



SA UNIONS

The United Trades and Labor Council of SA



[www.saunions.org.au](http://www.saunions.org.au)

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Consultation Regulatory Impact Statement [CRIS]– Silica SWA

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Dear SafeWork Australia,

Recent modelling by Curtin University predicts 83,000 to 103,000 cases of silicosis and 10,300 lung cancers in workers exposed to respirable crystalline silica [RCS] during 2016. This is very likely an underestimate<sup>1</sup>. The good news is that a significant reduction in those numbers can be achieved by adopting appropriate risk control measures.

SA Unions and affiliate unions have been advocating for improved health and safety regulatory framework that makes it very clear to duty holders that exposures to RCS must be eliminated or controlled. Risk control measures must not rely solely on respiratory protection.

SA Unions supports the ACTU submission to the CRIS and calls on all governments to adopt a generic regulation which covers all high-risk silica processes, a licensing system for engineered stone businesses and a planned approach to the banning of use and importation of high silica content engineered stone. Similar risk control strategies have been shown to be successful for materials containing asbestos.

SA Unions is convinced that a regulatory response is the only way to assist enterprises improve their control measures and facilitate better compliance activity by health and safety regulators.

Yours,



<sup>1</sup> Curtin Report is available here

<https://research.curtin.edu.au/news/10000-aussie-workers-set-to-develop-lung-cancer-from-silica-dust-study/?type=media>