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.

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
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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

[redacted]

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.

No I do not. As we have proved in our business when the correct PPE is worn and the right safety measures are taken respirable crystalline silica dust is kept to an absolute minimum and is not dangerous to the employee. All the stone suppliers are also changing to low silica stone which will mean employees will be at even less of a risk to silicosis.

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.

Click or tap here to enter text.

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.

Yes, if most suppliers can bring content to under 35% risk it would help lessen the risk for employees and those in the stone masonry industry.

4. How many businesses work with engineered stone only?

   For these businesses, please provide where possible:

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

Business type	Description	Sole traders and small business	Medium business	Large business
Business working with engineered stone only	Number of businesses			
	Number of people employed			
	total annual revenue (approximate, rounded to nearest $10,000)			
	Proportion of business activity involving ES with ≥ 40% silica			
	Proportion of business activity involving ES with <40% silica			

Do not understand this question.

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

For these businesses, please provide where possible:

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

Please use the table below to enter this information.

Business type	Description	Sole traders and small business	Medium business	Large business
Business working with both engineered stone and non-engineered stone products	Number of businesses			
	Number of people employed			
	Average yearly revenue (approximate, rounded to nearest $1000)			
	Proportion of business activity involving ES with ≥ 40% silica			
	Proportion of business activity involving ES with <40% silica			
	Proportion of business activity involving non-engineered stone products			

Click or tap here to enter text.

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?

No.

7. In relation to Option 3, do you have:
    a) 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?
    b) feedback on the implementation of concurrent licensing schemes for both prohibited engineered stone and non-prohibited engineered stone?

The implementation of the licensing system has helped to ensure our business has every possible safety processes and procedures in place to minimise the spread of respirable crystalline silica dust. This has helped to bring all stone masons up to speed with there OHS requirements.

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.

N/A

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

The stone mason industry is a very large industry and there would be thousands of people out of jobs. There would also be the issue of removal/working with stone that is already installed. There is silica in a lot of products, glass bricks, cement etc. so if there is a ban on these products it cannot be limited to just stone. There is also the disposal processes of all the current unused stone slabs that would have to be thought about.

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?

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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?

Click or tap here to enter text.

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.

Click or tap here to enter text.