

Regarding the proposed prohibition on the use of engineered stone consultation submission:

Dear Sir or Madam,

It is my personal opinion that the material should NOT be prohibited, because:

- The material itself is not hazardous – only the dusts arising from the cutting / machining of the material.
- It is impossible to remove all sources of respirable silica from the workplace – be it mining, construction, or domestic settings. As an example you would need to also ban concrete, just in case someone decided they needed to cut it or grind it etc. Stone / concrete pavements would have to be banned for the same reason. The list goes on.
- The issue is actually that of identification and management of the hazards.
- There will also be a campaign of education required – to enable individual persons, including both workers and those responsible for setting persons to work, to identify when there is a risk of exposure to respirable silica, and how to manage it.
- Where respirable silica is identified as a hazard, it must be managed where practicable via engineered solutions proportional to the level of exposure. E.g. dust suppression using water, dust extraction and as a last resort – PPE.
- IF the hazards are identified and managed correctly, the risks of exposure to respirable silica can be managed – as it already is in many workplaces for other materials than engineered stone.
- It is also the individual workers responsibility to adhere to the management requirements and utilise all control measures. Workers need to understand the importance of ensuring that they do not expose themselves to respirable silica by failing to follow safe working procedures.

Yours,

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