

10 June 2025

Resources Safety & Health Queensland
GPO Box 1321
Brisbane Qld 4001
Via email: psychosocial@rshq.qld.gov.au

Dear Resources Safety & Health Queensland,

ATTN: RSHQ 2025 psychosocial hazards discussion paper

Thank you for the opportunity to review the April 2025 discussion paper, [Legislative options to clarify obligations to manage psychosocial hazards in Queensland's resources industry](#). We appreciate the opportunity to understand further details on the nature of the modest legislative amendments which might be enacted as a future decision from the Queensland Government. We apologise that this submission is late, and thank you for being lenient with the deadline.

As you know, Australian Energy Producers is the peak national body of the explorers, developers, and producers of essential energy – oil, gas, and lower-emission fuels. We represent the businesses that are ensuring energy security and delivering substantial economic benefits to Queensland, while helping to deliver a cleaner energy future.

Australian Energy Producers **supports** the general intent of the changes to improve safety outcomes for Queensland's petroleum and gas workforce. More specifically, Australian Energy Producers supports the options in the discussion paper that have been identified for the petroleum and gas (P&G) legislation to:

- define injury and illness as including psychological injury and illness (option 1, page 14);
- define health as both physical and psychological (option 2, page 14);
- clarify obligations for the safety management system to provide for the management of psychosocial risks (option 1, page 17);
- define psychosocial hazards and psychosocial risks within Queensland's resources safety and health legislation and a requirement to consult with workers in the development of a safety management system, (option 1, page 18);
- specify factors to consider when implementing psychosocial risk controls (option 2, page 22); and
- require periodic reporting of exposure to traumatic events, bullying and harassment (including sexual harassment), (option 3, page 29);

We have not offered a view on the questions posed for mines and quarries such as option 1 page 30, but we understand the rationale presented in that section of the discussion paper.

Brisbane Office

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Australian Energy Producers Limited

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It is critical to the success of these regulatory changes that they protect the identity and confidentiality of witnesses or affected persons involved in high potential incidents related to psychosocial hazards. Australian Energy Producers consider that RSHQ are appropriately sensitive to the need for privacy and discretion in meeting reporting obligations related to psychological health or psychosocial incidents, such as sexual harassment or bullying.

In contemplating these legislative changes, AEP supports the need for RSHQ to have appropriate resources and expertise to manage and analyse this sensitive data.

Thank you again for the chance to provide a submission on the discussion paper. None of the content in our submission is confidential and you are welcome to publish it on your website.

Yours sincerely,



Keld Knudsen

General Manager States & Territories, and Queensland Director