

As at 28 January 2020, the ACCC has received 3,802 submissions generated from a campaign by the Victorian Trades Hall Council.

An example of the submissions received by the ACCC is below:

Dear Adjudication,

Victorian Trades Hall Council has created a campaign entitled **Tell the ACCC - No self-regulation on silica!** on [Megaphone](#) that identifies you as the decision maker. As part of this campaign, member **[NAME]** wrote:

To Whom It May Concern:

I wish to add my voice to those who have raised concerns about the self-regulation regime proposed by the companies who produce engineered stone. The self-regulation will result in practices that restrict competition and will not benefit the community at large, and for this reason should be opposed. Workers are dying of silicosis in record numbers, and this body seeks only to protect its members from future liability.

Recently, both federal and state governments have taken actions to address the massive rise in fatal lung diseases which corresponds directly with the increased popularity and distribution of engineered stone. It is a product that is dangerous by its nature, and if it is to be used at all (even though a conversation is taking place about whether it should be banned entirely due to similarities with asbestos) then it must be highly regulated in its use. By setting their own standards for training and accreditation, which will not add anything to an already rigorous legal framework that exists, we believe that companies will be able to rubber stamp their own deniability and wash their hands of the duties that are placed on them by OHS legislation.

I believe that the proposed self-regulation will also reduce competition as it will create a monopoly due to the extra barrier of entry into the market it will create. The proposed training and accreditation processes will, in effect, be counterproductive for a company in fulfilling its OHS duties (through its shifting of liability back onto the workers that are to be deemed "accredited") and therefore a company who is interested in doing the right thing may find themselves out of favour with this industry body. The only bodies that should have a say over a company's practices in this regard are the relevant state and federal OHS regulators.

For these reasons, I oppose the approval that is being sought in this application and urge you to do the same.

I would also like to add my support to the submissions made by the Victorian Trades Hall Council and the Australian Council of Trade Unions.