

QUEENSLAND INDUSTRIAL RELATIONS COMMISSION
Industrial Relations Act 2016 - s 458

APPLICATION FOR A DECLARATION OF GENERAL RULING
Re: STATE WAGE CASE—2026 B/2026/59, B/2026/60

OUTLINE OF SUBMISSIONS IN REPLY
TOGETHER QUEENSLAND, INDUSTRIAL UNION OF EMPLOYEES

Synopsis

1. The fundamental question to be answered by the commission is whether the prevailing economic conditions in Queensland are meaningfully different from the national conditions. The answer to that question is that a forensic analysis of the economic data does not disclose a meaningful difference. Nothing in the materials filed by the State displaces that answer.
2. That being the case, there is no reason for the Full Bench to depart from the outcome of the *Annual Wage Review 2026* [2026] FWCFB 3500.

A fair and just increase

3. The State and Together are aligned in the desire to see a fair and just increase in the Queensland minimum wage and award minimum wages.¹ The State does not give a value to that increase and does not gainsay Together's submission that the increase should be 4.75%. The LGAQ says that the increase should be not more than 4.75%.
4. No party offers a compelling reason to depart from the value of 4.75%.

The evidence filed by the State

5. The State relies on affidavits of Mr Bonaventura, a Deputy Under-Treasurer, and Mr Donovan, the Executive Director of Industrial Relations at the Office of Industrial Relations.
6. Mr Bonaventura's evidence is focussed on the prevailing economic conditions and forecasting in Queensland. He gives narrative evidence which is consistent with the parties' statement of agreed facts and offers his opinions about forecast growth. Despite some differences between the prevailing economic conditions in Queensland and Nationally, Mr Bonaventura's opinion is that economic growth and inflation in Queensland are consistent with the national forecasts.²

¹ State of Queensland Outline of Submissions filed 31 July 2026. The State refers to 'fair and reasonable' and, although that is not what the act requires, it is sufficiently synonymous with 'fair and just.'

² Affidavit of Mr Bonaventura affirmed 31 July 2026, paragraphs 7.5 and 7.9.

7. In part 6 of his affidavit, Mr Bonaventura gives evidence of the impact of the State Wage Case on the State budget and public sector departments and evidence about the State's credit rating. That evidence is not relevant to the task before the Full Bench, which requires the commission to have regard to the matters in s 142(2) of the *Industrial Relation Act 2016* (Qld).
8. Mr Donovan's evidence speaks to the industrial relations framework in Queensland and how it compares to other jurisdictions. Mr Donovan gives evidence about low paid workers in Queensland at paragraph 39. Mr Thomas, an Assistant Branch Secretary employed by Together, explains why Mr Donovan's evidence about low paid workers, and the State's submissions³ on that topic are incorrect. Mr Thomas gives evidence about the AO2 and OO2 levels and how employees at those levels in fact paid below the ABS Employee Earnings and Hours (EEH) level measure of \$1,234.67 per week.⁴ Those values are important in understanding basis for the low-paid benchmark in adopted by the Expert Panel.⁵
9. Mr Thomas also gives evidence about the gender composition of employees employed at AO2 and OO2 levels: women are over-represented at those levels (just as they are over-represented across every classification level.⁶
10. Ultimately, the matters put before the commission by the State are the same as they have been since at least 2022.⁷ Never have those matters been held by the commission to be of sufficient forensic weight to displace the analysis of the Full Bench of the Fair Work Commission in the relevant year. Those matters do not displace that analysis this year, either.

Conclusion

11. The matters raised by the State and the LGAQ do not alter the outcome of the forensic exercise that it is necessary to undertake in a State Wage Case. The relief sought by Together should be granted.

Hamish Clift

Counsel for Together

14 August 2026

³ State of Queensland Outline of Submissions filed 31 July 2026, paragraphs 39 and 61 to 63.

⁴ Affidavit of Mr Michael Thomas affirmed 14 August 2026, paragraphs 4 to 22.

⁵ *Annual Wage Review 2026* [2026] FWCFCB 3500 at [84]

⁶ Affidavit of Mr Thomas, paragraphs 23 and 24.

⁷ *Declaration of General Ruling (State Wage Case 2022)* [2022] QIRC 340; *Declaration of General Ruling (State Wage Case 2023) No 3* [2024] QIRC 111; *Declaration of General Ruling (State Wage Case 2024)* [2024] QIRC 244; *Declaration of General Ruling (State Wage Case 2025)* [2025] QIRC 229.