

Ms Pothida Youhorn
Committee Secretary
Senate Community Affairs Legislation Committee
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Parliament House Canberra ACT
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14th August 2023

RE: Submission to the Inquiry into the National Occupational Respiratory Disease Registry Bill 2023

Dear Ms Pothida Youhorn,

The Public Health Association of Australia (PHAA) is the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians, strongly supports the National Occupational Respiratory Disease Registry (NORDR) Bill 2023.

The NORDR is one vital step towards providing essential disease and treatment surveillance, supporting data collection of engineered stone (ES) related diseases and their long-term health outcomes on ES workersⁱ and improving primary prevention strategies to ensure workplace safety. We hope that this is the first in a series of policies that address silicosis, a disease where 77.3% of the burden is fatal.

To ensure the NORDR achieves its objectives and strengthen the bill, PHAA makes the following recommendations:

- Initially, prescribed diseases include all those respiratory diseases associated with exposures to dust at work.
- All occupational respiratory diseases found in the Safe Work Australia List of Deemed Diseases in Australia, be prescribed and require notification to the National Registry on diagnosis.
- The inclusion of multiple exposures in “additional notification information” should be included in the “minimum notification information”.
- Broaden the content of the annual reporting by the Commonwealth CMO to include occupation, main job task, industry, and state.
- A National oversight body be established to provide independent review of NORDR functioning.
- Remove the restriction, subject to worker consent and ethic approval, on researchers access to information contained in section 21.

The consequences of silicosis on ES workers and their family's health and quality of life are irreversible. The NORDR is one item in the tool box. To ensure no further lives are affected by silica a suite of measures must be implemented.

- In support of the National Silicosis Prevention Strategy 2023-2028, we recommend that all use of ES is to be prohibited regardless of silica content.
- If the use of ES is not prohibited, a “less than 10%” silica content should be considered.
- Stronger silica regulations and licensing on use and training.
- Review of the reform measures and emerging evidence on a three yearly basis.
- Allow for the shortest possible transition period to a lower silica content product.

Yours Sincerely,

Terry Slevin
Chief Executive Officer
Public Health Association of Australia

ⁱ Lung Foundation Australia, “National Silicosis Prevention Strategy 2023-2028”, 2023. <https://lungfoundation.com.au/wp-content/uploads/2023/02/NSPS-NAP-Fifth-Full-Draft-Copy-for-Public-Consultation.pdf>