

12 November 2020



Professor Paul Kelly
Chair National Dust Disease Taskforce
Acting Chief Medical Officer
Department of Health
GPO Box 9848
Canberra ACT 2601

Via email: dust.consultation@health.gov.au

Dear Chair,

Re: Second phase of open consultation – National Dust Disease Taskforce

Lung Foundation Australia

Lung Foundation Australia is the nation's leading and trusted lung health charity. The Foundation funds life-saving research, advocates for increased government support and delivers programs and services that transform the lives of those impacted by lung disease and lung cancer, giving hope in every breath.

National Strategic Action Plan for Lung Conditions

The Foundation recently received \$1 million over 4 years as part of the Priority Populations grant, a component of which will be used to deliver awareness and education campaigns to improve knowledge of occupational hazards and promote safe workplaces. While this is an encouraging start, it really does not begin to address the totality of the issues associated with exposure to hazardous products, including silica dust, and the devastating lung diseases that workers develop as a result of their exposure, such as silicosis.

The National Strategic Action Plan for Lung Conditions (the Action Plan) is the overarching plan to advance lung health in Australia, which the Foundation is committed to achieving. The objective of Priority Area 1 of the Action Plan, Prevention and Risk Reduction, is to prevent lung conditions and reduce the risk of lung disease, for a healthier and more productive Australia. Preventing lung conditions and reducing the risk of their development means reducing or avoiding exposure to common risk factors, including occupational hazards.

Occupational lung diseases are an important and under-recognised cause of respiratory ill health in Australia (Hoy & Brims, 2017). Occupational lung diseases can be prevented by identifying and removing occupational hazards and creating healthy and safe workplaces. Lung conditions have an enormous employment and

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productivity impact through time away from work and lower effectiveness, hence the need for greater workplace awareness and education.

Action 1.2 of Priority Area 1 is to deliver awareness and education campaigns to improve knowledge of occupational hazards that affect the lungs and to promote safe workplaces. The Foundation is committed to achieving this action through implementation of the following activities:

- Delivering multi-faceted awareness and education campaigns for occupational lung conditions that targets employers, employees, representative bodies (such as unions and industry groups where appropriate) and key work health and safety stakeholders (such as Safe Work Australia). Due to the latency period of occupational diseases, these campaigns will also target workers previously exposed to occupational hazards, including retired workers.
- Developing workplace-specific lung health materials to educate employers and employees on the preventable causes and symptoms of occupational lung disease, and support employers to act to reduce occupational hazards and provide healthy and safe workplaces.
- Developing workplace strategies which enable people with lung conditions to remain in active employment for longer.

Campaigns will target high risk industries, such as the mining, manufacturing, engineered stone working and building industries, and align with existing legislative requirements.

While the Foundation feels that implementation of these activities will result in safer workplaces and more productive Australians, it is still not enough to reduce the potential for harm and the incidence of disease associated with work related dust exposures.

Lung Foundation Australia's Feedback

The Foundation would like to provide the following feedback on the National Dust Disease Taskforce's Interim Advice:

Regulatory and Governance

- The Foundation calls for national consistency in regulation and enforcement.
- The Foundation considers a total ban of high silica content engineered stone material, with the material to be phased out entirely within three years, to be a proportionate and practical response to the emergence of silicosis in the engineered stone benchtop industry in Australia (4). The Foundation believes

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that the framework followed for the asbestos industry, which included a total ban on the product in 2003, is best practice.

Workforce Organisational Culture

- The Foundation calls for a national and state and territory compensation scheme for workers impacted by occupational lung disease, which includes the retooling, retraining and reskilling of these workers to enable their transition into other industries (9). Furthermore, the retooling, retraining and reskilling of workers is vital should a total ban of high silica content engineered stone material be implemented, so that workers within the engineered stone industry are not disadvantaged due to their choice of career.
- The Foundation considers that air quality monitoring is an example of an appropriate dust exposure workplace monitoring process (10).

Research and Development

- The Foundation calls for a nationally consistent, best practice health screening and monitoring program conducted by appropriately trained clinicians and linked to a national occupational lung disease register. The Foundation does not feel that a national accelerated silicosis register is adequate.
- The Foundation supports increased research investment into alternatives to engineered stone material for benchtops, which will support implementation of the hierarchy of control measures (16).
- The Foundation supports increased research investment into effective treatments for patients across the continuum of occupational lung diseases.

In summary, Lung Foundation Australia support the work of the National Dust Disease Taskforce to improve upon the prevention, early identification, control and management of occupational lung diseases in Australia.

Yours Sincerely,



Mark Brooke
Chief Executive Officer
Lung Foundation Australia

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References

HOY, R. & BRIMS, F. 2017. Occupational lung diseases in Australia. Medical Journal of Australia, 207, 443-448

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