

# SUBMISSION

## Public consultation on the prohibition on the use of engineered stone

### 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 [public consultation on the prohibition on the use of engineered stone](#).
- Once you have completed your submission, save it and upload it using the upload your submission link on the [Engage submission form](#).

Submissions will be accepted until **11.59 pm on 2 April 2023**.

### 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 [occhygiene@swa.gov.au](mailto:occhygiene@swa.gov.au).

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 [Safe Work Australia Privacy Policy](#) and the [Engagement HQ privacy policy](#).

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

Coastline Kitchens (WA) Pty Ltd

### 2. Email used to log into Engage

[REDACTED]

## Consultation questions

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

We do not support a complete prohibition of the use of engineered stone. Coastline Kitchens is a major supplier of cabinetry to new homes in WA (appr 2500 homes per year) and 90% of these homes have engineered benchtops. This product is highly desired due it's excellent durability, functionality, and safety. There is no real alternative at this scale and a full prohibition would result in a significant issue of supply to an already stressed supply chain that is struggling to build the housing that Australians require.

If all engineered stone were to be banned, then any material containing silica that requires cutting would also need to be banned e.g., bricks, tiles, concrete, granite benchtops. That is obviously not realistic, and so it's also not fair to make a scapegoat out of engineered stone.

At Coastline Kitchens we have invested \$5m+ in ensuring we manufacture engineered benchtops safely using modern machinery such as wet cutting, waterjet, and CNC's. We encourage regular visits from Worksafe and appreciate the efforts in promoting and regulating safe working methods.

Granite benchtops is not a realistic alternative due to costs of material and production methods. Due to the fragility of the product, more hand work is required than with engineered benchtops.

If all silica-based products are banned, it would significantly impact the ability to supply benchtops to Australian homes, and further impede the construction of homes in a market already impacted by a housing shortage.

2. If yes, do you support a prohibition on the use of all engineered stone irrespective of its crystalline silica content? Please support your response with reasons and evidence.

We DO NOT support a prohibition on all engineered stone.

3. 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.

We believe that all engineered stone can be safely manufactured under a licensing scheme where suppliers can only sell to manufacturers that have demonstrated systems that adhere to the required safety requirements. This system would eliminate any manufacturer not manufacturing safely. The safety systems are already well developed and have been implemented by most manufacturers.

Having said the above, more suppliers are providing engineered stone with 40% or less silica content. This product performs well and is a good substitute to 94% silica benchtops. We support a move to a maximum of 40% silica products. We understand that this content is also in line with content in other products such as granite and porcelain benchtops and tiles. However, there remains a need to safely manufacture with these products. Thus, it's our opinion that both, safe practice standards or licencing, and the reduction of silica content should be applied.

4. How many businesses work with engineered stone only?

Coastline Kitchens employs 100 staff and contractors and manufactures and installs cabinetry and engineered stone benchtops to new homes in WA.

Our total annual revenue is appr \$25m. Our annual revenue from engineered stone benchtops is appr \$10m.

90% of all jobs have engineered stone benchtops, and of these 90% have engineered stone benchtops with silica content >40%.

For these businesses, please provide where possible:

- the number of sole traders and small businesses (1-20 employees), medium businesses (21-200 employees), large businesses (>200 employees)
- the number of workers in these businesses, by business size
- the average annual revenue, by business size
- the proportion of business activity with engineered stone containing 40% or more crystalline silica content, by business size
- the proportion of business activity with engineered stone containing less than 40% crystalline silica content, by business size.

Please use the table below to enter this information.

<b>Business type</b>	<b>Description</b>	<b>Sole traders and small business</b>	<b>Medium business</b>	<b>Large business</b>
Business working with	Number of businesses			
	Number of people employed			

engineered stone only	total annual revenue (approximate, rounded to nearest \$10,000)			
	Proportion of business activity involving ES with $\geq 40\%$ silica			
	Proportion of business activity involving ES with $<40\%$ silica			

Click or tap to enter text.

5. How many businesses work with both engineered stone and non-engineered stone products?

Coastline Kitchens also manufactures and installs laminated benchtops. (We do not manufacture granite benchtops) Approx. 10% of our jobs have laminated tops.

6. Do you have any data or information on the risks to workers from the other non-crystalline silica elements of engineered stone? Are these risks increased in engineered stone of less than 40% crystalline silica content?

We do not know of any increased risks in using products with 40% silica or below.

7. In relation to Option 3, do you have:
- any information on the additional benefits of a licensing scheme over the enhanced regulation agreed by WHS ministers (Option 5a) that would already apply to engineered stone products containing less than 40% crystalline silica content?
  - feedback on the implementation of concurrent licensing schemes for both prohibited engineered stone and non-prohibited engineered stone?

Click or tap here to enter text.

8. Are the assumptions and scenarios described for Option 6 in the Decision RIS accurate and appropriate? If not, why? Please provide additional information to support the impact analysis.

Option 6 (total ban) presumes that engineered stone benchtop products can be easily substituted. This is questionable. Due to the very high level of uptake of engineered benchtops there is very little capacity for other products. And if Engineered stone with less than 40% silica is banned, would other silica-based products such as porcelain and granite also be banned? Is it the material content that would be the focus of the ban?

9. Are there any other options or issues you think should be considered for a prohibition on the use of engineered stone?

If all products with silica are banned for use as benchtops, then this would impact most porcelain, granite and engineered stone benchtops. The only available alternatives would be

laminated and plastic benchtops. This would be a draconian over-reach that is not necessary. Plastic or acrylic products (e.g., Corian) also produces dust that is likely to be hazardous.

**10. 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?**

If all forms of engineered stone are prohibited, then there should be a long transitional period. We have 2600 jobs that clients have already selected stone benchtops. These jobs will be installed over the next 2+ years! It would be problematic for builders to have to get clients to reselect to alternative products (e.g., laminated benchtops). Also, the industry would struggle to produce the volumes of alternative products, as the manufacturing systems would need to be built.

We would have to dismantle our stone fabrication facility (worth \$5m+) and invest another \$5m+ into a production facility for other products. This will take time and will result in significant increased costs for Australian consumers. It's likely that there will be several years where cabinet installations will be delayed as there will not be an ability to supply an alternative product.

The transitional period to <40% silica can be much shorter. Suppliers are advising that they will be able to supply enough quantities required within the next 12-24 months and are already pivoting to that composition of product.

**11. 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?**

We have not had any impacts of health issues on any of our workforce.

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

For example, the direct impacts on the affected worker from the disease, the impacts on the mental health of affected workers and their families, the healthcare costs to the affected worker, loss of income for affected workers and their families, the costs to the health, workers' compensation and social support systems.

We have been manufacturing engineered stone benchtops for approx. 14 years and have not experienced any health effects from silicosis.