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Consultation Draft National Silica-Related Diseases Research Strategy

The Housing Industry Association (HIA) takes this opportunity to respond to the Consultation Draft National Silica-Related Diseases Research Strategy (Research Strategy).

[Our submission](#) in response to the Safe Work Australia (SWA) Best Practice Review canvasses many principles that are integral to the workplace health and safety (WHS) regime and which frequently arise during consultation on proposed amendments to the laws. These principles are equally applicable to the Research Strategy and we refer to and reiterate them with respect to this consultation.

Robust evidence is fundamental to effective workplace health and safety

Objective data is invaluable in progressing effective reforms and implementing other non-statutory measures. It is vital in determining there is a genuine need and basis for a proposal, but also in the proper interrogation and cost-benefit analysis of that proposal. Additionally, a robust and detailed evidentiary base is imperative for the targeted progression of the research itself to ensure the benefits to both workers and PCBU's are maximised.

To this end, we are supportive of a well-rounded, responsive and nationally applicable Research Strategy for silica-related diseases to ensure the approach to reform is both informed and cohesive.

'Best practice' must not overshadow what is reasonably practicable

While best practice outcomes may be appropriate under certain circumstances, research must not be constrained by or focused upon progressing what may (or may not) be considered best practice. This approach, and the practical utility of the resultant research, are undermined by the subjective and ambiguous meaning of 'best practice' and signifies a race to the highest possible standard without consideration of whether that standard is appropriate under the circumstances. Fundamentally this sits at odds with the principles-based approach to the management of risk under the Model WHS laws.

Research into what is reasonably practicable, including control measures that are readily available, cost effective and will genuinely improve health and safety in the workplace, is vital to ensuring businesses of all scales can implement WHS improvements. This principle must be applied to all focus areas.

Research should focus on high-impact areas

Similarly, high impact areas should be prioritised and this is acknowledged under Focus Area 4, but must apply to the Research Strategy in its entirety.

To that end, research into critical and high-risk activities, impactful controls and significant outcomes should be prioritised over lower-risk work and less-effective administrative controls.

Examples include measures such as worker registers and exposure registers, which have not been demonstrated to serve any purpose other than to create an administrative burden and a trail of breadcrumbs for enforcement, future prosecutions or the pursuit of industrial relations agendas.

Instead, resources are better directed towards worker and employer education, quality information and materials, and subsidised controls, each of which serves to mitigate exposure and prevent adverse health impacts of crystalline silica exposure, including death, serious disease, and poor psychosocial outcomes. This must be captured in the Research Strategy.

Complete elimination should not obscure the opportunity for improvement

There is, and always has been, a considerable quantity of silica-containing products used in the building and construction industry. It is widely acknowledged by experts that complete elimination of crystalline silica exposure is not possible, even with today's higher-order controls.

While HIA supports success under the Research Strategy including reduced exposure, minimisation of disease burden, and improved health outcomes, commentary around the ultimate elimination of silica exposure sets a dangerous and impossible expectation for businesses, workers and government. It is necessary to remember that silica is not the same as asbestos and a different approach is warranted for research and control.

The Research Strategy must be informed by the broader policy context

With housing a key focus for state and federal governments, and the proportionately larger volume of safety laws that significantly impact building and construction, industry productivity and small business settings must be considered as a part of the Research Strategy. The application of both a productivity and small business lens to any future research will ensure that research will be useful and beneficial in informing reforms and other measures that deliver practicable outcomes for small businesses and support compliance in the delivery of homes without compromising safety.

HIA remains committed to working with SWA and governments to implement meaningful and practical WHS reforms and other measures to ease the pressures industry is facing. We look forward to the opportunity to engage further with SWA on the important research it undertakes and remain available to discuss any future avenues for contribution or collaboration.

Yours sincerely
HOUSING INDUSTRY ASSOCIATION LIMITED

A handwritten signature in black ink, reading "Stuart Collins". The signature is written in a cursive, flowing style.

Stuart Collins
Senior Executive Director
Compliance and Workplace Relations