

PRACTICE DIRECTION NUMBER 2 OF 2023

INDUSTRIAL COURT OF QUEENSLAND QUEENSLAND INDUSTRIAL RELATIONS COMMISSION INDUSTRIAL REGISTRAR

WRITTEN SUBMISSIONS

Application

1. This Practice Direction shall apply to all proceedings in respect of which written submissions have been ordered to be filed.

Commencement

2. This Practice Direction shall come into force on 5 April 2023.

Definitions

3. In this Practice Direction:

hyperlink—means an icon, graphic or text that links to another file or object.

reported case—means a written decision or order of a court or tribunal.

Format and content of written submissions

4. All written submissions should carry the title and file number of the proceedings and indicate on whose behalf they are filed.
5. Written submissions should be dated and if settled by counsel, counsel's name should appear at the foot thereof.
6. Written submissions should be logically arranged with appropriate headings and should be a concise summary of the submissions to be developed in oral argument. They must not contain irrelevant, immaterial or scandalous matter. They should refer to all relevant authorities to be relied upon.
7. Written submissions should be presented in the following format:
 - (a) A4 size page printed on one side;
 - (b) font size 12, Times New Roman;
 - (c) 1.5 line spacing;
 - (d) margins of 2.5cm at each side and 2.5cm at top and bottom; and

- (e) save with leave of the Court, Commission or Industrial Registrar, or unless otherwise directed by the Court, Commission or Industrial Registrar, written submissions must not exceed 10 pages.
8. Written submissions should follow the following template:
- (a) Introduction (which should not exceed two pages) summarising the factual background;
 - (b) the principal issues in the case;
 - (c) the submissions pertinent to those issues; and
 - (d) Conclusion and an indication of the orders to be sought.
9. Written submissions should identify the legal principles relevant to the proceedings as contended and/or the evidence to be relied upon. They should be focused on those matters. Generalised submissions are not permitted.

Chronology of relevant facts

10. The applicant/appellant should include a full chronology (if relevant) of all relevant facts and of the procedural history of the proceedings (including filing dates of key statement of facts and contentions or submissions) as an appendix to the submissions. The respondent should indicate in its submissions if the chronology is agreed. Where it is not agreed, the respondent should produce a chronology clearly identifying the points of difference, in bold type.

Filing of written submissions

11. An electronic copy of written submissions shall be sent by email in Word document format, addressed to qirc.registry@qirc.qld.gov.au. If the document is over 30 pages in length, a hard copy must be provided in accordance with Practice Direction Number 3 of 2021.
12. The electronic copy of written submissions **must not** contain a hyperlink.
13. If a person wishes to file electronic copies of reported cases to which they refer to in written submissions that have been filed, the reported cases can be included in an electronic file, filed separately with the electronic written submissions. Such an electronic file containing reported cases must:
- (a) include a contents page of the reported cases, with the citations of the reported cases in the form required by Practice Direction Number 6 of 2021; and
 - (b) include an electronic version of the authorised report of the reported cases or, at least, an electronic version of the medium neutral source of reported cases.

14. Hard copies of reported cases, to which a party refers to in written submissions, will not be accepted for filing but may be handed up to the presiding Member or Industrial Registrar at the hearing.
15. The title of the email enclosing submissions should appear in the following format:
 - (a) matter number and title;
 - (b) date of hearing; and
 - (c) the party on whose behalf the submissions are being filed.

P. Davis
President
5 April 2023