

## Current Common Asbestos Practices in the ACT

### Licensing issues

1. Lack of suitable premises to conduct asbestos removal works.
  - Prior to the issue of a licence for asbestos removal, the premises of an asbestos removalist should be inspected for suitability by Work Cover.
  - The premises should be in an approved industrial area.
  - Should include a fully functioning decontamination facility, complete with negative air and showers.
  - Laundry facilities within the decontamination unit if reusable PPE is to be serviced i.e. clothing for friable asbestos removal.
  - Storage facility for containing asbestos waste prior to disposal at approved waste facility.
  
2. Currently no inspection of equipment and premises required prior to the issue of a licence.
  - Prior to the issue of a licence for asbestos removal, a licence holder or company should be audited for their asbestos removal equipment to certify that all plant, equipment and Personal Protection Equipment (PPE) meets the relevant Australian Standard.
  
3. Use of untrained employees i.e. have not received training in asbestos removal from an approved teaching facility.
  - All employees must attend an approved asbestos removal training course for the type of asbestos work being conducted, within the first three months of their employment in the industry.
  
4. Lack of required insurances i.e. workers compensation, public liability.
  - All insurances should be checked prior to the issue of a licence for asbestos removal. Sub-Contract removalist should not be allowed in the industry unless they hold an independent asbestos removal licence.
  - All employees should be covered by workers compensation as apposed to accident insurance as asbestos related diseases have a very long latency periods.
  
5. Prequalification for "A Class" Assessors not being met, i.e. 4 years in removal industry + 4 years supervisory experience in the asbestos removal industry.
  - Presentation of employment records with relevant work experience to be presented to licensing authority on application, as a "Class A" assessor is responsible for identifying all Asbestos Contaminated Material and for supervising the removal of friable asbestos.

## **Existing Asbestos Management issues**

1. Building certifiers without any Asbestos specific experience certifying asbestos removal works.
  - Only “A Class” assessors to be allowed to certify that Asbestos removal has been conducted in a compliant manner.
2. The lack of provision of Asbestos Management and Asbestos Removal Management Plans.
  - Asbestos Management plans, prepared by a “A Class” assessor including location and quantities of know asbestos with required control measures for removal should be provided at the request of the client to the Asbestos Removalist these plans should be submitted to Work Cover prior to commencement of work.
3. Asbestos Management plans inadequate in indicating the likely hood of existing asbestos so that appropriate precautions can be taken in “High Risk” activities.
  - Areas where asbestos may be contained must be detailed in the management plan to minimise the potential of exposure to ACM. All personnel working on “High Risk” areas should have “asbestos awareness” training.
4. Lack of education in asbestos awareness for major works contractors – Demolition-Refurbishment.
  - All employees of demolition/refurbishment companies should be trained in asbestos awareness within the first three months of commencing work as a part of their industry training.

## **Prior to Removal**

1. Decontamination facilities not meeting requirements of Asbestos Removal Code of Practice (NOHS2002(2005))
  - Code of practice to be made into regulation with regards to setup requirements for friable asbestos removal works. i.e. minimum of both a dirty and clean showers, not a single shower.
2. Lack of medical history register of employees in asbestos removal. i.e. Lung capacity tests and x-rays.
  - Work Cover to be responsible for auditing all asbestos employee records including training certification and health reports. This can be done by either;

- Companies submitting employee records to work cover on an annual basis; or
- Work Cover conducting random on site inspections of asbestos removal personnel records.

### **During Removal**

1. Inadequate Personal Protection Equipment (PPE) being used during Friable Asbestos removal i.e. less than P3 masks.
  - The "A Class" assessors supervising the works would audit the PPE before used to ensure compliance with the relevant legislation.

### **Post Removal**

1. Inadequate provision of decontamination facilities for servicing plant and equipment after asbestos removal.
  - Work Cover to inspect premises prior to the issue of licence to ensure these facilities are available.
2. Chain of custody for waste disposal.
  - All asbestos removal companies should provide copies of "chain of custody" detailing quantities and condition (friable/bonded) of asbestos removed from each site and the waste facility, at which it was deposited, to the client.
3. Specific laundry facilities designed for cleaning reusable clothing and PPE.
  - A laundry facility should be established within the decontamination facility of an asbestos removal company for the decontamination of PPE/ towels/ under-ware that was used during friable asbestos removal work.