



14 June 2018

The Hon. Bruce Lander QC
Independent Commissioner Against Corruption

Dear Commissioner Lander,

We write in reference to your public statement issued on May 22, 2018.

The Australian Amusement Leisure and Recreation Association Inc (AALARA) was established in 1994 and is the peak national body representing the amusement, leisure and recreation industry of Australia. AALARA was formed to promote, develop and safeguard the interests of its members particularly around safety, operations and management.

We represent a diverse collection of members across the aquatics, events and festivals, go karting, family entertainment centres, theme parks and outdoor attractions, manufacturers and services and transportable amusement rides.

We are being told by our members that they are not receiving a nationally consistent approach to compliance and enforcement. Our members report that onerous and unstructured inspection processes were extending for days on individual rides at the 2015 Royal Adelaide Show. Our members have advised that field audit reports were not provided at the time of inspection and only issued after the conclusion of the 2015 Royal Adelaide Show.

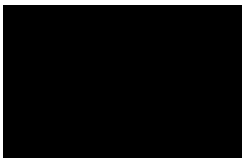
While the industry and our member's welcome inspection, we do so when it improves safety outcomes and the principles that underpin all work health and safety compliance and enforcements activities are upheld. Specifically we feel that SafeWork SA is;

1. Not achieving consistency with regard to amusement device inspection and working to push through significant amendments to the National Audit Tool for Amusement Devices. This document was welcomed by the industry in advance of the harmonised work health and safety laws and has served and continues to serve the overwhelming majority of stakeholders well.



2. Not achieving constructiveness. As an industry we expected support, advice and guidance arising from the above mentioned accident. We have received no advice or safety alerts.
3. Not achieving transparency or accountability. We are advised of an incident in February 2016 where an inspector issued a prohibition notice to an amusement device based on an anonymous report of a loud noise and without consultation with the ride operator. We believe the report was made by a competitor and fail to see how the inspector formed a reasonable belief that the activity involved a serious risk to the health and safety of a person. AALARA asks that future field audits are added to amusement device log books at the time of inspection in the interest of transparency and accountability.
4. Not achieving proportionality. Again the inspection process at the 2015 Royal Adelaide Show was reported as excessive, unstructured and extended for days on individual rides by inspectors unfamiliar with the plant.

Kind Regards,



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AALARA President