

**Submission
No 17**

INQUIRY INTO 2019 REVIEW OF THE DUST DISEASES SCHEME

Organisation: Laminex

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2019 Review of the Dust Diseases Scheme – Laminex Australia

Laminex appreciates the opportunity to submit a response to the NSW review of the Dust Diseases Scheme.

Laminex has been importing engineered stone under the ESSAstone brand since 2006.

All suppliers that Laminex sources engineered stone from, are accredited under the European Union NEPSI Certification process for the manufacture, fabrication and installation of engineered stone. Whilst the scheme is not recognised in Australia, the certification demonstrates that Laminex Australia is sourcing engineered stone from responsible manufacturers. NEPSI is the acronym for the *European Network for Silica* formed by the employee and employer European sectoral associations having signed the Social Dialogue "Agreement on Workers Health Protection Through the Good Handling and Use of Crystalline Silica and Products Containing it" on about 25 April 2006.

Laminex Response to Silica Risks

Product Safety & Quality

Laminex only supplies ESSAstone to fabricator customers that have signed an acknowledgement of Laminex Fabrication manual which stipulates processing and fabrication requirements.

As part of the supply process, all of Laminex' fabricator customers are provided with product collateral including the Fabrication manual and Safety Data Sheets. The Safety Data Sheets contain information on the hazards associated with processing the product, the amount of crystalline silica contained in the product and the controls to be implemented in handling and using the product.

Laminex affixes labels on each slab providing simple visual and written warnings to the users of the hazards associated with cutting and fabrication of engineered stone. While other suppliers of engineered stone adopt a similar system, there is no standardised warning label within the industry. Laminex supports the introduction of a standardised warning label across the industry.

Responses Supported by Laminex

Laminex has been actively involved in supporting the Queensland Government and other jurisdictions in the development of a Code of Practice on "Managing respirable crystalline silica dust exposure in the stone bench top industry" – 2019. There were several reasons for this:

1. The process of developing a code involves a multi-disciplinary group of stakeholders from diverse backgrounds who bring medical, scientific and work place expertise to the development of a code. This enabled Laminex to proactively contribute to this forum as well as be informed of the latest scientific and empirical research conducted to enable the development of a set of industry practices designed to review and improve the safe processing of engineered stone.

2. When implemented, the code will be an independent legally enforceable standard and, which enables suppliers and fabricators to work within a clearly defined set of processes to continue to improve safety and occupational health requirements in the handling and processing of engineered stone.
3. With the creation of the Code of Practice by the Queensland Government under the harmonised regulatory framework, there is a potential for similar codes of practice to be adopted in other States to establish a uniform approach to the management of respirable crystalline silica in the work place. Laminex supports the consistent enforcement and, improvement of work place practices nationally.

Silica dust exposure levels

Silica is a very common naturally occurring compound and is found in a variety of natural and manufactured products such as sandstone, marble and cement in varying concentrations. Laminex has made customers aware of those activities which release Respirable Crystalline Silica (RCS) into the work environment and how these can be managed. From the time of ESSAstone's introduction into the market, wet cutting techniques have been the only cutting and fabrication techniques endorsed in the ESSAstone fabrication manual.

As a result, Laminex is very supportive of moves to reduce the proposed silica dust workplace exposure standards from 0.1 mg/m³ down to 0.05mg/m³. Our support for the reduction was based, in part, on Occupational Health testing completed in Queensland by Workplace Health and Safety and overseas research. The research was reviewed and discussed as part of the development of the Queensland Code of Practice.

Future responses from Government Supported by Laminex

Laminex strongly supports the development of "unified" codes of practice and enforcement processes dealing with managing respirable crystalline silica dust exposure in the stone benchtop industry and a third-party independent certification scheme which includes the following measures:

- Banning dry cutting/polishing/forming of engineered stone.
- Mandatory testing of workers exposed to cutting/polishing/forming processes to ensure RCS management processes remain effective in protecting health.
- The recommendation of fabrication equipment and suppliers capable of meeting the required standards both now and into the future.
- An independent "Third Party" audit process which has the capacity to remove Fabricators from the supply chain who do not comply with the third-party certification scheme.

Laminex and AESAG membership

Laminex was actively involved in the initial meetings of AESAG. However, without detracting from the considerable efforts from the members of AESAG, it was Laminex's preference to focus on the development of the Queensland Code of Practice as described above. Therefore, Laminex elected to withdraw from AESAG.

However, now that the Queensland Code of Practice has been implemented and assuming (hopefully uniform) codes are adopted in each of the other States, we support the concept of an industry certification regime. If such a program can be introduced without issues under trade practices regimes, we believe it

will complement the safe handling requirements under the Code. Such as regime would best be administered by an independent body such as WorkSafe; SafeWork Australia.

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