

Submission form



Proposed Occupational Health and Safety Amendment (Crystalline Silica) Regulations 2021

Note: Areas marked with an asterisk (*) denote required information.

Type of submission *	Individual <input type="checkbox"/>	Organisation <input checked="" type="checkbox"/>
Organisation name (where applicable)	A.St.A. World-Wide (Agglomerated Stone Manufacturers Association)	
First name *	Click here to enter text.	
Last name *	Click here to enter text.	
Email address *		
Postal address		
Postcode *		
State *	Choose an item.	
Do you consent to WorkSafe publishing your submission?*	<input checked="" type="checkbox"/> Yes – WorkSafe may publish this submission with my name.	
	<input type="checkbox"/> Yes – WorkSafe may publish this submission, but without my name.	
	<input type="checkbox"/> No – WorkSafe may not publish my submission due to confidentiality reasons.	

Note: All submissions will be treated as public documents and will be published online unless clearly identified as being confidential. Where the submission is from an organisation, WorkSafe will publish the organisation's name not the author's name.

Does your submission contain personal information of any third party individual/s?*	<input type="checkbox"/> Yes	If yes, have you obtained consent from the third party individual/s to include their personal information in your submission?	<input type="checkbox"/> Yes
	<input checked="" type="checkbox"/> No		<input type="checkbox"/> No

Note: If you have not obtained consent from the third party individual/s, WorkSafe may elect not to publish your submission or may redact third party information from your submission.

Can WorkSafe contact you about your submission?*	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Note: WorkSafe may use the information you have provided to inform you of further development of the proposed regulations.

Proposed Occupational Health and Safety Amendment (Crystalline Silica) Regulations 2021

Please provide your comments on the proposed Occupational Health and Safety Amendment (Crystalline Silica) Regulations 2021 below. Where possible, please indicate the section you are commenting on. General comments about the regulations are also welcome.

General comments	
<p>A.St.A. strongly supports licensing of stonemasons, with the following emphases:</p> <p>firstly, A.St.A. believes that the regulation should address all the materials that content over 20%-30% of crystalline silica, regardless if they include resin or not, as that is the source of the risks that is being addressed. For example, sandstone – which contains 80% to 95% crystalline silica but doesn't contain resins – will not be under the definition of “engineered stone”, thus the stonemasons working with that material won't be included under the reform.</p> <p>Secondly, the regulation doesn't address other important stakeholders, such as builders and kitchen companies, that should also be restricted from working with unlicensed stonemasons. In that way, even if an unlicensed stonemason succeeded somehow to purchase engineered stone – it will be harder for him to sell his product or contact with end-customers.</p> <p>Lastly, it isn't realistic to obliged the manufacturer or supplier to provide information about exposure standards, as the standards varies from state to state and varies over time. In our opinion the manufacture should be required to refer customers to the local authorities regarding the relevant exposure standards for that jurisdiction (instead of informing the standard itself).</p>	
Specific comments	
<i>Regulations 1 – 5</i>	Click here to enter text.
<i>Part 4.5 – Crystalline silica Division 1 – Introductory matters</i>	Click here to enter text.
<i>Part 4.5 – Division 2 – Duties of manufacturers and suppliers</i>	Click here to enter text.
<i>Part 4.5 – Division 3 – Duties of employers and self-employed persons</i>	Click here to enter text.
<i>Part 4.5 – Division 4 – Licensing requirements</i>	Click here to enter text.

<i>Part 4.5 – Division 5 – Transitional provisions – Engineered stone licences</i>	Click here to enter text.
<i>Part 6.1 – Licences – Subdivision 6 – Additional provisions in relation to an engineered stone</i>	Click here to enter text.

Regulatory Impact Statement

General comments	
<p>A.St.A. supports options number one. In order to cease unsafe and unprofessional work-practices there should be a prohibition on supplying stones that contains certain percentage of crystallin silica to unlicensed stonemasons.</p> <p>A.St.A. strongly opposes to a ban on the supply and use of engineered stone. Such discriminating ban will not solve the risks of fabricating other stones that contains crystalline silica. Regardless, there is no justification in banning a product that can be used safely for consumers and safely for workers, provided proper handling techniques are followed.</p>	
Specific comments	
<i>Executive summary</i>	Click here to enter text.
<i>Part 1 – Background</i>	Click here to enter text.
<i>Part 2 – The problem of silica dust</i>	Click here to enter text.
<i>Part 3 – Options</i>	Click here to enter text.
<i>Part 4 – Impact analysis and preferred option</i>	Click here to enter text.
<i>Part 5 – Preferred option</i>	Click here to enter text.

<i>Part 6 – Cost recovery and fees</i>	Click here to enter text.
<i>Part 7 – Small business and competition impacts</i>	Click here to enter text.
<i>Part 8 – Evaluation strategy</i>	Click here to enter text.
<i>Part 9 – Implementation strategy</i>	Click here to enter text.

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Collection statement: WorkSafe collects and handles personal information in accordance with Victorian privacy laws and principles, as well as its Privacy Policy. You can access WorkSafe's Privacy Policy [here](#). Your name and contact details are collected by WorkSafe for the purpose of identifying and responding to your comments or submission on the proposed Occupational Health and Safety Amendment (Crystalline Silica) Regulations 2021 (Proposed Regulations) and associated Regulatory Impact Statement (RIS). Your feedback will be considered and applied to the proposed Regulations and RIS where appropriate.

Your submission will be published under your name or, where relevant, your organisation's name on the Engage Victoria website, unless you select the relevant check box to say that you do not wish to have your submission published. Your contact details will not be published regardless of whether you select the relevant check box.

You also have the option to provide your submission anonymously. If you do not wish for your name, or organisation's name, to be published with your submission, please select the relevant check box. If you choose to have your submission published, please ensure that individuals are not identified in the content. If you have any questions or would like to learn more about this project, please email legislation@worksafe.vic.gov.au. To access or correct the information you have provided, please contact privacy@worksafe.vic.gov.au.