



To Whom It May Concern,

Victorian Trades Hall Council (VTHC) was founded in 1856 and is the peak body for unions in Victoria. VTHC represents approximately 40 unions and over 430,000 workers in Victoria. These workers are members of unions that reach into every industry in the state, both in the public and private sectors.

VTHC has had a long history of fighting for and defending the rights of workers in Victoria, and ensuring the right of all workers to come home to their families safely and in good health has always been core union business.

Few advances in the quality of life for working people would have been achieved without the involvement of the Victorian union movement.

As the peak body representing workers across Victoria, we write to you in opposition to the application made by the Australian Engineered Stone Advisory Group which would allow them to adopt and dictate industry accreditation standards for fabricators and stonemasons. It is our view that if the proposed practices are allowed to go ahead, they will not only weaken the already stringent requirements for health and safety that exist around crystalline silica, but will reduce competition in the industry.

We wish to write in support of the submission made the Australian Council of Trades Unions, as well as make the following points:

- 1. The decrease in competition will not be offset by a net benefit for the community at large, specifically there will be no improvement to the health and safety of workers who fabricate and install engineered stone.**

The ability to self-regulate, when a strict legislative framework already exists, will do nothing to increase the health and safety of the workers using this product. There has been a steep increase in the number of stonemasons diagnosed with chronic lung diseases such as silicosis, which correlates with the widespread use of engineered stone in recent years. To combat this, state and federal governments have introduced a number of measures aimed at ensuring employers are not putting workers at risk. In response to this, we feel this application being considered is a clear attempt by the suppliers of these products

to distance themselves from any responsibility over the use of their products and undermine the enhanced regulatory framework.

Due to the nature of occupational health and safety, the state of knowledge around certain substances and practices is always changing. If the next step in the conversation is that these companies can accredit certain practices and companies “safe” this will derail a very real and necessary conversation around whether engineered stone can be used safely at all. Much like asbestos, it is becoming increasingly clear that there may indeed be no way to completely control the risk other than complete elimination, i.e. a blanket ban. AESAG will have no interest in developing the state of knowledge objectively, and will be motivated only by commercial interests. They should not, therefore, be allowed to accredit anything or anyone as “safe.”

2. There will a negative impact on competition achieved by the granting of the application and therefore no benefit to the Australian consumer;

We believe that the proposed self-regulation will reduce competition by creating a monopoly due to the extra barrier of entry into the market it will create. The proposed training and accreditation processes will undermine OHS by improperly placing the burden on employees, and therefore a company who is interested in meeting best practice in the industry may find themselves out of favour with the industry body or costed out of the marketplace. It is properly the relevant state and federal regulators who should be setting industry standards around OHS and accreditation.

3. For these reasons, we submit that the application be rejected.

For any questions about this submission, please contact Dominic Melling OH&S Lead Organiser at VTHC on [REDACTED]

Sincerely,

Wil Stracke
Assistant Secretary
Victorian Trades Hall Council