

SUBMISSION

Consultation Regulation Impact Statement:

Managing the risks of respirable crystalline silica at work

Instructions

To complete this online submission:

- Download and save this submission document to your computer.
- Use the saved version to enter your responses under each question below. These questions are from the [Consultation Regulation Impact Statement on managing the risks of respirable crystalline silica at work](#).
- Once you have completed your submission, save it and upload it using the upload your submission link on the [Engage submission form](#).

Submissions will be accepted until **11.59 pm on 15 August 2022**.

Additional documentation

Up to three additional documents can also be uploaded when you submit your response. Relevant documents to upload could include cover letters or reports with data and evidence supporting your views.

Help

If you are experiencing difficulties making your submission online, please contact us at occhygiene@swa.gov.au.

Respondents may choose how their submission is published on the Safe Work Australia website by choosing from the following options:

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Please note the following are unlikely to be published:

- submissions containing defamatory material, and
- submissions containing views or information identifying parties involved in hearings or inquests which are currently in progress.

Your details

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1. Name or organisation



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Questionnaire

(Consultation RIS questions)

Statement of the problem (Chapter 2)

2.1 Do you agree with the identified problem? Has the entirety of the problem been identified? Please provide evidence to support your position.

I agree with the identified problem. The full extent of the risk can and should be better clarified similar to Asbestos. The consultation paper does not provide much information as to the effects of exposure and the limitations that are likely to be harm full.

2.2 Do you have further information, analysis or data that will help measure the impact of the problem identified?

No

Why is Government action needed? (Chapter 3)

3.1 Do you agree with the case for government intervention? Please provide evidence to support your position.

I agree with the case presented and agree that government intervention is required. The statistical evidence of disease and non-conformance to WHS compliance present a compelling case.

3.2 Do you agree with the objectives of government intervention? Please provide evidence to support your position.

Yes to an extent. I would like to include the public not just works are included that may be affected as a result of works being carried out.

What policy options are being considered? (Chapter 4)

4.1 Do these options address the problem? Please provide evidence to support your position.

I believe the options of 5a would help improve the industry. I believe the management of Asbestos would provide a good baseline to support the position. We would also need to consider the prevalence of the material and the ongoing use to be taken into account.

4.2 Are there any other non-regulatory or regulatory options you think should be considered to address the problem?

Manufactures should also provide a safety data sheet providing information of the amount of silica in their product.

What is the likely impact of each option? (Chapter 6)

6.1 Is the cost modelling methodology appropriate to estimate the costs to industry and governments (Appendix D)? Please provide evidence to support your position.

No Comment

6.2 Are the estimates of the number of businesses covered by each of the regulatory and non-regulatory options accurate? Please provide evidence to support your position.

No Comment

6.3 Are there other factors that should be considered in the assessment of the effectiveness of each option (Section 6.5)? Please provide evidence to support your position.

No Comment

6.4 Are the cost and other estimates (including worker wage assumptions) listed in Appendix D accurate and appropriate? If not, please provide additional data to support a more accurate estimate of costs.

No Comment

6.5 Do you have further information regarding the costs to the public health system for silicosis and silica related diseases?

No Comment

Discussion of options (Chapter 7)

7.1 Which option or combination of the options presented is most likely to address the identified problem? Please provide evidence to support your position.

5A

7.2 Are there any significant barriers to implementation of the options presented? What are those barriers? Is there a cost associated with them? How could they be overcome?

Any changes generally will also have an increased cost. What we need to consider is the overall economic cost to the community. Future loss of productivity due to injured or death of a worker and lasting impact to those around them. This maybe quantified by loss productivity, increase cost to the healthcare system that can be attributed to a dollar value that is easier to quantify.

Other comment

Do you have anything further you would like to add as part of this process?

Nil.