

28 April 2021

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

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

Dear Professor Kelly,

The undersigned organisations wish to commend the National Dust Disease Taskforce on the publication of the Draft Vision, Strategies and Priority Areas for Action. The document proposes to progress priority areas for action which were outlined in our previous joint letters to yourself as Chair of the National Dust Disease Taskforce.¹

We support the key strategy areas and welcome the inclusion of licensing systems for businesses using engineered stone.

Whilst each of our organisations will be providing individual submissions to the Draft Vision we all agree that the following actions are necessary to significantly reduce the potential for harm and the incidence of disease associated with work related dust exposures.

In our letter of 2020, we outlined a staged approach with the following priority actions:

A three-year, explicit, staged approach to a ban on the importation and manufacture of engineered stone with a high silica content. Such a staged approach would include at least the following:

- *researching alternatives to engineered stone material for benchtops*
- *development of an Australian-manufactured safer product*
- *financial incentives for safer product development*
- *a regulatory approach that uses approaches similar to the various Regulations and Codes of Practice used in the asbestos removal industry, such as licensing enterprises, with differing licensing requirements dependent upon the nature of work performed*
- *supply chain education and awareness – including those who draft the specifications for building fit outs and customer education*
- *retooling of industry*
- *retraining of the workforce*
- *funding of relevant research.*

Our organisations continue to be committed to this approach and urge the NDDT to include in the Vision statement an explicit and staged approach to implement a ban on the use of engineered stone with high silica content. We also call for the timeframe for the implementation of the scheme

¹ Letters dated 14 November 2019 and 11 November 2020

to be three years from June 2021, which is the date the NDDT Report will be delivered to government.

It has already taken nearly two years to progress to this consultation and there are still unsafe work practices occurring. It is unacceptable that workers are developing severe silicosis in the 21st century. We are in a position to be able to assist with preventing much morbidity and mortality and should do this as quickly as possible. Australia is still dealing with the legacy of asbestos and does not need a repetition of this. We must work to implement these changes as quickly as possible. Our organisations believe a clear three year staged approach, commencing June 2021, to implement a ban on the use of engineered stone with high silica content is feasible.

Our organisations will be providing individual submissions to the Draft Vision, Strategies and Priority Areas for Action and wish to reiterate the importance of action which applies the highest level of control i.e., elimination of exposures to this deadly dust.

Recent Australian evidence reinforces the need for this approach.²

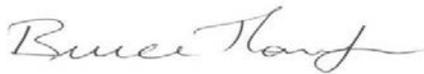
Yours sincerely,



Liam O'Brien
Assistant Secretary
Australian Council of Trade Unions (ACTU)



Tim Driscoll
Chair, Occupational and Environmental
Committee
Cancer Council Australia



Bruce Thompson
President
The Thoracic Society of Australia & New
Zealand



Mark Brooke
Chief Executive Officer
Lung Foundation Australia



² We understand that updated data from the Western Australian work indicates a higher number of cases
https://www.commerce.wa.gov.au/sites/default/files/atoms/files/2_december_2020.pdf -

<https://theconversation.com/renovating-your-kitchen-help-australias-tradies-avoid-silicosis-by-not-choosing-artificial-stone-156208>

<https://www.smh.com.au/national/ban-on-popular-benchtops-being-considered-as-wave-of-deadly-illness-sparks-alarm-20210416-p57jxy.html>



David Clarke
Chief Executive Officer
Australian Institute of Health & Safety (AIHS)



Terry Slevin
Chief Executive Officer
Public Health Association Australia



Dominic Yong
President
The Australian and New Zealand Society of
Occupational Medicine Inc (ANZSOM)

