



Form 20 – Affidavit



Industrial Relations Act 2016, s 989
Industrial Relations (Tribunals) Rules 2011, r 52, r 53, r 55

Information

- This form is to be used to prepare an Affidavit.
- Please read this form carefully and complete all relevant sections. Information that is missing or non-compliant with the relevant section of an Act or the Rules may result in the non-acceptance of your form.
- Documents which are longer than 30 pages in length must be provided to the Industrial Registry in hard copy before it will be accepted for filing.
- For further information please refer to the website www.qirc.qld.gov.au or contact the Industrial Registry on 1300 592 987 or via email at qirc.registry@qirc.qld.gov.au.

Instructions

- Affidavits must comply with the formal requirements for documents in accordance with rules 50 to 57 of the *Industrial Relations (Tribunals) Rules 2011*.
- The affidavit must set out the facts divided into consecutively numbered paragraphs. Each paragraph should be confined to a distinct part of the subject matter.
- This affidavit must be sworn or affirmed before a person authorised by law to witness the swearing of affidavits (e.g. Justice of the Peace, Commissioner for Declarations, Lawyer).
- Each page must be signed by the deponent (person making the affidavit) and the witness (person taking the affidavit).
- **Attach extra page(s) if you need more space, ensuring that Part 5 containing the signature is always on the last page of the form and that each additional page is signed at the bottom of the page by the deponent and witness.**
- Any handwritten alteration to the affidavit must be initialled by the deponent and witness.
- If this affidavit contains exhibits (document mentioned in the affidavit and used with the affidavit) you will need to complete a **Form 21 - Certificate of Exhibit to Affidavit** for each exhibit (which is also to be signed and witnessed).
- If the affidavit is sworn by a person incapable of reading the affidavit or physically incapable of signing it, the witness must complete the Certificate at Part 6.
- If required by the Court, Commission or Registrar, the deponent must appear to give evidence or for cross-examination.
- The Court, Commission or Registrar may remove or strike out any material contained within the affidavit deemed to be a scandalous or oppressive matter.

Signed: _____
[Signature of the deponent/substitute signatory]

Taken by: _____
[Signature of witness]

Justice of the Peace/Commissioner for Declarations/Lawyer

1. Matter details

Applicant:	Queensland Council of Unions
v	
Respondent:	State of Queensland (Office of Industrial Relations)

If there are more than two parties to the application, please complete a **Form 1 – Parties list** and file with this form.

This affidavit is filed for the:	<input type="checkbox"/> Applicant/Appellant	<input checked="" type="checkbox"/> Respondent (or as the case may be)
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2. Contact details of party filing this affidavit

Title [please select]:	<input type="checkbox"/> Mr	<input type="checkbox"/> Mrs	<input type="checkbox"/> Ms	<input type="checkbox"/> Miss	<input type="checkbox"/> Mx	<input type="checkbox"/> Other: _____
Name of Party:	State of Queensland (Office of Industrial Relations)					
Name of contact person: [if party is an organisation]	Shane Donovan					
Postal/Service address:	Level 11, 1 William Street					
	Suburb/Town Brisbane				Postcode 4000	
Phone number:		Mobile number:				
Email address:	Shane.Donovan@oir.qld.gov.au					

3. Deponent's details (person making the affidavit)

Title [please select]:	<input type="checkbox"/> Mr	<input type="checkbox"/> Mrs	<input checked="" type="checkbox"/> Ms	<input type="checkbox"/> Miss	<input type="checkbox"/> Mx	<input type="checkbox"/> Other: _____
Deponent's Name:	Katrina Copland					
Postal/Service address*:	Level 11, 1 William Street					
	Suburb/Town Brisbane				Postcode 4000	

* The deponent does not have to give a residential address if they are concerned about their safety. They may give another address at which they are satisfied they will receive documents e.g. a business address.

Signed: _____
[Signature of the deponent/substitute signatory]

Taken by: _____
[Signature of witness]

Justice of the Peace/Commissioner for Declarations/Lawyer

4. Evidence

Attach extra pages if you need more space ensuring that Part 5 containing the signature is always on the last page of the form and that each additional page is signed at the bottom of the page by the deponent and witness.

Affidavit

I, Katrina Copland, of Office of Industrial Relations
[insert full name of deponent] [insert residential or business address of deponent*]

state on oath: **OR** do solemnly and sincerely affirm and declare, that:

Insert matters to be sworn or affirmed in numbered paragraphs.

I am acting in the position of Director of the Industrial Relations Policy and Legislation unit within the Office of Industrial Relations of the State of Queensland.

I confirm I have caused to be created by Queensland Treasury the economic evidence put forth in Exhibit marked A of this Affidavit.

Signed: _____
[Signature of the deponent/substitute signatory]

Taken by: _____
[Signature of witness]
Justice of the Peace/~~Commissioner for Declarations~~/Lawyer

5. Signature

The contents of this affidavit are true and correct. Where the contents of this affidavit are based on information and belief, the contents are true to the best of my knowledge and I have stated the source of that information and the grounds for the belief and, if contained in a document, I have attached that document to this affidavit.

I understand that it is a criminal offence to provide a false matter in an affidavit, for example, the offence of perjury under section 123 of the Criminal Code.

I state that: [Deponent to complete – *only tick if applicable* – leave blank if not applicable]:


- This affidavit was made in the form of an electronic document
- I electronically signed this affidavit
- This affidavit was made, signed and witnessed under Part 6A (Audio visual link) of the *Oaths Act 1867*.

SWORN/AFFIRMED BY:

Signature of person making the affidavit	
Full name of deponent:	KATRINA COPLAND
Signature of deponent:	
Sworn/Affirmed at [place]:	BRISBANE
Date:	19 August 2024

Alternative signature panel if substitute signatory signs	
Complete this section <u>only</u> if the affidavit was signed by a substitute signatory (a person directed to sign the affidavit on behalf of the deponent) <i>Signed for and at the direction of the deponent by:</i>	
Full name of substitute signatory:	
Signature of substitute signatory:	
Sworn/Affirmed at [place]:	
Date:	

BEFORE ME:

Witness details	
Full name of witness:	Jasmine Settle
Signature and type of witness:	(JP Qual.) 
	<input checked="" type="checkbox"/> Justice of the Peace <input type="checkbox"/> Commissioner for Declarations <input type="checkbox"/> Lawyer
Date:	19/08/2024
Insert name of law practice/place of employment:	BRISBANE

6. Certificate (pursuant to rule 55 of the *Industrial Relations (Tribunals) Rules 2011*):

WITNESS to complete [only tick if applicable]

If deponent is incapable of reading or physically signing the affidavit

- I certify that this affidavit was read in the presence of the deponent who seemed to understand it, and signified that they made the affidavit.
- I certify that this affidavit was read in the presence of the deponent who seemed to understand it, and signified that they made the affidavit, but was physically incapable of signing it.
- A substitute signatory signed for and at the direction of the deponent.

7. For Special Witnesses (see s 12 of the *Oaths Act 1867*)

SPECIAL WITNESS to complete [only tick if applicable]

For special witnesses only:

- I am a special witness under the *Oaths Act 1867* (see s 12 of the *Oaths Act 1867*).
- This affidavit was made in the form of an electronic document.
- I electronically signed this affidavit.
- This affidavit was made, signed and witnessed under Part 6A (Audio visual link) of the *Oaths Act 1867* - I understand the requirements for witnessing a document by audio visual link and have complied with those requirements.

Signed: _____
[Signature of the deponent/substitute signatory]

Taken by: _____
[Signature of witness]
Justice of the Peace/~~Commissioner for Declarations~~/Lawyer



Form 21 – Certificate of Exhibit to Affidavit

Industrial Relations Act 2016, s 989
Industrial Relations (Tribunals) Rules 2011, r 53

Information

- This form is to be used when attaching exhibits to an affidavit. Exhibits are documents mentioned in the affidavit and used with the affidavit. Attach one Certificate per exhibit.
- Please read this form carefully and complete all relevant sections. Information that is missing or non-compliant with the relevant section of an Act or the Rules may result in the non-acceptance of your form.
- For further information please refer to the website www.qirc.qld.gov.au or contact the Industrial Registry on 1300 592 987 or via email at qirc.registry@qirc.qld.gov.au.

Matter details

Applicant:	Queensland Council of Unions
v	
Respondent:	State of Queensland (Office of Industrial Relations)

Exhibit details

Name of document:	Economic evidence prepared by Queensland Treasury
Marked:	A
Mentioned in the affidavit of:	Katrina Copland

Signature

Full name of deponent/ substitute signatory:	Katrina Copland	
Signature of deponent/ substitute signatory:		
Full name of witness:	Jasmine Settle	
Signature and type of witness:	(JP Qual.)	
	<input checked="" type="checkbox"/> Justice of the Peace <input type="checkbox"/> Commissioner for Declarations <input type="checkbox"/> Lawyer	
Sworn/Affirmed at [place]:	1 William Street Brisbane 4000	
Date:	19/08/2024	



Appendix A – Economic Evidence prepared by Queensland Treasury

Current Economic Conditions and Outlook¹

1. The Australian and Queensland economic forecasts outlined are the latest available, current as of the RBA's May 2024 Statement on Monetary Policy (*SoMP*) and Queensland 2024-25 Budget.²

National Economy

2. Like many other advanced economies, the Australian economy has slowed considerably over the course of 2023 and into early-2024. Annual growth in real GDP slowed to 1.1% in March quarter 2024, down from 2.5% at the end of 2022.
3. While real GDP growth is expected to have troughed in the March quarter, growth is anticipated to remain subdued throughout the rest of 2024, with private consumption and investment impacted by higher interest rates and elevated inflation. The RBA expect annual growth in real GDP to be just 1.6% over 2024, before strengthening to 2.3% over 2025.
4. Despite strong population growth, household consumption rose just 1.3% over the year to March quarter 2024. The RBA notes that household consumption is expected to pick-up gradually as the continued recovery in real incomes supports a pick-up in household spending. Household consumption is expected to rise 1.3% over 2024, before strengthening to growth of 2.8% over 2025.
5. In the dwelling sector, investment has been weak despite very strong house price growth and population growth. Dwelling investment fell 3.4% over the year to March quarter 2024, with the sector continuing to be impacted by capacity constraints and high construction costs.
6. Looking ahead, the RBA expect ongoing capacity constraints and poor housing affordability to continue hampering dwelling investment in the near term. Having fallen 3.1% over 2023, the RBA forecasts real dwelling investment will grow just 0.2% over 2024 and 0.9% over 2025.
7. The national labour market has been historically tight, with the unemployment rate under 4% throughout 2023. The tight labour market resulted in annual wages growth rising to 4.2% in December quarter 2023, the strongest result since 2009. However, conditions in the labour market appear to be easing, with employment growth slowing, the

¹ Forecasts are taken from the RBA's May 2024 *Statement on Monetary Policy*.

² Queensland Treasury, Queensland State Budget, released in June 2024.

unemployment rate rising above 4% in early-2024, and annual wages growth slowing marginally to 4.1% in March quarter 2024.

8. Despite weak economic growth, the RBA forecasts the unemployment rate to rise only gradually over 2024 and 2025, reaching 4.2% in December quarter 2024 and 4.3% in December quarter 2025. Meanwhile, annual wages growth is expected to have peaked in December quarter 2023, moderating to 3.8% over 2024 and to 3.4% over 2025.
9. The RBA identified several key risks to the national economic outlook, including the potential for inflation to not slow as quickly as expected. If this were to occur, it would lead to a longer period of restrictive monetary policy and softer economic growth than anticipated. The RBA identified further global supply shocks and the potential for services inflation to be more persistent than anticipated as two potential drivers of higher-than-expected headline inflation.
10. Annual headline consumer price inflation peaked at the end of 2022 at 7.8% before moderating over 2023, declining to 3.6% in March 2024. While the ABS Monthly CPI Indicator has shown annual inflation marginally accelerating in June quarter 2024, the RBA forecasts inflation to continue moderating over the next two years to 2.8% by the end of 2025 - just within RBA's target 2-3% target band.

Queensland Economy

11. Following growth of 2.3% in 2022–23, Queensland's overall economic growth is forecast to strengthen to 3% in both 2023–24 and 2024–25, supported by recent and ongoing population growth and a rebound in the overseas trade sector.
12. Household budgets in Queensland continue to be constrained by the recent substantial increases in mortgage rates and other cost-of-living pressures, which has resulted in slower consumption growth in 2023–24. However, growth in household consumption is expected to recover from forecast growth of 1% in 2023-24, strengthening to 2% in 2024-25 and to 2½% in 2025–26.
13. In the dwelling sector, higher construction costs and ongoing capacity constraints have limited overall residential construction activity, particularly renovation activity. However, the large amount of work in the pipeline is supporting new and used dwelling investment. Following a decline of 5.5% in 2022–23, dwelling investment is forecast to fall by 2½% in 2023–24. This decline primarily reflects a decline in alterations and additions and detached dwelling investment. Dwelling investment is then forecast to rebound to 2¼% growth in 2024–25 and grow by a further ¼% in 2025–26, supported by lower interest rates and the easing of supply constraints.

14. Growth in business investment is expected to be modest over the next two years as interest rates, elevated construction costs and softening commodity prices impact investment intentions. Business investment is forecast to rise 3% in 2023-24, before rising a further 1¾% in 2024-25 and 2½% in 2025-26.
15. Queensland's overseas trade sector is forecast to be a substantial contributor to overall GSP growth in 2023-24, after detracting from real economic growth for four consecutive years. This improved trade performance is due to increased export volumes of coal, LNG, metals, and beef, as well as the continued recovery of services exports.
16. Queensland continues to enjoy exceptionally strong labour market conditions, building on employment growth of 5.1% in 2021-22, the strongest in 17 years, and the further strong jobs growth of 3.7% recorded in 2022-23. With ongoing solid demand for labour, employment growth is expected to be 2¾% in 2023-24 before moderating to 1½% in 2024-25 and 1% in 2025-26.
17. Queensland's unemployment rate averaged 3.7% in 2022-23, its lowest year-average unemployment rate since ABS monthly data began in 1978. The unemployment rate is expected to increase slightly to average 4¼% in 2023-24 and then gradually move towards a rate more consistent with stable inflation, reaching 4½% in 2024-25 and then 4¾% in 2025-26 and 2026-27.
18. Similar to national trends, inflationary pressures in Brisbane eased significantly during 2023, with the annual rate of headline inflation moderating from a 30-year high of 7.9% in September quarter 2022 to 3.4% in March quarter 2024. This has largely been due to a marked slowing in goods inflation, whereas services inflation has been more persistent.
19. In year-average terms, inflation in Brisbane is forecast to ease from 7.3% in 2022-23 to 4% in 2023-24. Services inflation is expected to moderate going forward, while the Queensland Government's cost-of-living measures, supported by the Australian Government's additional electricity and rent support, is expected to detract around 1¼ percentage points from CPI growth in 2024-25. This results in forecast annual CPI growth falling to 2% in 2024-25.

Government fiscal position and strategy

20. In the 2024-25 Budget, Queensland's economic growth is forecast to strengthen from 2.3% to 3% in both 2023-24 and 2024-25. This growth will be driven by an expected rebound in exports as capacity constraints unwind, while public final demand is also forecast to contribute strongly to growth in 2023-24.

21. Queensland's Gross State Product has exceeded half a trillion dollars. A deficit of \$2.2 billion was forecast for the current 2023-24 financial year, however the government now expects to return an operating surplus of \$564 million.
22. The expected surplus was managed through improved revenue, including royalties and taxes. For 2024-25, a deficit of \$2.6 billion is forecasted as cost-of-living relief is provided to Queenslanders.
23. To address short-term pressures, cost-of-living measures totalling \$3.739 billion will be provided in 2024-25.
24. The \$107.262 billion Big Build program is a key infrastructure investment which will be delivered over the next four years.
25. In 2024-25, growth in taxation revenue will be offset by an expected decline in royalties, and by expense measures including cost-of-living relief measures and increased investments in housing, health and community safety. The deficit is forecast to reduce to \$515 million in 2025-26 and a targeted \$3 billion savings plan, over 4 years, to 2027-28, will be applied to ensure returns to surplus from 2026-27.