age group between 16 and 45 are more likely to suffer work-related injuries. Fatalities on farms are mainly correlated to children under the age of 5 and farmers over the age of 55 years (MUARC data). By implementing a targeted approach across the 4 categories (point 5), it is more likely that cost-effective interventions will hit their target. For example, by focusing on compliance for category A and B farms, you are likely to protect workers who are mostly subject to injury

(being in the 16-45 age group). By driving a public awareness campaign and providing support processes to those in Category C farms, it is most likely that these cohorts (children and older farmers who are mostly connected with family run farms) will be engaged by farm fatality prevention strategies.

15. Adopting a targeted model, as suggested in Points 10-13 of this submission, is more likely to lead to a balanced and cost-effective approach, as farms with more employees (Category A and B farms) will be targeted by compliance, whereas family farms will be targeted through support, information and advice. This model is likely to be better accepted by unions and association/s and possibly meet the needs of political parties. Further, taking a compliance approach with category A and B farms will concentrate limited WorkSafe resources to protecting employees and lead to reducing the cost of WorkCover claims.
16. A 'black spot' approach applied to each to the 4 categories (point 11) may prove cost-effective. For example, it appears from the injury/fatality data that All Terrain Vehicles (ATV) injuries/fatalities are mainly linked to Category C (Family run farms). Therefore, it is appropriate to initiate a targeted approach to specifically address ATV risks with this Category and to those in Category D (suppliers).
17. The role of WorkSafe Victoria's strategy on farm safety should be reviewed, with the recommended model adopted, as described in Points 10-13 of this submission. Ensure that WorkSafe Victoria takes a neutral view in respect to farm safety, rather than one of servicing 'the squeaky wheel' (Refer to point 7).
18. WorkSafe inspectors require specific farm safety training to ensure effective and appropriate OHS compliance by becoming more credible to its clients.
19. There are too few resources made available to farm safety in Victoria, considering the size of the problem. Farm safety needs appropriate (much greater) resourcing. Consider the resources provided to farm safety in other countries such as the UK, the USA and Canada.
20. It is worth reviewing the role and positioning of the Victorian Farmsafe Alliance (refer to point 9). There is benefit for the Alliance to be positioned within a neutral venue. A neutral physical location will dissipate the current 'ownership' barrier, allowing an opening for all stakeholders to become active in the role and initiatives of the Alliance.

As an extremely important stakeholder, the Farmsafe Alliance can maintain links to the Victorian Farmers Federation (VFF) through Farmsafe Victoria, which is positioned within the VFF and has a direct association with Farmsafe Australia.

21. Victoria should not consider operating a farm safety strategy in isolation. Victoria should ensure a closer tie with Farmsafe Australia and the Australian Centre for Agricultural Health and Safety in order to lever both Commonwealth and State government support.
22. Continue to endorse the agreed national approach to farm safety by supporting the Managing Farm Safety training (through the Victorian Farm Safety Training Centre), but targeted to Category B and C farms (refer to point 11).

23. Summary

24. There is, at present, too much influence by stakeholders' 'agendas' within farm safety programs and government interventions. We must address the 'real' health and safety risks on farms, as we know them, with targeted, effective and measured interventions. A balance is required between ensuring stakeholder engagement (acknowledging and managing their needs) with targeting risk prevention strategies, based on pure merit (facts). The strategy proposed in this submission (points 10-13) present a way forward.
25. Finally, funding of farm safety programs must, above all, be adequate and accountable to the injury data and to the cost/effectiveness of interventions by ensuring that appropriate programs are properly evaluated. Without effective farm safety program evaluation, we will continue to 'best-guess' solutions to a problem that is driven by many views.

David Rich