## Construction Material Processors Association Inc.



P O Box 396, Kilmore, Victoria Australia, 3764

Inc. No. A0039304E ABN 85 154 053 129

17 December 2015

The Director
Occupational Hygiene Section
Safe Work Australia
GPO Box 641
Canberra
ACT 2601
Via email: WES@swa.gov.au

Dear Sir/Madam

## CMPA SUBMISSION ON THE ROLE OF CHEMICAL EXPOSURE STANDARDS IN WORK HEALTH AND SAFETY LAWS DISCUSSION PAPER

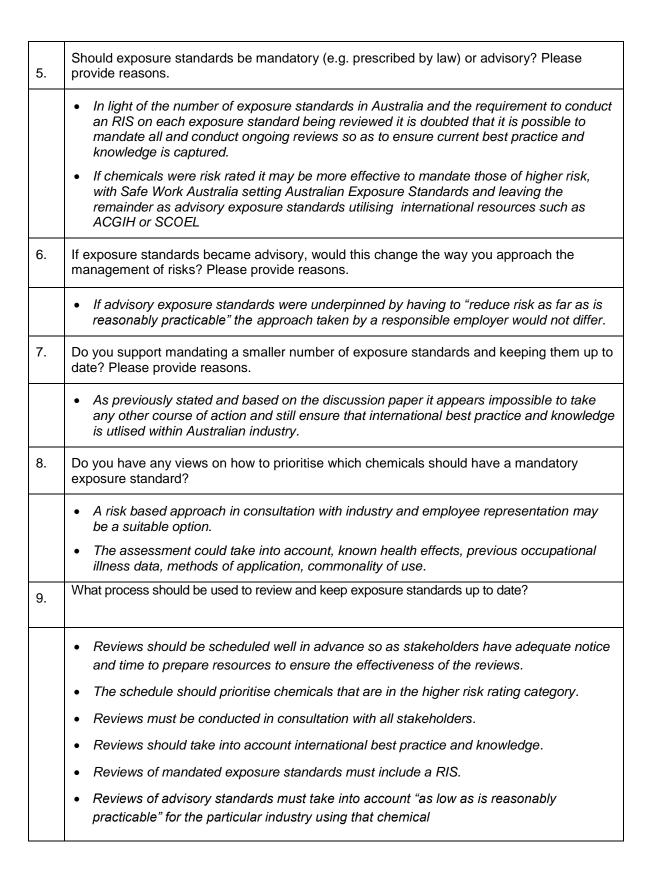
Thank you for the opportunity to make a submission to the Discussion Paper "The Role of Chemical Exposure Standards in Work Health and Safety Laws". The Construction Materials Processors Association (CMPA) is dedicated to the representation, advocacy and service of its Members in the Victorian Earth Resources industry. The CMPA represents a broad spectrum of businesses that extract and process hard rock, gravel, sand, clay, lime, soil, and gypsum. CMPA members also operate recycling businesses. CMPA members are typically small to medium sized family businesses, local government and utilities. Many are regionally based employers (90%) and support the Victorian economy through providing for local construction, major infrastructure and road maintenance needs.

The Extractive industry underpins growth and development in Victoria through supply of the construction materials described above. 47 million tonnes in 2012/13 was produced (~10 tonnes/person/annum in Victoria) to a value of approximately \$737 million. CMPA members account for approximately half of this production, and more than half of this industry sector's employment. Also of import is the need to have supply of construction materials located in close proximity to their utilization to save on transport costs and reduce the carbon footprint.

The CMPA supports responsible, balanced legislation and stakeholder engagement that is in the best interests of Victoria and Australia; and acknowledges Aboriginal communities and cultural heritage.

The following table contains CMPA's responses to the questions posed in the Discussion Paper.

	Questions
1.	Do you use exposure standards in your workplace?
	If yes—how do you use exposure standards? (e.g. to assess or control exposure, review controls etc.)
	If yes—do you meet exposure standards or seek to minimise chemical exposures further?
	Exposure Standards (ES) are used for Respirable Crystalline Silica in quarries.
	ES are generally used to determine a workers exposure, the necessity of health surveillance and the effectiveness of controls
	Within the quarry industry most activity can be undertaken without exposure being equal to or above the ES.
	Activity around the fixed plant such as inspection, cleaning or maintenance often relates to exposure being above the limit and workers are protected through the use of Personal Protective Equipment.
2.	How much does ensuring compliance with exposure standards cost your business (including air monitoring costs)? Please provide examples if possible.
	Monitoring is generally conducted annually in the early stages of a dust management program. Monitoring costs are based on number of samples taken and typically range between \$2000 and \$5000.
	Compliance cost include monitoring, training and education, health surveillance and physical dust control assets and their maintenance.
3.	Are you aware of other exposure or advisory standards in Australia or overseas (e.g. developed by international bodies or companies)? Do you use them? If so, please explain how.
	Are aware but have no knowledge of them being used
4.	Should Australia's exposure standards be health-based or pragmatic? Why?
	A mixture of both health-based or pragmatic exposure standards depending on the chemical and its application.
	<ul> <li>Industries have different processes that may or may not facilitate ensuring their processes can ensure workers are not being exposed, therefore "as low as is reasonably practicable may be the preferred option".</li> </ul>
	This should not be an option when considering high risk substances such as lead, asbestos and so forth



If you would like any further information please do not hesitate to contact me.

Yours sincerely

EMGdson

Dr Elizabeth Gibson

General Manager