

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 checked="" type="checkbox"/>	Organisation <input type="checkbox"/>	
Organisation name (where applicable)			
First name *	Dr Ryan		
Last name *	Hoy		
Email address *			
Postal address			
Postcode *			
State *	VIC		
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Note: WorkSafe may use the information you have provided to inform you of further development of the proposed regulations.			

Dear Director,

Thank you for the opportunity to provide comment on the proposed Victorian Occupational Health and Safety Amendment (Crystalline Silica) Regulations 2021.

My main area for comment relates to section "319ZD. Health monitoring to be conducted by specialist occupational and environmental physician"

The regulations state "that health monitoring is carried out in relation to an employee must ensure that the health monitoring is carried out under the supervision of a specialist occupational and environmental physician."

" A specialist occupational and environmental physician means a registered medical practitioner who is a fellow of the Royal Australasian College of Physicians, Australasian Faculty of Occupational and Environmental Medicine."

I propose two amendments to this section:

1. I recommend that the regulations indicate that monitoring physician has undergone training specific to the assessment of workers exposed to crystalline silica and the physician is accredited by WorkSafe Victoria to undertake these assessments.
 - a. I have been involved in the WorkSafe Victoria (WSV) Stonemason Programme from the establishment stage, and have assessed many workers who have participated in the programme. There are several components of the programme that require the physician to have specific education which is not provided to all Occupational Physicians through standard training.
 - b. The occupational and respiratory physicians currently involved in the WSV Stonemason Health Screening Programme have received further education by WSV and this must be continued in a formalised manner.
 - c. Health monitoring must be carried out in a standardised manner. The current WSV Stonemason Health Screening Programme follows a specific methodology in terms of the questionnaires administered, interpretation of responses, investigation performed and provision of a standardised report. The only means of achieving ongoing, standardised, effective assessments is for physicians to be provided specific training.
 - d. An example of a similar system currently in operation is the process for the accreditation of "Appointed Medical Advisors" by Resources Safety & Health Queensland (RHSQ). Doctors must undergo this process to be able to undertake health assessments for workers in the coal miner sector in Queensland. Doctors must complete the (online) University of Illinois Supervising Doctor training program and then have accreditation approved by RHSQ. RHSQ maintain a register of Appointed Medical Advisors: <https://www.rshq.qld.gov.au/business/mining/safety/registered-medical-search>
 - e. WorkSafe Victoria has already developed processes for accrediting physicians beyond noting specialist qualifications such as the process for accreditation of independent medical examiners.
2. I recommend that in addition to occupational and environmental physicians, health monitoring can be carried out under the supervision of a specialist respiratory physician, who is a fellow of the Royal Australasian College of Physicians.

- a. I recommend that respiratory physicians are also suitable to monitor health assessments of silica exposed workers but in combination with the previous recommendation – provision of specific training and accreditation by WSV.
- b. The risk related to silica exposure primarily relates to the development of lung disease, including silicosis. Specialists respiratory physicians have a high level of expertise in making diagnoses of lung disease.