Response ID ANON-3ZYE-Y63Y-6

Submitted to **Second phase open consultation for the National Dust Disease Taskforce**
Submitted on **2020-10-12 13:30:37**

Regulatory and Governance

1 From a regulatory perspective, what should be considered ‘engineered stone’? Please provide the rationale for your recommendation.

From a regulatory perspective, what should be considered ‘engineered stone’? Please provide the rationale for your recommendation:
I have no specific comment on this as I am not an expert in that area. What I would like to point out though is that there is a significant risk from non-engineered stone also such as brick & concrete. There is an enormous amount of cutting of these two materials alone and crystalline silica content can be up to 40% In these materials. It is important, in my view, that the Taskforce does not solely focus on engineered stone as the number of workers potentially exposed to crystalline silica from other masonry sources is much higher. This includes concrete cutting, wall chasing, tuck pointing, masonry block cutting etc. I am concerned most of the focus is on engineered stone when there is a significant risk from other masonry cutting activities.

2 Various jurisdictions have already banned uncontrolled dry processing of engineered stone. What other practical measures could be introduced to reduce worker exposure to silica dust?

Various jurisdictions have already banned uncontrolled dry processing of engineered stone. What other practical measures could be introduced to reduce worker exposure to silica dust?:
The stone industry and masonry cutting in general would benefit from much better engineered controls. Banning dry cutting is a great move but even with water suppression, dust is still present. New dust suppression and removal technologies are now available but not well known, that are much better than conventional control methods such as dry-vacuum or conventional wet suppression. See link.

https://youtu.be/9iAO_ENG7tg

3 Relevant to dust-related diseases, what mechanisms exist or could be further developed to ensure effective enforcement of regulations and codes of practice?

Relevant to dust-related diseases, what mechanisms exist or could be further developed to ensure effective enforcement of regulations and code of practice?:
Legislation with teeth that results in fines and other penalties where breaches are found. More resourcing so WorkSafe and other agencies can do checks and follow-up's. From our experience, eduction plays a role but many industry participants will not take this disease seriously until they are personally affected in some way or hear about other, who have been by doing the wrong thing.

4 Hazard elimination sits at the top of the hierarchy of control measures (see https://www.safeworkaustralia.gov.au/risk for an example of a hierarchy of control measures). Do you consider a ban (either total or partial) of high silica content engineered stone material, a proportionate and practical response to the emergence of silicosis in the engineered stone benchtop industry in Australia?

Hazard elimination sits at the top of the hierarchy of control measures (see https://www.safeworkaustralia.gov.au/risk for an example of a hierarchy of control measures). Do you consider a ban (either total or partial) of high silica content engineered stone material, a proportionate and practical response to the emergence of silicosis in the engineered stone benchtop industry in Australia?:
I do not support a ban. The main reason for this is that we have developed new technology to control crystalline silica (using a combination of water plus vacuum) that removes 10 to 20 times more dust at the cutting surface compared to conventional control technologies.

See link of video showing our technology in a concrete cutting setting compared to conventional wet and dry cutting.

https://youtu.be/9iAO_ENG7tg

We have independent data verifying how good this combination of water and vacuum together is. It is a world first.

If the engineering controls are good enough and are applied properly and consistently, they can mitigate the risk even when cutting high silica content materials.

5 The Taskforce is aware some jurisdictions are considering a licensing scheme for engineered stone. Do you consider this a proportionate and practical response in relation to the following:a. restricted (under licence) or otherwise prohibited manufacture in Australia?b. restricted (under licence) or otherwise prohibited importation and distribution?c. fabrication and installation performed only under licence?d. licence required after installation modifications or repurposing of installed engineered stone?

The Taskforce is aware some jurisdictions are considering a licensing scheme for engineered stone. Do you consider this a proportionate and practical response for: a. restricted (under licence) or otherwise prohibited manufacture in Australia? b. restricted (under licence) or otherwise prohibited importation and distribution? c. fabrication and installation performed only under licence? d. licence required after installation modifications or repurposing of installed engineered stone?:
See answer to previous question.

6 What learnings from the re-emergence of accelerated silicosis as an occupational health and safety risk can be applied to enhance workplace health and safety systems more generally?

What learnings from this issue of the re-emergence of an occupational health and safety risk can be applied to enhance workplace health and safety systems?:
As per my answer to question 1 it seems that the direction the taskforce is heading is just to consider engineered stone. If that is seen as the only or main risk, that is a mistake.

Key learnings are:

There has been too much complacency for too long - we are frustrated as we have been pushing this issue in WA for many years with little success. It always takes silicosis cases and deaths before action is taken.
Other masonry industries must be included in the focus of the taskforce, not just engineered stone. I am concerned this is the way the taskforce is heading.
Many businesses will not do the right thing by eduction alone. Strict emforcement measures and adequate resourcing is required which means accountability must be present.
Engineering controls can be very effective in controlling silica dust because they control the dust at the source but new technologies must be invested in and embraced by the regulator and industries.

Workforce Organisational Culture

1 Given the nature of the building and construction industry, and the increase in the number of smaller, often independent businesses and suppliers, what particular strategies and supports are needed to ensure that these businesses are able to provide adequate protection for workers?

Given the nature of the building and construction industry, and the increase in the number of smaller, often independent businesses and suppliers, what particular strategies and supports are needed to ensure that these businesses are able provide adequate protection for workers?:
The availability of equipment and new engineered technologies that can complete the required tasks safely

More resourcing for WorkSafe to enforce compliance

More embracing of new technologies by WorkSafe

2 What health and safety strategies can be improved?

What health and safety strategies can be improved?:
More compliance activity based around the correct use of best practice technologies

3 What return to work support is available or should be considered to assist workers following a diagnosis of silica-associated disease, including for those who are unable to return to the engineered stone industry?

What return to work support is available or should be considered to assist workers following a diagnosis of silica-associated disease, including for those that are unable to return to the engineered stone industry? :
Not sure

4 What are examples of good dust exposure workplace monitoring processes? (Where possible please provide evidence to support the effectiveness of these processes).

What are examples of good dust exposure workplace monitoring processes? (Where possible please provide evidence to support the effectiveness of these processes).:
I have some examples of air monitoring studies we have completed with Industrial Hygienests but I am unable to attach the reports.

Resourcing and Capability

1 What specific resources (eg information, education, other supports etc.) are required, that are not currently available, for small to medium sized businesses, to ensure that owners and staff are fully informed of the availability and correct use of control methods, including by workers from non-English speaking backgrounds?

What specific resources are required, that are not currently available for small to medium sized businesses to receive information, education and support in order to be fully informed and to educate employers and employees on the availability of and correct use of control methods, including by workers from non-English speaking backgrounds?:
Online video tutorials I.e correct use of tools and PPE

2 With a specific focus on dust related diseases, what mechanisms exist that could be used as a basis for providing a coordinated national system with representation across stakeholder disciplines for identifying and communicating emerging issues?

With a specific focus on dust related diseases, what mechanisms exist that could be used as a basis to provide a coordinated national system with representation across stakeholder disciplines for identifying and communicating emerging issues?:
An online resource that could capture new information and issues and be shared within a group format and coordinated by some full-time resource

Research and Development

1 What industry mechanisms could be introduced to ensure workers have appropriate competencies for handling engineered stone or preforming processes that generate silica dust?

What industry mechanisms could be introduced to ensure workers have appropriate competencies for handling engineered stone or preforming processes that generate silica dust?:
An approved industry training guide or qualification

A register of new innovations and technology that could be shared to show what engineered technologies are available to improve dust control

2 What are the specific challenges related to linking workplace exposure with disease development (at a later date) and how should these be addressed?

What are the specific challenges related to linking workplace exposure with disease development (at a later date) and how should these be addressed?:
If annual air monitoring and health survellience is mandatory for any industry workers potentially exposed, this will capture most cases

3 What are three key pieces of information about dust disease that you would like to see collected at a national level? What are the three key uses of the information collected at a national level?

What are three key pieces of information about dust disease that you would like to see collected at a national level? What are the three key uses of the information collected at a national level?:
Best practice engineering controls - these can virtually eliminate dust at the source if they are good enough and used correctly. This can be collected and shared so the industry is aware of what best practice tools are actually available

Online Educational videos and resources about the affects of silicosis and the main risk factors which can be shared and accessed or form part of mandatory training for all operators using machinery to cut masonry

4 What alternative products are currently available which could replace high silica-content engineered stone? How could we drive innovation in relation to products?

What alternative products are currently available which could replace high silica-content engineered stone? How could we drive innovation in relation to products?:
I know that natural stone has lower silica levels however I think this misses the point. If engineered controls are good enough and new ones are being developed, most dust can be controlled regardless of the % of crystalline silica in the material.

5 The interim advice identified immediate research priorities which has led to a research funding grant opportunity announced by the Medical Research Future Fund and National Health and Medical Research Council. Are there other research priority areas that have not been identified in the interim advice that should be considered, and why? What research areas should be a priority following this first round of research funding?

The interim advice identified immediate research priorities which has led to a research funding grant opportunity announced by the Medical Research Future Fund and National Health and Medical Research Council. Are there other research priority areas that have not been identified in the interim advice that should be considered, and why? What research areas should be a priority following this first round of research funding? :
Research into better dust mitigation technologies to remove dust at the source

Your submission

1 Publishable version of your submission

Publishable submission:
National Dust Taskforce - 2nd phase submission - Guarda Systsems.docx was uploaded

2 Full submission to be provided to the Taskforce

Full submission:
National Dust Taskforce - 2nd phase submission - Guarda Systsems.docx was uploaded

3 Upload your submission

Privacy information and consent to publish

1 Privacy and personal information

2 Consent to publish on the internet

I CONSENT to the submission being published in full on the webpage.

3 Third Party personal information and evidence of consent to publish

Third party consent:
No file was uploaded

Your details

1 Your name:

Name:
Craig Penty

2 Your email address:

Email:
craig@guardasystems.com

3 Your organisation (leave blank if individual):

Organisation:
Guarda Systems