

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

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Your details

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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.

Yes, the problem is well documented. Awareness training must be first provided to Supervisors and Management that are responsible for the manufacture and use of products containing Crystalline Silica, training then must be provided for all Employees and workers that are exposed to Silica containing material before they work with the products. Recently I have provided feedback towards the development of 4 Silica safety units of competence, the outcome is a welcomed addition to making meaningful inroads to a safer workplace in the Construction Industry.

Awareness training must capture all workers (Management, Supervisors and Workers) prior to potential exposure of Crystalline Silica materials. I would personally be happy to see this training and awareness included in the CPCCWHS1001 - Prepare to work safely in the construction industry as it seems to be the most common vehicle to capture all workers entering our industry.

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

I Lecture Bricklaying at South Regional TAFE W.A., previous 27 years as a Bricklayer and Employer of Apprentices. My training operation is based in a large purpose-built Masonry Training workshop, over the past 20 years I have implemented many procedures to reduce dust-as you can imagine placing an outside trade inside a shed creates a dusty environment. Of recent I contracted a Hygienist to survey and provide a dust report on our operations, the findings identified above acceptable levels of Crystalline Silica, so we have now purchased an industrial wet sweeper that is designed to remove all accumulated dust on a regular basis, accompanied with other measures I have managed to provide a healthy environment for training.

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.

Yes, the Government should most certainly be involved as this is a national industry health issue, we must ensure all workers in our Industry are aware and have the skill to work safely with crystalline silica materials and products.

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

Yes, The Government must ensure Management, supervisors and all workers are included in the hazard awareness and training to work with crystalline silica.

What policy options are being considered? (Chapter 4)

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

Yes, the options address the problem.

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

As I have previously stated there is an elevated respiratory risk when you conduct training of any Masonry Trade in a workshop, this operation would pose the same respiratory risk as you would expect from a manufacturing environment. I would be happy to see a focus on training environments to meet an acceptable level of dust management.

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.

Happy with the modelling cost estimates

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.

Yes

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, there is sufficient coverage to effectively implement awareness and change to Industry procedures.

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.

Cost estimates seem to be inclusive and cover worker wage assumptions.

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

Cost to the public health system will obviously be under less burden if we implement an inclusive transition to healthy work practice.

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.

All options have merit to cover different aspects of process, I don't think one option is going to cover all aspects. I agree with 7.6 combination of options to ensure cohesion in management and process.

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?

Focus to cover a broad spectrum of awareness is required, I would be happy for the following units be mandatory in Bricklaying Cert II & III Qualifications:

CPCSIL1001 Prepare to work safely with products and materials containing crystalline silica

CPCSIL2001 Use and maintain respiratory protective equipment

CPCSIL3001 Work with products and materials containing crystalline silica

I would also encourage the following unit be mandatory for Educators, Supervisors and Management in regard to the safe process and acceptable exposure levels to crystalline silica materials.

CPCSIL4001 Supervise and manage work with products and materials generating respirable crystalline silica

Other comment

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

Very happy with the progress of this very important topic, also very happy to provide any extra feedback if required.