One of the outstanding gaps exists under the equal pay for work of equal value section. Looking specifically at (3) as reproduced below you will note there is no consideration of the risk involved in any occupation but merely on the “skill, effort and responsibility required” with a vague and undefined reference to “the working conditions”. One could argue, on the basis of this extract, that a secretary should be paid more than a logger by virtue of the criteria referenced and yet a logger has far more likelihood of serious injury or death but that is not considered. It is, in my opinion, unfair to ignore the risk attached with particular occupations when making equal pay and equal value assessments. Men are far more likely to suffer injury and death in their occupations than are women and to ignore this is, I believe, unfair.

**Equal pay for work of equal value**

(3) In assessing the value of the work performed the criterion to be applied is the composite of the skill, effort, and responsibility required and the working conditions.

Dr. Gerry Ewert