



29/03/2023

Submission to Safe Work Australia regarding Engineered Stone

To whom it may concern,

We are a medium-sized business processing and installing Engineered Stone, Natural Stone and Porcelain for both commercial and domestic applications.

We are a relatively new business, having begun in [REDACTED] but have grown rapidly to meet the needs of the burgeoning stone industry. We have a manufacturing facility in [REDACTED] and a sales and operations office in [REDACTED]. We provide a full measuring, fabrication and installation service throughout [REDACTED].

[REDACTED] sets itself apart from many traditional stone masonry companies in that we are highly focussed on using the latest of technology. This includes electronic templating when measuring jobs which almost entirely eliminates the need to perform on-site modifications. Where the very occasional on-site modification is necessary, all of our cutting and polishing tools are equipped with water suppression and our employees are fully inducted into the use of them.

A major part of our fabrication process involves CNC automated equipment with water suppression, and any manual work is strictly performed with water suppression where applicable. We even have a washing machine in our factory for washing cleaning-cloths and other soiled fabric.

OH&S is always a primary concern in our organisation and we have always responded immediately to any risks as they come to our attention including, but not limited to dust exposure. We have a full-time OH&S Officer employed in the business and have a fully compliant OH&S system in place for all risks. We also require our staff to complete Caesarstone's Master of Stone training program.

Our company regularly invites independent industrial hygienists to monitor air quality in the workplace. Results have repeatedly showed crystalline silica to be almost undetectable in the air at the height of our manufacturing process. This shows that complete risk mitigation can be achieved without the banning of engineered stone.

Our view on the current Silicosis investigation is that crystalline silica is a significant health concern that can be managed without the banning of just one of many products containing it. Although engineered stone can have one of the highest concentrations of

crystalline silica, the industry is responding by reducing the content to be like that of many other materials such as concrete, brick, tile and natural stone*. This would make a total ban unfair unless all of these other building materials and more, were prohibited as well.

We strongly advocate for a rational, progressive approach which instigates and regulates better health and safety practices within the engineered stone industry to avoid the economic and social fallout that a total ban would create.

Yours Sincerely,



***According to Encyclopaedia Britannica 2023:**

Silicosis is one of the oldest industrial diseases, having been recognized in knife grinders and potters in the 18th century, and it remains one of the most common dust-induced respiratory diseases in the developed world.

***According to Cancer Council Australia website:**

Approximately 587,000 Australian workers were exposed to silica dust in the workplace in 2011. They also state that the occupations with the greatest exposure include:

- Miners
- Construction workers
- Farmers
- Engineers.

***According to WK Quantum Quartz:**

Currently there are 7000 to 8000 persons directly employed in the stone masonry industry in Australia. If this is accurate, there is a gap of over 500,000 workers who will still be exposed to the hazard even if engineered stone were to be banned.

Conclusion:

If engineered stone with a crystalline silica content of 40% or less is banned, the government would automatically have a moral responsibility to ban concrete, bricks, mining, quarrying, sandblasting, demolition, farming, tiling, ceramics, construction, roadmaking, metal working, manufacturing, cleaning and landscaping in order to be consistent.