

Q1. Do you support a prohibition on the use of engineered stone? Please support your response with reasons and evidence.

No. Harm is the result of unsafe work practices, not unsafe products. Banning engineered stone will not change the outcome for people who are sadly already going to develop silicosis due to poor regulation and workplace practices.

Preventing silicosis in future relies on developing safe work practices, harsh penalties and properly funding regulators to inspect workplaces to make sure the industry changes.

Q2. N/A

Q3. If no, do you support a prohibition of engineered stone that contains more than certain percentage of crystalline silica? If yes, at what percentage of crystalline silica should a prohibition be set? Please support your response with reasons and evidence.

No. If people are going to work unsafely with engineered stone, the silica content won't make much difference.

Q4 to Q7 N/A

Q7. In relation to Option 3:

The risks associated with working with engineered stone warrant a licencing scheme that covers all engineered stone, regardless of silica content. As I said above, no amount of regulation will change the situation if regulators are not properly funded to enforce it and if fines and demerits are insufficient.

Q8 to Q9 N/A

Q10. Should there be a transitional period for a prohibition on engineered stone? If so, should it apply to all options and how long should it be?

Businesses that want to continue working with engineered stone should:

1. Complete compulsory stone handling training (everyone associated with an engineered stone business).
2. Compulsory regulatory and compliance training (supervisors, managers and owners)

Q11. Do you have any evidence or data on the number of cases of the other silica-related diseases (such as lung cancer, chronic obstructive pulmonary disease, kidney disease, autoimmune disease) attributed to exposure to crystalline silica from engineered stone?

As a consumer and a taxpayer, I am concerned to see the engineered stone industry singled out of the many industries that use high-silica products. There are numerous businesses and products that contain higher amounts of silica than engineered stone. Banning engineered stone sets a dangerous precedent for government banning industries and products rather than analysing a problem and regulating it.

Q12. Do you have any additional evidence or information on the impacts of silicosis or silica-related diseases?

Silica-related diseases will not be prevented by banning engineered stone. They will be prevented by properly regulating all industries where people are exposed to silica.

I've worked in high-risk industries – mining, gas and construction - for over 20 years and have seen them gradually become safer. The change has been driven by strong regulation and cultural change.

The costs to workers who have, or will develop, silica-related disease have already been inflicted. There is no point putting businesses and the people they support into financial hardship which can be an equal burden on families, social support systems, the health system and the taxpayer.