



Soloman's Seal Pty Ltd, trading as

Foot's Artworks

Director Foot Young

30 March 2023

To: Safe Work Australia
Re: impending legislation on engineered stone
From: Foot Young

To Whom in May Concern,

I can see some impending legislation that I felt compelled to put some input into, as I have worked for forty years, almost exclusively with what is called engineered stone. Fortunately the engineered stone that I use is made by my own company and it contains no silica, as I use calcium carbonate as the filler with the resin. Calcium carbonate is limestone, or marble dust. It has no harmful components being a compound of calcium, carbon, and oxygen, originating from organic marine coral growth. As my sculptures must be hand polished, we only sand wet, as any dust, even smoke, anything at all except clean air, it not good for the lungs. Whatever is done with the legislation will not affect my own product, unless of course there is a blind ban on all products that one could label "engineered stone". I feel that this is an overkill, and definitely a mistake.

This is the big factor that needs to be clearly on the table. **Not all engineered stone is potentially dangerous.** If it is it must contain silica, and unfortunately some, perhaps many, of commercial makes do, as sand, as well as many other types of crushed stone, is a cheap filler, , and all concrete and masonry products, even polished concrete floors have silica. If those were banned as well our entire building system would collapse. Generally those products are not always worked with cutters, and when they are cut most self respecting workers will use a diamond saw and wet cut. They can of course be dry cut as well, blades wear out faster, but the cost of labour often cancels that factor out. Cement sheet used on walls is always cut dry that I have witnessed, and I've been shocked to see workers not even bothering with a mask, even indoors. Therein lies the core problem. It is not the material, it is the attitude of the individual that determines safe or not, and as the employer can not monitor all the workers all the time, it all comes down to a worker choosing to be safe.

It is not the silica in the product that is the problem, silica itself is not toxic. But when made into a fine dust and inhaled, the lung tissue reacts to it, causing scarring or fibrosis. It is only hazardous not when it is cut dry, but when it is inhaled. Wet cutting does not produce dust. The slurry is not airborne and is always safely disposed of, neither is it toxic to the environment unless greatly concentrated into a suffocating layer. But wet cutting isn't always possible, and to attempt that with hand tools invites electrical hazard..

The biggest threat to workers centres around slabs uses in bench tops, vanities, tiles, and wall sheets. These are relatively thin, less than 20 mm, and as most workers know, that material doesn't have to be cut wet. Wet cutting, although safer is messier, and also requires special equipment. It is commonplace, and quicker, to just "whack the piece down" with a handheld diamond blade power cutter, cut dry, as in the photo attached. The cloud of dust would not be there if it were wet cut. A mask is all it takes to keep a virus, or that dust, out of the body.

The problem is not the material, it is how it is cut that is the problem. That is what the legislation should address in my view but will it be effective, I doubt it. Everyone knows very well that the sun causes skin cancer, does that stop them from going for that nice looking tan. Can this ever be make illegal? In my view the best way to reduce silicosis is strong education coupled with sensible legislation. That has worked pretty well with smoking.

I trust that my input may be worthy of some consideration.

Best regards,

Foot Young,

Sculptor

