



Australian Government
**Department of Employment
and Workplace Relations**

Meeting Brief

To **Minister for Employment and Workplace Relations**
Subject **Meeting brief** | s 47F(1) s 47G(1)(a) |
Tuesday 21 November 2023

Meeting Details

Date: Tuesday, 21 November 2023

Time: 4:20 – 4:50 pm

Venue: Electorate Office, Punchbowl

Attendees: s 47F(1) s 47G(1)(a)
s 22(1)(a)(ii) , Adviser

Departmental Officers: s 22(1)(a)(ii) , Assistant Secretary Safety and Compensation Policy
Branch (virtual)

Meeting purpose

1. You are meeting with s 47F(1) to discuss the recommendations set out in Safe Work Australia's Decision Regulation Impact Statement: *Prohibition on the use of engineered stone* (Decision RIS), and to hear his concerns regarding the impact a ban on engineered stone may have on affected businesses in the industry.
2. Six out of the 8 jurisdictions (NSW, Vic, ACT, SA, Qld, Tas) have publicly indicated their support for a prohibition on the use of engineered stone. This indicates the two-third requisite majority agreement will be reached at the upcoming meeting of Work Health and Safety (WHS) Ministers on 13 December 2023. Engagement with s 47F(1) is to ensure that industry stakeholders are adequately consulted prior to WHS Ministers meeting in December and to hear industry concerns that may need to be further considered in relation to transitional arrangements and supports.
3. Talking points to support discussion are at Attachment A.

Stakeholder position

4. s 47F(1), s 47G(1)(b)

This correspondence is at

5. Attachment B.
s 47F(1), s 47G(1)(b)

s 22(1)(a)(ii)

6. A biography on s 47F(1) is at Attachment C.

Government policy position

7. s 34(2), s 34(3), s 47C

8. s 34(3), s 47C

Consultation

9. While developing the Decision RIS, Safe Work Australia undertook a public consultation process, receiving 114 submissions. Submissions were received from businesses working with engineered stone, industry groups, professional organisations, peak health bodies, government agencies, unions and individuals with an interest in the matter. There is no submission published from s 47G(1)(a) to Safe Work Australia.

Attachments

Attachment A Talking Points

Attachment B s 47F(1) correspondence of 10 October 2023

Attachment C Biography – s 47F(1)

Clearance

Primary Contact Officer: s 22(1)(a)(ii)
Safety and Compensation Policy Branch
| WR | Safety and Industry Policy

Clearance Officer: s 22(1)(a)(ii)
| WR | Safety and Compensation Policy Branch
Safety and Industry Policy

Director, Silicosis Taskforce
Ph: s 22(1)(a)(ii)
Mobile: s 22(1)(a)(ii) 7

Assistant Secretary
Ph: s 22(1)(a)(ii)
Mobile: s 22(1)(a)(ii)

Comments



Talking Points Meeting with ^{s 47F(1)}

- On 27 October 2023, Commonwealth, state and territory work health and safety (WHS) Ministers agreed to the public release of the Safe Work Australia report to ensure public debate is informed by the expert analysis set out in the report, ahead of Ministers settling a national policy position to prohibit or limit the use of engineered stone.
- Safe Work Australia's report sets out a compelling call for action to protect those working in the industry. The report recommends an immediate ban on the use of all engineered stone products, noting:
 - Australian workers are developing silicosis as a result of working with engineered stone.
 - Silicosis is preventable, but WHS laws are not protecting workers due to a persistent lack of compliance across industry at all levels.
 - There is no toxicological evidence that lower silica engineered stone is safer for workers.
 - Implementing a threshold ban may encourage greater non-compliance with WHS obligations through the incorrect perception that these products are safer.
- The report makes clear that the chemical and physical properties of silica dust generated from engineered stone result in a faster onset and more severe disease, which is affecting young workers, many who are under the age of 35.
- WHS Ministers will reconvene on 13 December 2023 to come to a decision on the options set out in SWA's report to prohibit or limit the use of engineered stone under the model WHS laws.



- WHS is a shared responsibility, with Commonwealth, state and territory governments responsible for implementing and enforcing WHS laws in their jurisdiction.
- For amendments to the model WHS laws to have effect, a two-third majority of WHS Ministers must vote in favour of the change. Each state and territory must then implement these changes in their own jurisdictions.
- While Safe Work Australia's recommendation is very clear, I recognise that a prohibition on the use of engineered stone is a significant policy decision and will impact workers and businesses across the industry.
- Safe Work Australia's report provides analysis of the regulatory options under the model WHS laws to prohibit the use of engineered stone, including the impacts of each option on businesses, government and workers. This analysis will be considered by WHS Ministers in settling any decision.
- Feedback from industry in relation to this matter is important and the meeting today provides a valuable opportunity for this to occur. As such, I would welcome any comments or concerns that you wish to raise regarding the recommendation set out in Safe Work Australia's report.

s 47G(1)(b)

s 47F(1)

s 47G(1)(b)

s 47G(1)(a), s 47G(1)(b)

s 47G(1)(b)

s 47G(1)(b)

s 47F(1)

s 47F(1), s 47G(1)(a)



To Minister for Employment and Workplace Relations
Subject Meeting brief | David Cullen, Managing Director, Caesarstone Asia Pacific | Wednesday 22 November 2023

Meeting Details

Date: Wednesday 22 November 2023
Time: 11:00 am – 11:30 am
Venue: Minister's office CPO, 1 Bligh Street Sydney
Attendees: David Cullen, Managing Director, Caesarstone Asia Pacific
Yosef Shiran, Chief Executive Officer, Caesarstone Ltd
s 22(1)(a)(ii) , Adviser
Departmental s 22(1)(a)(ii) Deputy Secretary, Workplace Relations Group
Officers:

Meeting purpose

1. The purpose of the meeting is to discuss the recommendations set out in Safe Work Australia's Decision Regulation Impact Statement: *Prohibition on the use of engineered stone* (Decision RIS) and to allow Caesarstone to raise any concerns about the potential impact of a ban on its business.
2. Six of the states and territories (NSW, Vic, ACT, SA, Qld, Tas) have publicly indicated their support for a prohibition on the use of engineered stone. This indicates that the requisite two-third majority agreement for including this prohibition in the model work health and safety (WHS) laws will be reached at the upcoming meeting of WHS Ministers on 13 December 2023.
3. Talking points to support the discussion are at [Attachment A](#).

Stakeholder position

1. Mr Cullen wrote to the Minister on 15 November 2023 expressing concerns about the findings of Safe Work Australia's Decision RIS, suggesting that elements of the scientific evidence in the report were untested or highly speculative. The correspondence also notes the recommendation to prohibit the use of all engineered stone cannot be justified given the absence of conclusive scientific evidence. A copy of this correspondence is at [Attachment B](#).
2. Mr Cullen has indicated that his organisation could ensure all of its engineered stone products contained less than 10% crystalline silica content within 12 months if this was mandated, and noted that at this threshold, engineered stone would contain far less crystalline silica than most natural stone products (such as granite which typically contains 20-40% silica content).
3. Mr Cullen has noted that Caesarstone is in the process of collecting expert economic and toxicological opinions relating to a ban on engineered stone, and expects to be able to provide this analysis to Ministers in December for consideration. Mr Cullen has advocated for a final decision to prohibit the use of engineered stone be delayed until Caesarstone has delivered this evidence to Ministers.
4. s 47G(1)(b)

s 47C(1)

5. s 47G(1)(b)

s 47G(1)(D)

6. Mr Cullen's biography is at Attachment E.

Government policy position

7. s 34(2), s 34(3), s 47C

8. s 34(3)

9. s 34(3), s 47C

Consultation

10. While developing the Decision RIS, Safe Work Australia undertook a public consultation process, receiving 114 submissions. Submissions were received from businesses working with engineered stone, industry groups, professional organisations, peak health bodies, government agencies, unions and individuals with an interest in the matter. Caesarstone provided a submission through this consultation process.

Attachments

| | |
|---------------------|---|
| <u>Attachment A</u> | Talking Points |
| <u>Attachment B</u> | Summary – Schedule 10 Proposal |
| <u>Attachment C</u> | David Cullen correspondence of 15 November 2023 |
| <u>Attachment D</u> | Summary- Definition of Engineered Stone |
| <u>Attachment E</u> | Biography – David Cullen |

Clearance

Primary Contact Officer: s 22(1)(a)(ii)
 Safety and Compensation Policy Branch
 | WR | Safety and Industry Policy
 Clearance Officer: s 22(1)(a)(ii)
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 Safety and Industry Policy

Position Director, Silicosis Taskforce
 Ph: s 22(1)(a)(ii)
 Mobile: s 22(1)(a)(ii)
 Position Assistant Secretary
 Ph: s 22(1)(a)(ii)
 Mobile: s 22(1)(a)(ii)

Comments



Talking Points Meeting with David Cullen

- On 27 October 2023, Commonwealth, state and territory work health and safety (WHS) Ministers agreed to the public release of the Safe Work Australia report to ensure public debate is informed by the expert analysis set out in the report, ahead of Ministers settling a national policy position to prohibit or limit the use of engineered stone.
- Safe Work Australia's report sets out a compelling call for action to protect those working in the industry. The report recommends an immediate ban on the use of all engineered stone products, noting:
 - Australian workers are developing silicosis as a result of working with engineered stone.
 - Silicosis is preventable, but WHS laws are not protecting workers due to a persistent lack of compliance across industry at all levels.
 - There is no toxicological evidence that lower silica engineered stone is safer for workers.
 - Implementing a threshold ban may encourage greater non-compliance with WHS obligations through the incorrect perception that these products are safer.
- The report makes clear that the chemical and physical properties of silica dust generated from engineered stone result in a faster onset and more severe disease, which is affecting young workers, many who are under the age of 35.
- WHS Ministers will reconvene on 13 December 2023 to come to a decision on the options set out in SWA's report to prohibit or limit the use of engineered stone under the model WHS laws.



- WHS is a shared responsibility, with Commonwealth, state and territory governments responsible for implementing and enforcing WHS laws in their jurisdiction.
- For amendments to the model WHS laws to have effect, a two-third majority of WHS Ministers must vote in favour of the change. Each state and territory must then implement these changes in their own jurisdictions.
- While Safe Work Australia's recommendation is very clear, I recognise that a prohibition on the use of engineered stone is a significant policy decision and will impact workers and businesses across the industry.
- Safe Work Australia's report provides analysis of the regulatory options under the model WHS laws to prohibit the use of engineered stone, including the impacts of each option on businesses, government and workers. This analysis will be considered by WHS Ministers in settling any decision.
- Safe Work Australia has published the submissions it received during the consultation process in developing the report, including from your organisation. These submissions have been considered in finalising the findings and options outline in the report.
- Feedback from industry in relation to this matter is important and the meeting today provides a valuable opportunity for this to occur. As such, I would welcome any comments or concerns that you wish to raise regarding the recommendation set out in Safe Work Australia's report.
- I encourage you to provide any further evidence you have on the safety of engineered stone to Safe Work Australia.

15 November 2023

The Hon Tony Burke MP
Minister for Employment and Workplace Relations, Minister for the Arts

Dear Minister,

Safe Work Australia DRIS: Prohibition on the use of engineered stone

Caesarstone Australia has now had the opportunity to review Safe Work Australia's Decision Regulation Impact Statement on the proposed prohibition on the use of engineered stone (the report) and firmly believes that its flawed findings and analysis cannot be used to justify its drastic recommendation.

Among our principal concerns are that:

- **Elements of the scientific evidence in the report are untested or highly speculative.**

Notably, there is no conclusive evidence supporting assertions regarding contributions to toxicity and health risk by other components of engineered stone, such as resins and metal. This is acknowledged by the use of qualifying terms such as "may" or "might" in all statements in the report that reference these arguments.

At this time, Safe Work Australia's recommendation of an outright ban on only one product cannot be justified given the absence of conclusive scientific evidence

- **The report fails to consider whether products containing less than 10% silica content could be handled more safely than products that will not be banned.**

In their submissions, the Australian Institute of Occupational Hygienists, Lung Foundation Australia, the Public Health Association of Australia and others¹ submissions supported a complete prohibition but stated that if a threshold was to be set, it should be silica content below 10%. At this threshold of 10%, engineered stone would contain far less crystalline silica than most of the natural stone products that would not be subject to a ban (such as granite, typically 20-40% silica content and up to 72%).

If it was mandated, all Caesarstone products could have less than 10% crystalline silica content within 12 months, with a path to zero crystalline silica achievable until mid-2026.

Under these circumstances we believe it would be entirely unreasonable for such products to be the subject of an indiscriminate ban on all engineered stone.

- **The economic analysis underpinning the recommendation is completely flawed.**

The costs presented, based almost solely on the expense of administering a licensing scheme for dealing with 'legacy' engineered stone products, are vastly inflated due to various flaws in the methodology, including:

- i. Overestimating the number of PCBUs that will be impacted (by 50 times more);

¹ The Royal Australian College of Physicians and Cancer Council Australia

- ii. Proposing a dual and redundant licensing regime for 'legacy' engineered stone and for low silica products, when all stone containing silica must be regulated and handled the same way;
 - iii. Declining to consider cost recovery for a licensing scheme; and
 - iv. Failing to address the cost of properly regulating the stone industry by closing the identified gaps in regulation, enforcement and compliance – investments that must be made regardless of whether or not engineered stone is banned because the vast majority of stonemasons will continue to handle products containing silica that release RCS when cut. Excluding these costs to government, regulators and industry utterly misrepresents the costs and benefits of banning only one product.
- **Most alarmingly, that the report perpetuates the myth that banning engineered stone will eliminate the risk of silicosis for stonemasons.**

The unqualified statement that '*former fabricators and installers of engineered stone will no longer be exposed to RCS*'² as a result of a ban is patently false and, as Caesarstone has consistently warned, will leave the impression that other products containing silica are safe for workers to handle and the same lack of compliance that exists today will continue.

Going forward

Caesarstone is in the process of collecting expert economic and toxicological opinions to support these preliminary findings in greater detail and expects to be in a position to provide this analysis to ministers for their consideration as part of a comprehensive assessment of the report in December.

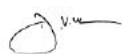
We would urge ministers to wait for this assessment before making a final decision that will have profound consequences not just for stonemasons but for all Australian workers exposed to the risk of silicosis and the wider building and construction industries.

To ban engineered stone based on this flawed analysis would be unreasonable and irresponsible. We again reiterate our belief that a better, less disruptive and more effective approach to tackling this issue is a prompt ban on higher-silica engineered stone with a rapid, defined pathway to levels below 10% and ultimately zero.

This must be accompanied by additional education and safety measures, including, as we have consistently advocated, the introduction of a nationwide licensing scheme for all parties that handle stone backed by rigorous enforcement by well-resourced regulators.

We look forward to any further consultation opportunities before a final decision is made on this issue.

Yours Sincerely,



David Cullen
Caesarstone Managing Director, Australia and New Zealand

² Respirable crystalline silica; DRIS, section 7.2.1

Attachment C

Summary – Schedule 10 Proposal

The Australian Chamber of Commerce and Industry, Master Builders Australia and the Housing Industry Association have proposed a model to restrict the use of engineered stone under the model WHS laws. It proposes adding engineered stone as a new item in Schedule 10 of the model WHS regulations to give effect to a 'ban', as this would restrict the use of engineered stone to authorised Persons Conducting a Business or Undertaking (PCBU).

s 47C(1)

s 47G(1)(b)

Biography

David Cullen

Managing Director, Caesarstone Australia and New Zealand



Mr Cullen joined Caesarstone in April 2010, bringing with him a wealth of corporate knowledge across a variety of industries with a deep regional focus.

He was previously General Manager of Komatsu Ltd.; CEO of Global Food Equipment Pty Ltd.; CEO of White International Pty Ltd.; CEO of Daisytek Australia Pty Ltd.; and CEO of Tech Pacific Australia Pty Ltd., preceded by other management positions at other companies since 1985.

He holds a Bachelor of Commerce degree from the University of New South Wales.

Yosef (Yos) Shiran

Chief Executive Officer, Caesarstone Ltd



Mr Shiran has served as Chief Executive Officer of Caesarstone Ltd. since 2023. He brings over 25 years of CEO experience at both private and publicly traded companies, including his former role as CEO of Caesarstone from January 2009 until August 2016.

In the period between 2016 and to Yos's current appointment as CEO of Caesarstone, he established several start-up companies in the ecommerce and other tech fields and also provided management services for a variety of companies. Before his initial term as CEO of Caesarstone, Yos served as the CEO of various public companies traded on the NYSE, LSE and TASE.

He has a B.Sc. in industrial engineering from Ben-Gurion University, Israel, and an MBA from Bar-Ilan University, Israel.

Caesarstone

Founded in 1987, Caesarstone was the pioneer of the natural quartz surfaces market.

Caesarstone Ltd. has its head office in Sdot Yam, Israel and now manufactures quartz surfaces at 3 facilities in 2 continents - two locations in Israel and one plant in Richmond Hill, GA, USA.

Caesarstone Ltd. has been traded on NASDAQ since 2012 (NASDAQ:CSTE) and has a presence in over 50 countries.

Caesarstone Australia launched a line of low-silica surfaces in 2022 and is committed to transitioning its entire portfolio to low-silica by the end of 2023.



To Minister for Employment and Workplace Relations
Subject Meeting brief | Cosentino Oceania | Thursday 23 November 2023

Meeting Details

Date: Thursday 23 November 2023
 Time: 9:30 am – 10:00 am
 Venue: Meeting room 3 level 21, CPO 1 Bligh Street Sydney
 Attendees: s 47F(1) Cosentino
 s 47F(1) Cosentino
 s 47F(1) Cosentino
 s 47F(1) SEC Newgate, s 47F(1)
 s 22(1)(a)(ii) , Advisor
 Departmental s 22(1)(a)(ii) Deputy Secretary Workplace Relations Group
 Officers:

Meeting purpose

1. The purpose of the meeting is to discuss the recommendations set out in Safe Work Australia’s Decision Regulation Impact Statement: *Prohibition on the use of engineered stone* (Decision RIS) and to allow Cosentino to raise any concerns about the potential impact of a ban on its business.
2. Cosentino manufactures and distributes a range of natural and engineered stone surfaces (e.g. benchtops, tiles, flooring, cladding). The company was founded in 1979, is based in Spain, and has 5000 employees worldwide. Its Australian office opened in 2013.
3. Six of the states and territories (NSW, Vic, ACT, SA, Qld, Tas) have publicly indicated their support for a prohibition on the use of engineered stone. This indicates that the requisite two-third majority agreement for including this prohibition in the model work health and safety (WHS) laws will be reached at the upcoming meeting of WHS Ministers on 13 December 2023.
4. Talking points to support the discussion are at Attachment A.

Stakeholder position

5. s 47F(1) wrote to you on 10 October 2023 expressing his organisation’s position that engineered stone products containing 40% or less crystalline silica should be allowed or, alternatively, products with 10% or less crystalline silica content should continue to be available. A copy of this correspondence is at Attachment B. Cosentino has since met with your office to clarify it would support a prohibition on engineered stone products containing over 10% crystalline silica, with a licencing scheme, which would also place obligations on suppliers.
6. Cosentino dispute Safe Work Australia’s findings in relation to the toxicity of other additives in engineered stone, such as resins and pigments; that cutting engineered stone creates smaller dust particles than natural stone (believed to increase risks to health); and that there is no safe level of silica content for engineered stone.
7. Cosentino has developed a number of products including Silestone Q10, which contains 10% or less silica, and Dekton, a product of a ceramic nature with particularly low crystalline silica content (in most cases 5-6% silica). Cosentino believes that banning low silica products, like their Silestone Q10 or Dekton, would shift the market to products with higher silica content (like natural quartzite (70%-95% silica), granite (20%-45% silica), concrete (20%-40% silica).
8. s 47G(1)(b)

s 47G(1)(b)

9. s 47C(1)

10. s 47G(1)(b)

Government policy position

11. s 34(2), s 34(3), s 47C

12. s 34(3)

13. s 34(3), s 47C

Consultation

14. Cosentino also met with departmental officials on 21 November 2023.

15. While developing the Decision RIS, Safe Work Australia undertook a public consultation process, receiving 114 submissions. Submissions were received from businesses working with engineered stone, industry groups, professional organisations, peak health bodies, government agencies, unions and individuals with an interest in the matter. The department understands Cosentino has provided Safe Work Australia with results of testing and air monitoring it has undertaken to demonstrate the risk of exposure to silica dust from fabricating their products using various control measures.

Attachments

Attachment A Talking Points

Attachment B Cosentino – Original correspondence – 10 October 2023

Attachment C Summary- Schedule 10 Proposal

s 47(1)(b)

Clearance

Primary Contact Officer: s 22(1)(a)(ii)
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| WR | Safety and Industry Policy

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Ph: s 22(1)(a)(ii)
Mobile: s 22(1)(a)(ii)

Position Assistant Secretary
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Mobile: s 22(1)(a)(ii)

Comments



Talking Points Meeting with Cosentino

- On 27 October 2023, Commonwealth, state and territory work health and safety (WHS) Ministers agreed to the public release of the Safe Work Australia report to ensure public debate is informed by the expert analysis set out in the report, ahead of Ministers settling a national policy position to prohibit or limit the use of engineered stone.
- Safe Work Australia's report sets out a compelling call for action to protect those working in the industry. The report recommends an immediate ban on the use of all engineered stone products, noting:
 - Australian workers are developing silicosis as a result of working with engineered stone.
 - Silicosis is preventable, but WHS laws are not protecting workers due to a persistent lack of compliance across industry at all levels.
 - There is no toxicological evidence that lower silica engineered stone is safer for workers.
 - Implementing a threshold ban may encourage greater non-compliance with WHS obligations through the incorrect perception that these products are safer.
- The report makes clear that the chemical and physical properties of silica dust generated from engineered stone result in a faster onset and more severe disease, which is affecting young workers, many who are under the age of 35.
- WHS Ministers will reconvene on 13 December 2023 to come to a decision on the options set out in SWA's report to prohibit or limit the use of engineered stone under the model WHS laws.



- WHS is a shared responsibility, with Commonwealth, state and territory governments responsible for implementing and enforcing WHS laws in their jurisdiction.
- For amendments to the model WHS laws to have effect, a two-third majority of WHS Ministers must vote in favour of the change. Each state and territory must then implement these changes in their own jurisdictions.
- While Safe Work Australia's recommendation is very clear, I recognise that a prohibition on the use of engineered stone is a significant policy decision and will impact workers and businesses across the industry.
- Safe Work Australia's report provides analysis of the regulatory options under the model WHS laws to prohibit the use of engineered stone, including the impacts of each option on businesses, government and workers. This analysis will be considered by WHS Ministers in settling any decision.
- Feedback from industry in relation to this matter is important and the meeting today provides a valuable opportunity for this to occur. As such, I would welcome any comments or concerns that you wish to raise regarding the recommendation set out in Safe Work Australia's report.



Tuesday, 10 October 2023

The Hon Tony Burke MP
Federal Minister for Employment and Workplace Relations

By email: tony.burke.mp@aph.gov.au

Dear Minister,

I write regarding the SafeWork Australia (SWA) consultation regarding the potential prohibition on the use of engineered stone.

Cosentino shares the concerns for the health and safety of workers in stone industry and protecting workers must be the main priority for all people in the sector.

We welcome all regulatory actions taken, such the recent ban on dry cutting, to prevent silicosis and other related occupational diseases. Silicosis is preventable when appropriated workplace safety measures are taken.

Thousands of fabrication workshops around the world using wet cutting, exhaust fans, ventilation and correctly wearing personal protective equipment (PPE), like masks, are proof this is possible.

Using materials with a low percentage of silica improves worker protection and is a positive, logical next step.

That is why since for the last several years we only produce engineered stone with less than 40% and 10% of silica content.

To ban engineered stone with less than $\leq 40\%$ would mean products like natural quartzite (70%-95% silica), granite (20%-45% silica), concrete (20%-40% silica) remain allowed, creating inconsistencies, unfair competition and potentially undermining the safety objective.

As a pioneer in the industry, Cosentino has developed Silestone Q10, a revolutionary product which contains 10% or less silica, and one of the most relevant milestones in the sector during the past several decades.

Silestone Q10 already represents an important part of our portfolio and Cosentino is in the position to ensure the supply chain security of the home building sector.

In a prohibition scenario, it is Cosentino's position that products containing 40% or less of silica content should remain allowed. **Alternatively, engineered stone with 10% or less of silica content should continue to be available in the market.**

Contact us | Cosentino City

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To complement this, we support mandatory licensing scheme for importers, stonemasons, and installers to prevent and control unsafe practices in the workplaces.

This approach represents the right balance between ensuring workers health and protecting an industry which employs thousands of people and supports hundreds of small businesses.

Banning low silica products, like the ones already developed by Cosentino and other manufactures, would shift the market to products with higher silica content such the ones referred above.

A regulation like this would have an adverse effect of not meeting the goal of protecting workers from silica dust exposure.

In addition to low silica products, we support:

- mandatory licensing of PCBUs working with engineered stone, including importers, and a fit-and-proper persons test to be a license holder with a loss of license for breaches
- ban on dry cutting of all stone products
- government grants for business to purchase wet-cutting equipment that can be used for all stone products
- improved training and education for stonemasons and fabricators on importance and correct use of PPE, available in different languages

Cosentino acknowledges reform in this sector will continue, and we support this because we're pioneers of the invention and creation of low silica materials.

Our balanced position supports our long-term ambition to have the safest industry that supports well-paying jobs for stonemasons and their families.

Cosentino has retained registered lobbyist SEC Newgate to assist us with this issue, please feel free to contact s 47F(1) to organise a meeting or ask questions.

Sincerely,
s 47F(1)

CC: All Work Health and Safety Ministers

Attachment C

Summary – Schedule 10 Proposal

The Australian Chamber of Commerce and Industry, Master Builders Australia and the Housing Industry Association have proposed a model to restrict the use of engineered stone under the model WHS laws. It proposes adding engineered stone as a new item in Schedule 10 of the model WHS regulations to give effect to a 'ban', as this would restrict the use of engineered stone to authorised Persons Conducting a Business or Undertaking (PCBU).

s 47C(1)

s 47G(1)(b)