



To:

Mrs. Lisa Young

HM Coroner's Officer Manager Engagement and Policy Division – Manufacturing Sector

RE: Death of Wassam al Jundi - HMC Regulation 28 Report (ref: 35218597)

Dear Mrs. Young,

please see below a statement on behalf of the Agglomerated Stone Manufacturers Association (A.St.A), in response to your enquiry sent on January 10th 2025. The statement can be attributed to [REDACTED], director of A.St.A.

Our association A.St.A. was formed in 2010 to promote Environmental Health and Safety standards among all members in the engineered stone industry, including the thousands of third-party fabricators that fabricate our products and other stone products in their workshops prior to their installation.

A critical safety issue in the stone fabrication industry is the requirement to follow well-established regulations and rules to protect workers from overexposure to respirable crystalline silica which can be generated during fabrication (e.g., cutting, grinding, and polishing) of stone products that contain crystalline silica. Regulatory bodies have established regulations and requirements to control silica dust and prevent overexposures to employees, and all employers who work on products containing silica must follow these standards.

While many fabricators care about this issue and follow the rules to protect their workers, there remains a need for increased compliance and enforcement activities to ensure that all stone fabrications workers are safe from respirable silica overexposure in their workplaces.

Unfortunately, recent years have shown an increase in prevalence of silicosis and other occupational pulmonary diseases among employees of stone fabricators. Silicosis is prevented through compliance with well-established safety regulations and requirements and it is essential that all fabrication employers ensure the safety of their employees at all times.

Many industry stakeholders have been working toward increasing awareness, compliance and enforcement of the safety regulations and requirements in the stone industry. Regulators, have made clear and simple rules (such as allowing only wet cutting) or have placed emergency standards with requirements aimed to improve compliance and increase enforcement. We and our members have been advocating for awareness, placing warning stickers, providing data sheets, creating educational materials all aimed to protect workers, and indeed many fabricators have invested behind the necessary equipment that allows them to completely protect their employees from this threat. Importantly, this is a workplace safety issue, not a product issue.

It seems that positively influencing such behaviors requires focused governmental involvement, and we are calling to consider the adoption of either clear and easy to follow rules, implement a licensing program for the fabricator's professions (similar to electricians, plumbers, and gas technicians) or of both. As example for clear rules, we would suggest considering requiring:



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- a. That all cutting tasks be performed using wet equipment and that no dry-cutting, dry-grinding or dry-polishing be allowed (manual or CNC)
 - b. Wet cleaning methods
 - c. Occupational review of the site and periodic air sampling
 - d. Medical surveillance
 - e. Mandatory training for employees

As for the proposed licensing program we believe following components should be considered:

- (a) Worker training required to obtain licenses,
- (b) Familiarity and implementation of environmental control measures (e.g., air testing) with on-site auditing by inspectors or outsourced authorized bodies,
- (c) Restrictions on fabrication of stone products without a license,
- (d) Prohibition against dry cutting, dry grinding, and dry polishing,
- (e) Prohibition to supply to or purchase from an unlicensed fabricator,
- (f) Appropriate enforcement and penalty provisions.

We remain at your disposal for any support you might need in this field.

Sincerely,

[Redacted signature]