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Consultation on a proposed workplace exposure standard for diesel particulate matter

Thank you for the opportunity to provide feedback on the consultation on a proposed workplace exposure standard for diesel particulate matter. The Australian Workers' Union (AWU) represents around 72,000 workers in a diverse range of industries: mining, energy, manufacturing, civil construction, agriculture, along with many others. The AWU supports the feedback and paper provided by the Australian Council of Trade Unions.

Diesel exhaust emissions (DEE) are omnipresent pollutants in various industries and have been linked to a wide range of health complications, impacting both the physical well-being and performance of workers. DEE are a complex mixture of particulate and gaseous components, including carbon particles and over 40 known carcinogenic substances such as benzene, formaldehyde, and polycyclic aromatic hydrocarbons.

DEE are notably prevalent in a myriad of workplaces, with a broad scope that extends across industries as diverse as mining and transportation, and even to roles such as car park attendants and traffic controllers exposed to road traffic. Similarly, retail and repair workers, particularly those dealing with diesel mechanics, are commonly exposed. Also, those involved in the manufacturing of machinery, extraction of minerals and resources, quarrying, and asphalt production experience frequent exposure to DEE. Given the vast range of industries and roles affected, it's evident that DEE poses a considerable occupational health risk that necessitates further attention and action to minimize exposure.

The AWU supports of the establishment of a Workplace Exposure Standard (WES) specifically targeting elemental carbon, a crucial constituent of DEE. Recognising the absence of a DEE-specific WES, the AWU proposes a balanced, incremental reduction strategy to ultimately reach a standard based on health considerations. The ACTU's

approach takes into account the current lack of regulation and proposes a realistic and well-planned transitional period that could help industries adapt while prioritizing workers' health.

In 2011, a comprehensive study led by Carey and colleagues shed light on the scale of DEE exposure among Australian workers. The researchers found that approximately 29% of male workers and 6% of female workers were occupationally exposed to DEE. These substantial percentages indicate the widespread nature of DEE exposure in Australian workplaces and underline the urgency of introducing and enforcing appropriate measures to curtail this exposure.

The potent and widespread DEE exposure in Australian workplaces underscores the necessity for adequate control measures aimed at significantly reducing exposure levels. Chronic and acute health effects stemming from DEE exposure are well-documented, and it's paramount that workers are protected from such hazards. it's important that any adopted strategies encourage a proactive stance toward managing DEE exposure. This would involve both the enforcement and adherence to guidelines designed to reduce exposure, ultimately enhancing the safety and wellbeing of workers across a range of industries.

The AWU, alongside our membership directly exposed to DEE, also has members working in Australia's fuel refineries. Our fuel refineries provide a critical sovereign capacity to make our own diesel and other fuels here in Australia. It is critical that Safe Work Australia consults with Viva and Ampol, as the two remaining domestic fuel refineries, to ensure that the impacts of any changes to standards are considered along the entire supply chain.

Yours in Unity

Paul Farrow ASSISTANT NATIONAL SECRETARY