

# 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 <u>Consultation Regulation Impact Statement on managing the
  risks of respirable crystalline silica at work.</u>
- Once you have completed your submission, save it and upload it using the upload your submission link on the <u>Engage submission form</u>.

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 <u>occhygiene@swa.gov.au</u>.

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

- submission published
- submission published anonymously
- submission not published

For further information on the publication of submissions on Engage, please refer to the <u>Safe</u> <u>Work Australia Privacy Policy</u> and the <u>Engagement HQ privacy policy</u>.

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

(Please leave blank if you wish to remain anonymous)

- 1. Name or organisation
- 2. Email used to log into Engage

### 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 definition and the evidence to support the problem definition are in line with our business' current understanding of RCS.

# 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.

Yes, we agree that government intervention is required to reduce workplace exposure to RCS and the number of cases of silicosis and silica related diseases. Lack of general awareness has been noted when dealing with contractors.

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

Yes.

#### What policy options are being considered? (Chapter 4)

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

Yes. Option 3, 5a or 5b in particular would assist our business by providing a clearer definition is regards to the Tile industry. State regulatory bodies have failed to provide clear guidelines for this the tile industry and have advised to follow the code of practice for engineered stone.

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

No.

### 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.

Yes.

6.2 Are the estimates of the number of businesses covered by each of the regulatory and nonregulatory 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.

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.

Yes.

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

No.

### **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.

Option 3 – we need to know what is classified under high-risk silica processes, this would remove some of the ambiguity currently in the tile industry. However, if not done well could be even more ambiguous. For our industry clarification is needed rather than full regulation.

# 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?

Equipment manufacturers to support dust extraction and vacuums etc are not addressing the situation to support the industry. This will lead to non-compliance due to cost and accessibility of the correct tool.

#### Other comment

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

No.