

**Asbestos National
Strategic Plan**

Implementation
2019–23

Mid-term review of the Asbestos National Strategic Plan

2019/23



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Executive Summary

The National Strategic Plan for Asbestos Awareness and Management 2019-23 ([Asbestos National Strategic Plan](#)) includes undertaking a midpoint review to ensure the Plan remains focussed and effective in achieving the aim of eliminating asbestos-related diseases in Australia.

In undertaking this review, the Asbestos Safety and Eradication Agency (ASEA) analysed the Asbestos National Strategic Plan mid-term progress results. ASEA also sought feedback from the Asbestos Safety and Eradication Council and key stakeholders responsible for implementing the Asbestos National Strategic Plan and reporting on progress.

Key findings

- Overall, the review has found that the Asbestos National Strategic Plan remains an effective and necessary tool to coordinate asbestos actions nationally and within jurisdictions.
- The national priorities and their strategic actions all remain important and relevant, without any significant gaps.
- Of the four national priorities, Priority 1 on improving awareness receives the most attention, and this may divert resources away from actions that could be taken under the other national priorities – actions that will directly minimise or eliminate asbestos exposure risks.
- Improving awareness and effective coordination within jurisdictions should underpin all national priorities and strategic actions.
- Some strategic actions such as effective compliance and enforcement (in Priority 2) and improving the quality of training (in Priority 3) extend across a number of national priorities.

- ASEA’s research addresses many strategic actions, and this research can be used by governments to help them implement the Asbestos National Strategic Plan and improve asbestos policies and practices, thus saving time and money.
- Although governments have been slow in developing local asbestos action plans, reporting against the national targets has focussed attention on key elements of the Asbestos National Strategic Plan.
- Some of the targets have proven difficult to achieve by the end of 2023 and also difficult to interpret and measure – targets should be designed to be specific, measurable, achievable, relevant and time-based.
- The long-term nature of dealing with Australia’s asbestos legacy needs to be considered when setting national targets – a range of short, medium and long term goals may be more appropriate.

Given the term of the current Asbestos National Strategic Plan has less than 18 months remaining, the changes and improvements identified in this review will be considered in developing the third phase of the Plan.

The next Asbestos National Strategic Plan will also be informed by the final progress results and a socio-economic impact assessment of proactive asbestos removal options.

Introduction

The [Asbestos National Strategic Plan](#) was developed to ensure all governments across Australia work together to eliminate asbestos-related diseases by preventing exposure to asbestos fibres.

It has four national priorities underpinned by strategic actions. There are also nine national targets to measure progress over the life of the plan. The Asbestos Safety and Eradication Agency (ASEA) collects information, including from each jurisdiction, to measure and report annually on progress against the national targets.

The Asbestos National Strategic Plan includes a midpoint review to determine if changes are needed to the national priorities, strategic actions or targets. The results of this review are outlined in this report.

Review methodology

In undertaking this review, ASEA evaluated the national priorities and strategic actions to determine whether they remain relevant to achieving the aim of the Asbestos National Strategic Plan. The national targets were also reviewed to determine how well they align with the national priorities and how measurable and achievable they are.

This review was informed by:

- the findings of the mid-term progress report
- a targeted survey of Asbestos Safety and Eradication Council (ASEC) members and key stakeholders responsible for implementing and reporting on progress against the Asbestos National Strategic Plan, and
- an analysis of jurisdictional asbestos action plans.

The survey questionnaire sought feedback on:

- the relevance and importance of the national priorities in the Asbestos National Strategic Plan – with relevance defined as “whether this area requires action or attention in your jurisdiction or organisation” and importance defined as “the level of priority in your jurisdiction or organisation compared to the other national priorities”
- whether any strategic actions should be amended, removed or included
- how measurable and achievable each of the national targets are, and whether they could be improved, and
- the overall focus and effectiveness of the Asbestos National Strategic Plan.

Eleven responses to the survey were received, including from five government representatives and three union representatives.

National priorities and strategic actions

The Asbestos National Strategic Plan includes an expectation that signatories will, as far as possible, align their jurisdictional and local action plans with the national priorities and strategic actions.

At the time of preparing this report, Queensland has published its [Statewide Strategic Plan for the Safe Management of Asbestos in Queensland 2022-2025](#) and New South Wales has published an interim action plan ahead of developing a more comprehensive, longer-term strategy. Victoria and South Australia have draft action plans still to be approved. The Commonwealth has completed its action plan (not yet published).

ASEA's analysis of these plans is that they align with the national priorities of the Asbestos National Strategic Plan and, where relevant, are tailored to address specific local asbestos issues. For example, NSW has included dealing with asbestos in discreet Aboriginal communities and legacy asbestos fill sites as two of its priorities.

NSW and Victoria have also developed separate strategies addressing asbestos waste management:

- In June 2021, the NSW Government launched the [Waste and Sustainable Materials Strategy](#)
- In February 2021, Sustainability Victoria launched its [Asbestos Disposal Management Plan](#)

Successful implementation of the Asbestos National Strategic Plan relies on effective coordination within jurisdictions. Although most governments have established inter-agency coordination groups or committees, ASEA proposes that the next Asbestos National Strategic Plan include this as an underpinning element of the national priorities and strategic actions.

Priority 1: Improve asbestos awareness to influence behavioural change



Priority 1 aims to improve asbestos awareness by providing accurate, easily understood and timely information about the health risks of asbestos exposure to workers and the community.

Strategic actions under National Priority 1 include:

- producing targeted comprehensive and nationally consistent asbestos awareness advice and information campaigns for the community and workers
- producing additional practical information material on asbestos safety in the home, workplace and the environment
- improving education and training for those at risk of exposure to asbestos fibres or who make decisions about asbestos-containing materials (ACMs)
- establishing or maintaining trusted single sources of asbestos-related information at the national and jurisdictional level
- continuing to develop powerful awareness messages
- expanding and sharing research and information on asbestos-related diseases (ARDs) to improve policy and practice.

Review findings



Survey responses for Priority 1 show that improving asbestos awareness remains a high priority for stakeholders, being both highly relevant and important to pursue (Figure 1 in Appendix A).

Comments stressed the fundamental importance of awareness raising efforts, given that social research continues to show gaps in asbestos safety knowledge and behaviour in the community.

One respondent noted that their jurisdiction already has a high level of awareness about asbestos (having had in place for a number of years mandatory asbestos awareness training for tradespeople working with ACMs, asbestos disclosure requirements for residential property purchases and the buy-back program for properties affected by loose-fill asbestos insulation) but that information and awareness continues to be a critical national priority in supporting associated regulatory frameworks.

Survey respondents suggested additional actions for Priority 1, including:

- Improving awareness of workers who work in ACM built environments, given ACMs are now aged and deteriorating.
- Improving awareness of common exclusions of asbestos from insurance policies, which could leave property owners out of pocket in the event of property damage due to disaster events.

- Compulsory asbestos awareness training for high-risk industries and/or tasks.
- Establishing a national database as a central source of research and information including international asbestos-related work.

A key observation of the mid-term progress report is that numerous asbestos awareness activities are conducted by both government and non-government organisations, however the messages are not always consistent, well targeted or evaluated for their effectiveness. Research continues to show that, although homeowners and occupiers know asbestos causes cancer and other diseases, they do not always act safely when dealing with asbestos due to a lack of knowledge of where it can be found in the home.

This review has identified that a large amount of attention is placed on awareness raising which may divert resources away from actions that could be taken under the other national priorities – actions that will directly minimise or eliminate asbestos exposure risks. As an example, a government stakeholder noted it was spending approximately \$1 million on a major awareness campaign under Priority 1, but that resources to undertake a broad program of action under Priority 2 and 3 of the Asbestos National Strategic Plan were limited.

ASEA also devotes significant resources to awareness raising and conducted a large campaign for National Asbestos Awareness Week 2021 which demonstrated success across all evaluation measures. The tagline 'Think Twice About Asbestos' and key messages will be used in 2022 and beyond to build recognition, recall and knowledge among target audiences.

Conclusions

Research shows that ongoing effort is needed to improve asbestos awareness. However, there is a risk that because awareness activities are often easier to undertake than dealing with the asbestos materials themselves, awareness raising becomes the only action that is taken.

Given the recent clarification of ASEA's functions in relation to raising awareness, ASEA is best placed to conduct highly targeted and tailored awareness campaigns using the results of its surveys and other research, so that state and territory governments can dedicate more of their resources to asbestos identification, management, removal and disposal initiatives. This will also avoid duplication of effort and reduce the risk of inconsistent messages.

However, awareness raising alone will not prevent exposure to asbestos fibres. While the national strategic actions under Priority 1 all remain relevant, they should be considered 'business as usual'. Under the next phase of the Asbestos National Strategic Plan, improving awareness could be included as a supporting activity instead of a priority on its own.

Priority 2: Identification and effective legacy management



Priority 2 aims to improve the accurate identification of ACMs and ensure that they are maintained in a safe state until they can be removed.

Strategic actions under National Priority 2 include:

- identifying and promoting robust models for identifying and grading ACMs
- collaborating to develop a national picture of where ACMs are located in homes, commercial and public buildings, infrastructure and land
- promoting practical and effective information on how to stabilise and contain ACMs in homes, workplaces and the environment
- encouraging effective management of asbestos-contaminated land
- ensuring timely review and revision of emergency and natural disaster planning
- ensuring the provision of information about ACMs at point of sale for all homes, buildings, infrastructure and land
- improving and aligning asbestos-related legal frameworks
- ensuring effective compliance and enforcement of relevant laws by regulatory agencies.

Review findings



Survey responses for Priority 2 show that asbestos identification and management remains important for all stakeholders but was less relevant for some (Figure 2 in Appendix A), including one respondent who stated that significant actions had already been taken in their jurisdiction to identify and manage legacy asbestos. Another respondent noted that their government had to prioritise certain areas and communities for action due to resource constraints.

Suggestions relating to the strategic actions included:

- Compulsory labelling of identified ACM in residential and commercial properties.
- Information on risks that can be easily accessed by members of the community.

ASEA is addressing a number of strategic actions with the following projects:

- Developing national guidelines for conducting asbestos assessments to address the need for a robust and consistent approach in identifying and grading ACMs
- Supporting technological solutions to make the identification of asbestos more accurate in real-time through the Australian Government's Business Research and Innovation Initiative
- Development of a National Residential Asbestos Heatmap that shows the probability of asbestos presence by geographic areas across Australia

- Research that identifies options to improve the disclosure of asbestos in residential properties at point of sale or lease.

The strategic action relating to effective compliance and enforcement by regulators is not only relevant to Priority 2.

Conclusions

Governments should use ASEA's work to assist them implement the Asbestos National Strategic Plan.

The strategic actions under Priority 2 all remain important and relevant. The strategic action to ensure effective compliance and enforcement of relevant laws by regulatory agencies is a cross-priority action and also extends to Priority 3.

Priority 3: Safe prioritised removal and effective waste management



Priority 3 aims to encourage the development of schedules and processes for prioritised removal of ACMs based on risk, as well as improvements to ensure the safe transport, storage and disposal of ACMs.

Strategic actions under this priority include:

- improving the quality of asbestos-related training and ensuring effective oversight of licensing regimes
- ensuring existing tools for prioritising removal of ACMs are tested, promoted and used
- developing and sharing jurisdictional policies on prioritised removal of ACMs from government-owned and controlled buildings, land and infrastructure
- prioritising the removal of ACMs by commercial premise owners from buildings, land and infrastructure
- developing incentives to encourage the safe removal and disposal of ACMs from homes
- improving the accessibility and availability of waste disposal facilities for ACMs.

Review findings



Survey responses for Priority 3 show that safe prioritised removal and effective waste management remains highly important and relevant for most stakeholders (Figure 3 in Appendix A).

One respondent stated ‘We do not sense there has been any move towards prioritised removal’ and that action on ‘developing and sharing jurisdictional policies on prioritised removal of ACMs from government owned and controlled buildings, land and infrastructure’ should be amended to:

- removal of all ACMs from government owned and controlled buildings, land and infrastructure by 2030.

The mid-term progress report notes that for most governments, schools have been the focus of large-scale asbestos removal programs, and that governments are at different stages of maturity in relation to a systematic approach to asbestos removal – only a few have planned, prioritised removal schedules for their assets.

Other suggestions from survey respondents relating to the strategic actions included:

- More work is needed to achieve nationally consistent, high-quality training.
- Need a mechanism for renters to take action when damaged or deteriorating ACMs are not being attended to in their rented property.
- Strengthen penalties to further encourage safe removal from all commercial sites.
- Greater focus should be put on asbestos waste to address illegal dumping and to account for increasing natural disasters.

ASEA has developed options for improving asbestos safety training for workers entering trades and has also developed ways to address concerns about unlicensed asbestos removal.

In relation to asbestos waste, ASEA's research indicates that infrastructure for asbestos disposal is required for many decades to come. Although most jurisdictions have removed the waste levy for domestic loads of separated and wrapped asbestos waste and are implementing strategies to address illegal dumping, more focus is needed on what can be done to make asbestos waste disposal easier and cheaper, and effectively manage rising quantities of asbestos waste.

Conclusions

Safe prioritised asbestos removal and effective waste management remain essential national priorities in order to achieve the aim of the Asbestos National Strategic Plan. Without significant intervention, ACM stocks will decline to around 1 million tonnes by 2060 (declining at just above 10% per decade) and persist in the built environment beyond 2100.

The first phase of the [Asbestos National Strategic Plan 2014-2018](#) states that by phase three, a practical approach will be identified to address the ongoing risks posed by the remaining ACM in the built environment, and to support the removal of all remaining asbestos in poor condition or likely to pose a risk so far as is reasonably practicable.

ASEA is commissioning a socio-economic impact assessment of options to proactively remove ACMs which includes consideration of various incentives, to inform decisions on the type of actions that should be included in the next Asbestos National Strategic Plan.

ASEA is also developing a guide for local government to combat illegal dumping and improper disposal of asbestos.

Improving the quality of asbestos-related training in both the workplace and non-workplace sectors is an action that is not only relevant to Priority 3. Under the next phase of the Asbestos National Strategic Plan, strategic actions which extend across a number of priorities should be clearly identified.

Priority 4: International collaboration and leadership



The Australian Government is responsible for implementing Priority 4, having committed to international collaboration and leadership to help secure a worldwide ban on the production and trade of ACMs.

Strategic actions under this priority include:

continuing to present the Australian Government's position on banning asbestos mining, manufacture and use to relevant international bodies

sharing best practice approaches to asbestos awareness, management and eradication at international events

identifying and managing ACM importation risks through proactive international engagement

continuing education of the import supply chain to prevent ACMs entering Australia.

Review findings



Survey responses for Priority 4 show that international collaboration and leadership remains highly important and relevant for most stakeholders (Figure 4 in Appendix A).

Some stakeholders stressed the importance of international bans to prevent importation of products with ACM and called for the Australian Government to demonstrate more leadership in this area. Suggestions included:

- Proactive international engagement and involvement with relevant Australian agencies could be more formalised and structured, for example by establishing a specific taskforce/committee involving relevant agencies.
- Australia to lead and help fund the development of an international coalition body including governments and NGOs for the purpose of positioning a global ban on asbestos mining, manufacture and use to relevant international bodies.

Conclusions

International collaboration and leadership remain an essential national priority as it effectively mitigates against future legacy issues from ACMs.

Australia's system to manage ACM importation risks includes a permit process for asbestos imports and exports administered by ASEA, and enforcement of the asbestos import prohibitions by the Australian Border Force (ABF). A formal group has been established to rapidly address situations where prohibited asbestos products enter Australia. This group consists of the ABF, work health and safety regulators and the Australian Competition and Consumer Commission.

ASEA is strengthening its direct connections with governments in the South-East Asian region and continues to fund and support Union Aid Abroad-APHEDA's campaign to ban ACM production and use in these countries.

The national strategic actions under Priority 4 require ongoing attention and can be further refined in the next Asbestos National Strategic Plan.

National Targets

Nine national 'stretch' targets have been developed to focus on preventing exposure to asbestos fibres now and into the future. The 2023 targets aim to measure how effectively the Asbestos National Strategic Plan is being implemented.

ASEA developed a guide on [How to measure the targets under the plan](#) to assist jurisdictions in collecting and reporting data against the national targets. The guide explains what is being measured and what information and data is needed to determine progress.



The national targets are:

1. Increased awareness of the health risks of ACMs and where to source information:
 - a. all tradespersons whose work brings them into contact with ACMs
 - b. all workers in workplaces with ACMs
 - c. 80% of homeowners and occupiers, and
 - d. 80% of property managers and real estate agents.
2. All governments have identified and assessed the risks associated with ACMs in publicly owned and controlled buildings, land and infrastructure.
3. All jurisdictions have schedules and processes for the prioritised safe removal according to risk of ACMs from public buildings and infrastructure, and safe disposal of that material.
4. All regulators have in place and have implemented asbestos compliance programs.
5. All commercial buildings which are required by law to maintain asbestos registers, have up-to-date registers and management plans that are actively being implemented.
6. All regulators are investigating, prosecuting and penalising serious known breaches of asbestos-related laws including illegal waste disposal and importation.
7. Easier and cheaper disposal of asbestos waste.
8. Bans of asbestos production and use in South-East Asia and the Pacific have been influenced and progressed.
9. Develop an evidence-based national picture that assesses the likelihood of asbestos containing materials being present in the residential environment.



Review findings

A generally accepted rule is that targets need to be specific, measurable, achievable, relevant and time-based (SMART) to be effective.

The survey asked respondents to state whether the nine national targets were achievable and measurable in their jurisdiction. The survey also asked for suggestions to improve the targets and how they are measured. These questions were primarily aimed at government respondents who are asked to report on their progress annually.

One respondent noted that all the targets require long-term, ongoing work making it difficult to say that they could be 'achieved' by 2023, but that action has been taken in all target areas.

The mid-term progress report found that only three of the nine targets were likely to be achieved by the end of 2023, being targets 4 and 6 regarding compliance and enforcement activity and target 9 which relates to the National Residential Asbestos Heatmap developed by ASEA.

The data for measuring progress towards **target 1** is primarily drawn from national surveys conducted by ASEA.

Targets 2 and 3 focus on ACMs in government owned and controlled properties. Target 2 restates a legal requirement under WHS laws, but the guide on [How to measure the targets under the plan](#) explains that there are three key mechanisms by which this target is measured, including the extent to which asbestos registers are centralised and accessible. The mid-term progress report found that, although all governments reported identifying ACMs and assessing the associated risks in their assets for target 2, this process is mostly decentralised and managed at agency/departmental level.

Although target 2 can be achieved without a centralised system, having one allows better planning and prioritisation of asbestos removal at a whole-of-government level under target 3. Governments that do not have a centralised system for asbestos registers and risk assessments are finding it difficult to collect data and measure progress against targets 2 and 3.

Targets 4 and 6 focus on regulatory activities. Together, these targets recognise that an effective regulatory system consists of both proactive activities to encourage voluntary compliance (target 4) and reactive activities to penalise those who breach the laws (target 6), known as responsive regulation. The mid-term progress report found that all regulators are conducting asbestos-related compliance and enforcement activity. Arguably, targets 4 and 6 are not true targets because they simply reflect regulatory functions.

Target 5 relates to asbestos in commercial buildings, but it is also not a true target in that it restates a legal requirement. Although ASEA clarified that this target aims to measure the extent of compliance with WHS duties to maintain asbestos registers and management plans, which could be collected by WHS regulators as part of their compliance and enforcement activities, no information was submitted by governments against this target.

In relation to **target 7**, the mid-term progress report found that it is currently not possible to use a reduction in illegal dumping of asbestos waste as a measure for this target, because the scale of illegal dumping of asbestos across Australia and whether it is increasing or reducing cannot be fully assessed. Instead, it is more useful to focus on the strategies implemented by governments to address illegal dumping of asbestos waste and what is being done to make asbestos waste disposal easier and cheaper.

Data for **target 8** is primarily collected by Union Aid Abroad-APHEDA. While national asbestos prohibitions have yet to be implemented in the target countries, some progress has been achieved in Vietnam, Lao People's Democratic Republic, Indonesia and Cambodia.

To address **target 9**, ASEA recently completed the first National Residential Asbestos Heatmap which displays the likelihood that residential buildings within geographic areas in Australia contain asbestos, based on predictive modelling. The focus will now shift to how governments can use this information leading into the next phase of the Asbestos National Strategic Plan.

Conclusions

Although governments are still strengthening their asbestos data collection and coordination capabilities, the national targets have proven to be effective in focussing asbestos-related actions. The targets can be improved by ensuring they are specific, measurable, achievable, relevant and time-based.

Proposed improvements identified in this review are:

- Targets should be structured to align more closely with the national priorities and strategic actions
- Targets should not merely restate legislative obligations, rather they should aim to achieve best practice
- Targets for regulatory activities should be more meaningful
- The Asbestos National Strategic Plan should acknowledge the long-term nature of dealing with Australia's asbestos legacy and therefore short, medium and long-term targets should be set to ensure they are achievable.

As the term of the current Asbestos National Strategic Plan has less than 18 months remaining, ASEA proposes that changes and improvements identified in this review be considered in developing the third phase of the Plan. In the meantime, ASEA will amend its guide on how to measure the national targets to clarify the relationship of the targets to the national priorities.

Appendix A: Survey results

Survey respondents were asked to rate the relevance and importance of the national priorities in the Asbestos National Strategic plan as either high, medium or low, with relevance defined as “whether this area requires action or attention in your jurisdiction or organisation” and importance defined as “the level of priority in your jurisdiction or organisation compared to the other national priorities” the results are displayed below. None of the priorities received a low relevance or importance rating.

Figure 1: Number of respondents providing views on National Priority 1

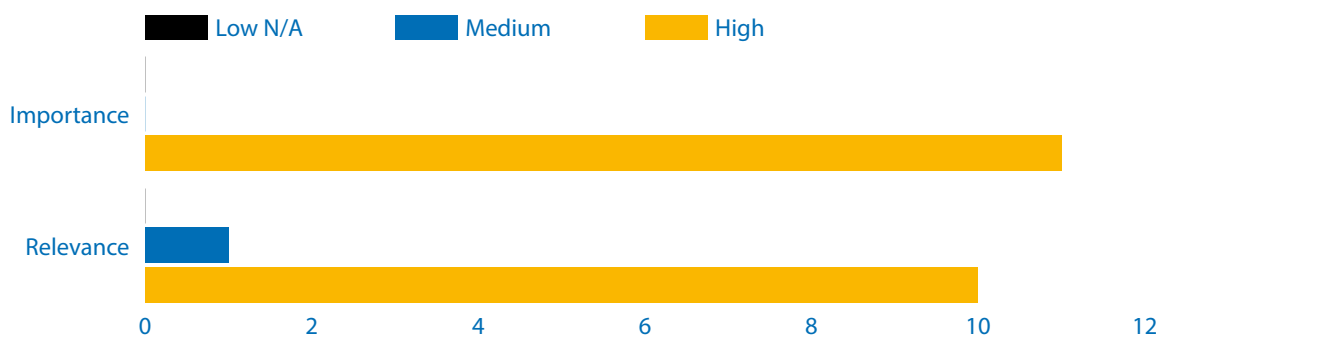


Figure 2: Number of respondents providing views on National Priority 2

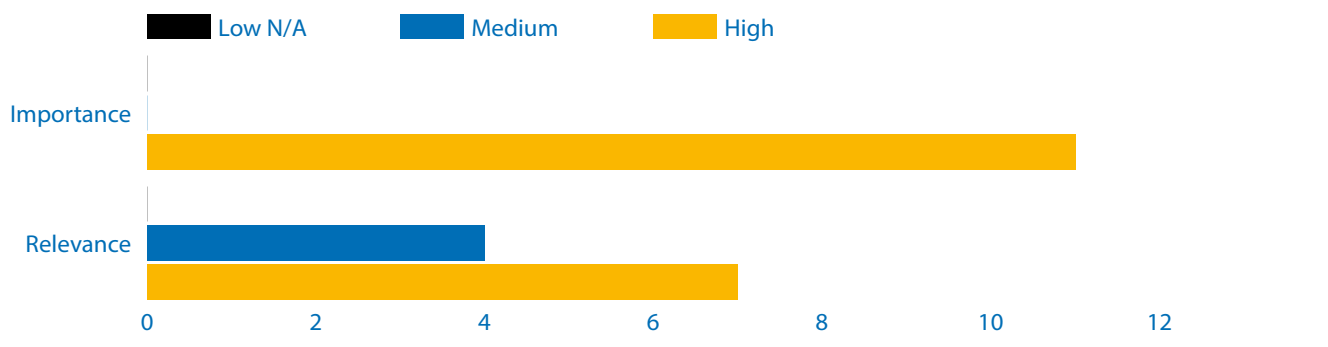


Figure 3: Number of respondents providing views on National Priority 3

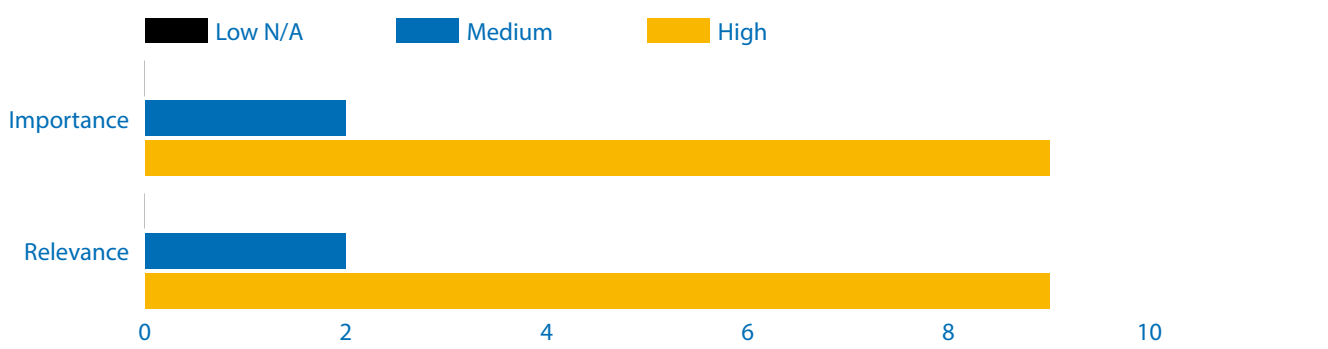
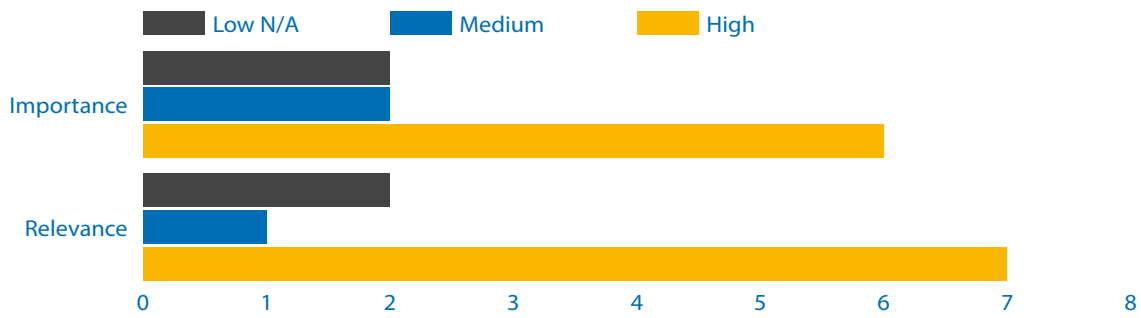


Figure 4: Number of respondents providing views on National Priority 4



Not applicable was included as an option on National Priority 4 as the Commonwealth is primarily responsible for its implementation.