



Australian Government

Asbestos Safety and Eradication Agency

Action on illegal disposal of asbestos

**A Guide for Local
Government**

SUPPORTING INFORMATION

Research

This Guide was a collaboration between ASEA and Heartward Strategic. The Guide is based on information collected on council interventions across Australia and research involving 173 councils via:

- Open online survey - 86 individual councils, and 6 regional authorities representing 25 councils (noting most participating councils chose not to be identified)
- Desktop research - a review of all council websites, garnering information from materials and resources on an additional 51 individual councils, and 2 regional authorities representing 11 councils
- Interviews - in-depth discussions with 20 local government representatives chosen from councils who participated in the online survey

Table 1 below provides an overview of the coverage of the research by local government area (LGA).

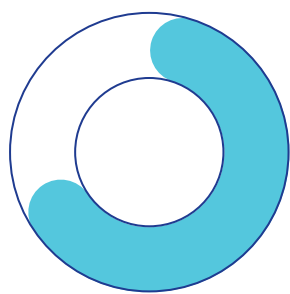
Table 1. The population served by local governments included in the research	Number	% of Australian population
Australian population (Census 2021)	25,422,788	
Population represented by survey respondents (LGAs)	5,707,629	22.4%
Population represented by survey respondents and desktop research (LGAs)	13,147,231	51.7%

The research undertaken to inform this guide provides a snapshot of how councils across Australia are currently meeting the complex issue of asbestos safety and illegal disposal of ACMs. Key findings¹ from this research are summarised below.

As shown in Figure A:

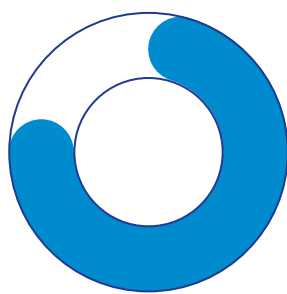
- **Most consider illegal asbestos disposal to be a significant issue.** Of the 92 local government bodies who responded to the survey, 71% reported it to be of moderate, high or very high significance to their council.
- **Most local government bodies are already acting in this space.** Four in five (80%) responding to the survey reported having interventions currently underway to manage illegal asbestos disposal.
- **Three in five (61%) reported having workers dedicated to responding to illegal asbestos disposal.** These local government bodies were more likely than those without dedicated workers to be undertaking interventions, with some pointing to the availability of dedicated workers as a key success factor in sustained and impactful interventions.

FIGURE A
Participating local government bodies' engagement with illegal asbestos disposal interventions



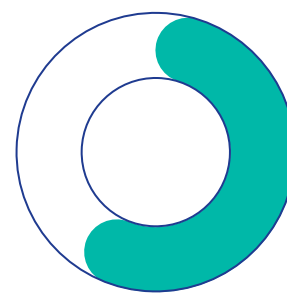
71%

of participating LGAs consider illegal asbestos disposal to be of **moderate, high or very high significance** to their council



80%

of participating LGAs are **currently undertaking interventions** to manage illegal asbestos disposal risks



61%

of participating LGAs have **workers dedicated** to illegal dumping and/or asbestos waste

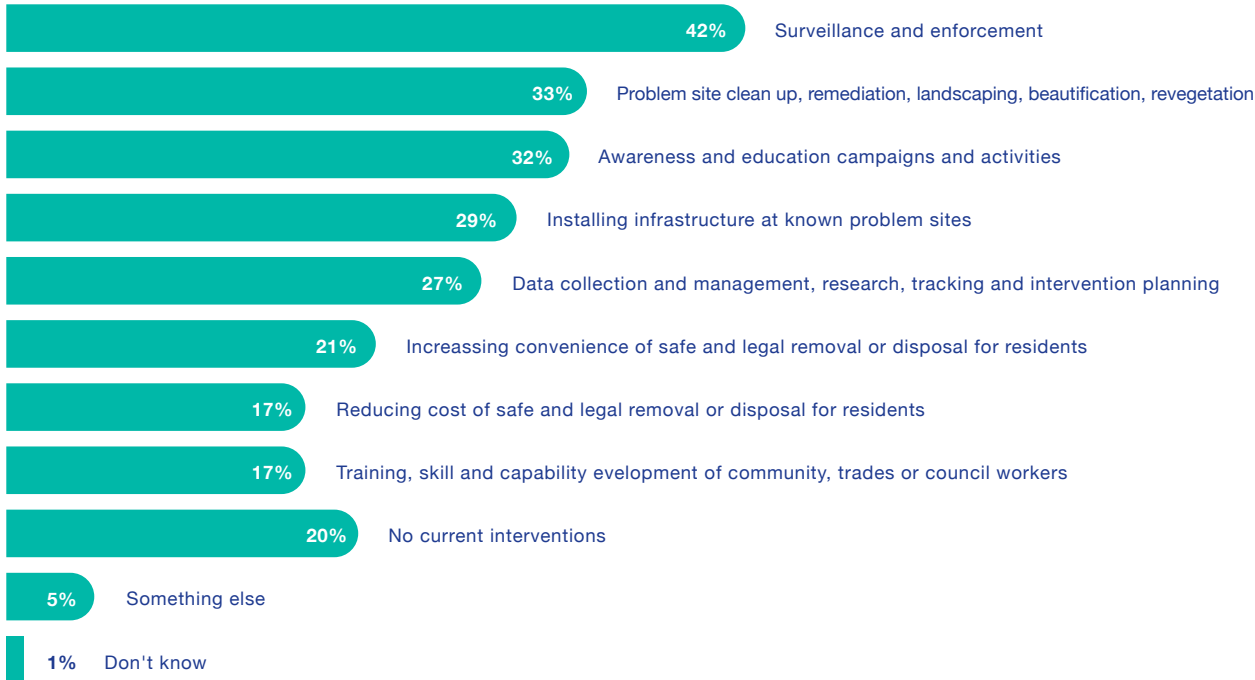
¹ Wherever possible, the source of research findings - survey, desktop research, interviews - is noted.

Representatives responding to the survey reported that their local government bodies are currently engaged in a range of different types of interventions for illegal asbestos disposal, as shown in Figure B.

The three most common interventions included:

- **surveillance and enforcement** (including cameras, patrols, drones and investigations)
- **clean-up of hotspots** to discourage further illegal disposal
- **awareness and education** campaigns and activities.

FIGURE B
Participating local government bodies' current illegal asbestos disposal interventions



Although less commonly reported as being currently undertaken, **interventions that make it easier for people to safely and lawfully dispose of ACMs (by increasing convenience or reducing cost) were perceived as particularly effective in managing illegal asbestos disposal and its risks**, as shown in Figure C. The proportion considering awareness and education campaigns and activities to be particularly effective (62%) far outweighed the proportion currently employing this type of intervention (32%, see Figure B).

FIGURE C
Interventions perceived as most effective in managing illegal asbestos disposal and its risks

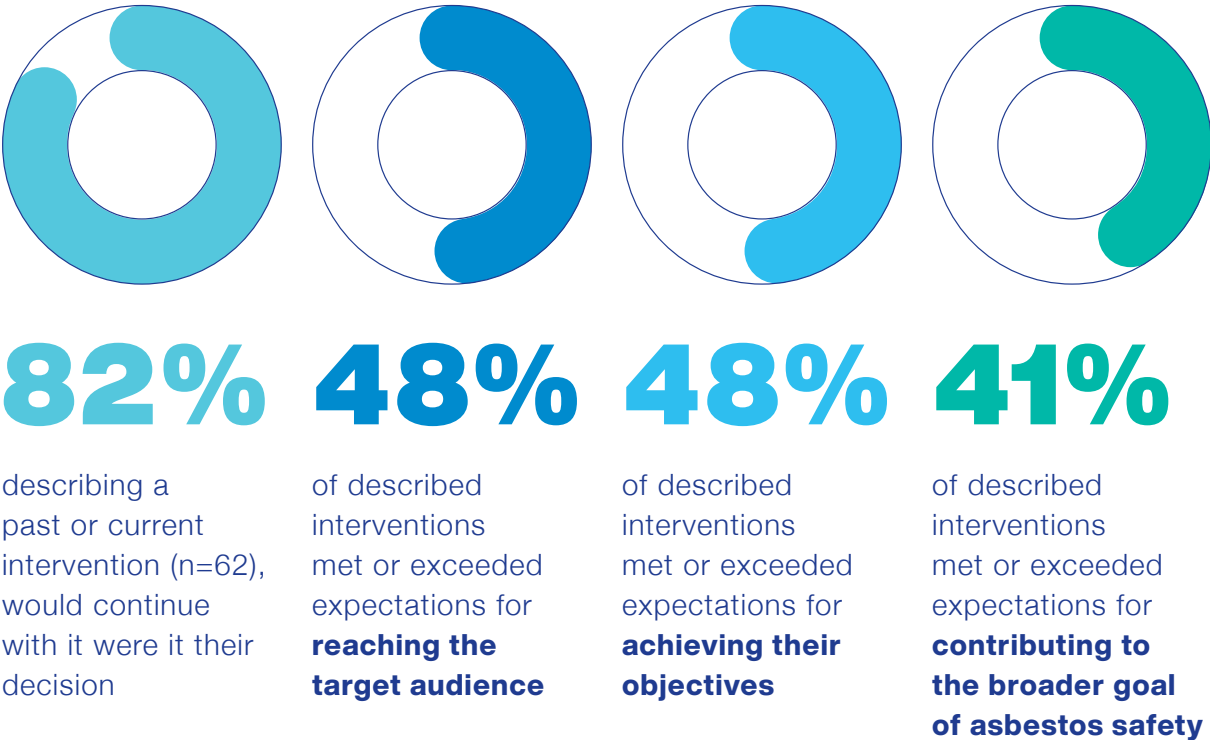


Among the representatives responding to the online survey, 62 chose to share the details of a relevant intervention (current or past) that has been implemented by their local government body. As shown in Figure D, of these:

- Around **half (48%) felt the intervention had met or exceeded expectations** in reaching its target audience and in achieving its objectives, and 41% felt it had met or exceeded expectations for contributing to asbestos safety.
- Just **23% had formally evaluated** their intervention though the vast majority (82%) indicated that they would want to continue this intervention into the future, suggesting they saw clear benefits.

Some representatives were able to reflect on ways that their council’s interventions could have been strengthened, or their impact increased through other complementary activities.

FIGURE D
Outcomes of described interventions

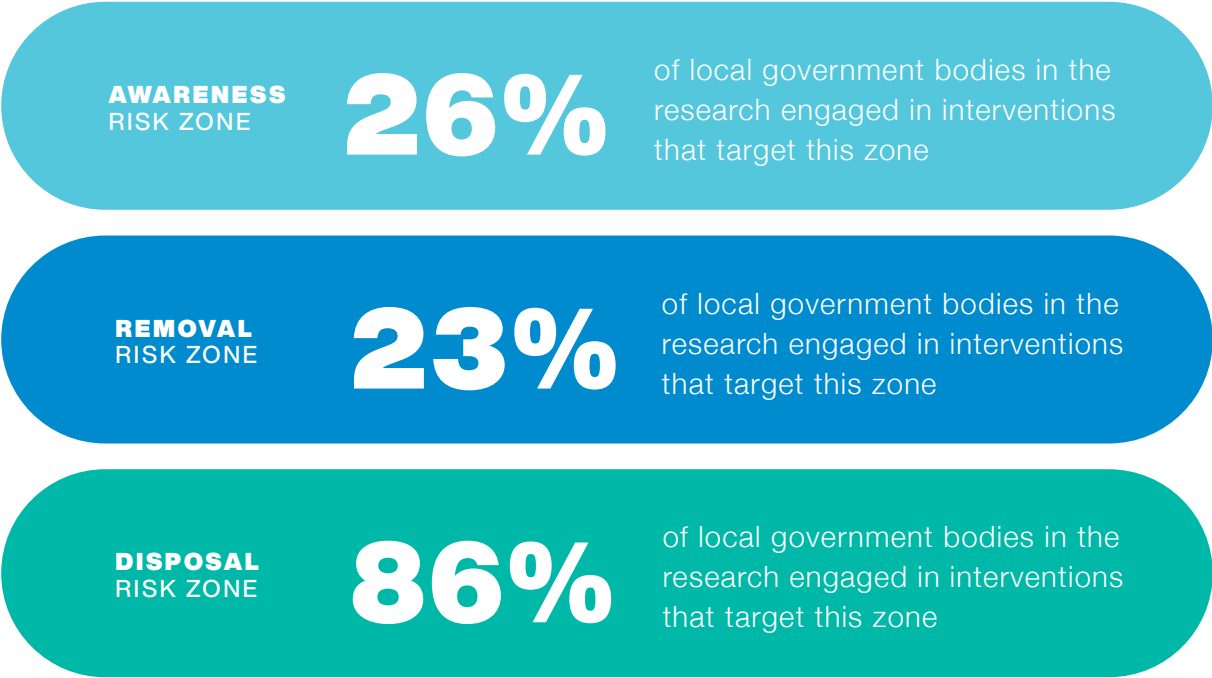


Of the local government bodies with relevant illegal asbestos disposal interventions (identified in the survey or through desktop research):

- **The large majority were focused on the disposal risk zone.** Specifically, 86% of the local government bodies with any relevant interventions had activities focused in this zone. Only around one quarter had activities that were focused on the awareness or removal zones of the asbestos waste journey (see Figure E). Most interventions were aimed at addressing:
 - **physical opportunity barriers** by supporting people to engage in the right actions (64% of local government bodies had interventions directed here)

- **psychological capability barriers** by boosting asbestos-knowledge awareness (53%).
- Attention was less commonly directed towards social opportunity barriers (by setting and reinforcing appropriate expectations, 36%), motivation barriers (by addressing unconscious enticements, 1%, or conscious excuses, 23%) or physical capability barriers (by boosting skills, 9%).
- These findings suggest an **opportunity to increase interventions in the awareness and removal risk zones** to prevent downstream impacts of illegal asbestos disposal. A fundamental rethink towards preventative actions is worth consideration.

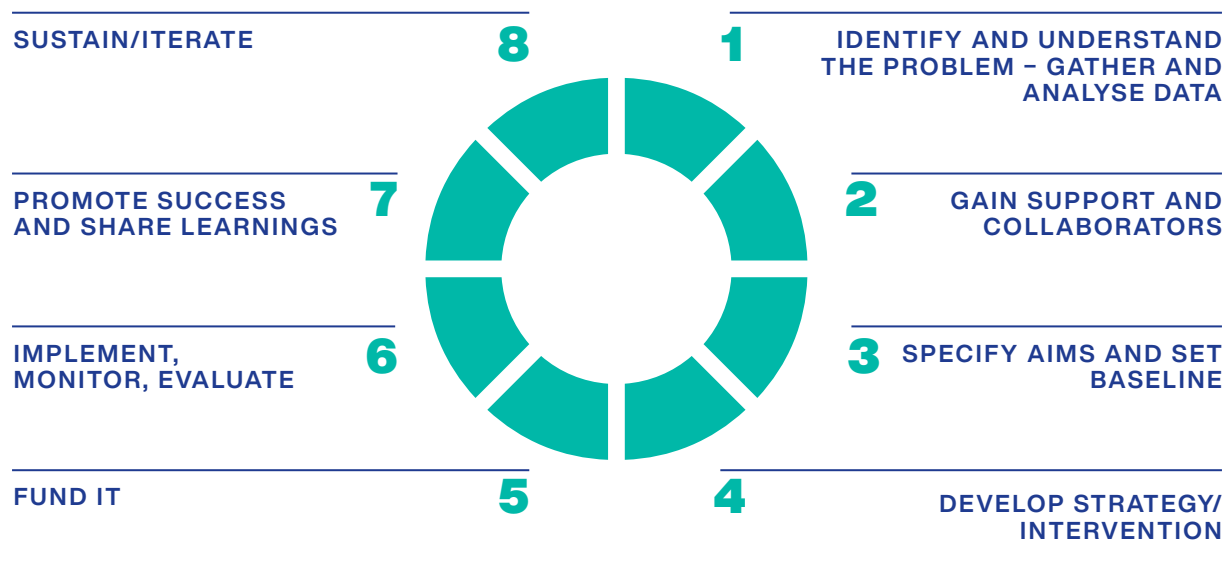
FIGURE E
Illegal asbestos disposal interventions in each risk zone



How to develop an illegal asbestos disposal strategy

The following framework guides councils on how to develop an illegal asbestos disposal strategy, irrespective of whether illegal asbestos disposal is managed as part of other strategies (e.g. asbestos management or waste management) or separately.

Best practice steps to develop an illegal asbestos disposal strategy



1.

Identify and understand the problem at the local level

It is important to know:

- how common ACMs are in local building stock
- volumes of asbestos waste disposed of legally and illegally in the local area
- clean up and remediation costs of illegal asbestos disposal
- likely levels and points of exposure in the community
- what existing and recent past council activities have addressed illegal asbestos disposal.

— Gather data

To avoid making assumptions that underestimate risk or misdirect resources, it is important to rely as much as possible on objective evidence and data, rather than anecdotal evidence or individuals' observations.

Before designing new ways of collecting data, audit and analyse existing sources of robust and objective data, such as:

- resident reports/complaints
- incident records
- ranger patrol records and notes
- penalty and clean up notices
- local court records of cases and convictions
- clean-up costs
- mapping of dumping hot spots
- waste site records
- community and stakeholder research/surveys
- council demographics
- surveillance footage
- photographs and statistics and information from publicly available reports (e.g. from ASEA, state governments and other bodies)

You may also benefit from conducting an asbestos awareness survey among community members and/or associated professionals to determine if knowledge, awareness and capability gaps exist.

— Analyse data

Well-analysed and clearly presented data showing the extent of identified illegal asbestos disposal-related issues in the local area can support a business case for developing a strategy and the allocation of resources to implement it.

2.

Gain support and collaborators

Early engagement with all relevant stakeholders, both internal and external, can ensure ongoing support for intervention and access to information and resources to sustain a program over the longer term.

Conducting a simple stakeholder mapping exercise can help develop a plan to engage stakeholders. This process will reveal potential stakeholders from whom councils may gain useful perspectives and future partnerships, such as local builders, hardware stores, building industry peak associations, planners, building inspectors, unions, TAFE Colleges, universities, historical societies, resident associations, and environmental groups.

This will also help identify existing competencies within the council team, as well as gaps where capability could be built. Councils identify that multidisciplinary teams can be effective in taking action on illegal asbestos disposal, with possible contributors including workers across waste management, strategic planning, community health, environmental management and communications.

Many councils suggest that strong collaborative partnerships, within and across council functions, with neighbouring councils and with local and regional organisations, leads to more successful interventions that benefit from:

- in-kind contributions
- idea and intelligence sharing
- reduction in duplication of efforts
- cost-reduction or cost-sharing

3.

Specify the aims/objectives and set a baseline

Work with internal and external stakeholders to define the objectives of the strategy (or specific intervention), spelling out what it aims to achieve. Objectives that are SMART (simple, measurable, realistic, achievable and timely) are more likely to be achieved and enable the strategy to be effectively evaluated (Step 6, below).

Step 1 provides a clear baseline of the problem against which changes can be measured to determine if the strategy (or specific intervention) is achieving its objectives. If available data does not align with the objectives, it may be necessary to gather more specific baseline data.

4.

Develop the strategy/intervention

The outcome of this step is a documented strategic plan or intervention plan that clearly identifies:

- the details of the illegal asbestos disposal-related issue being addressed
- the relevant audience/s for activities under the strategy (e.g. residents, ratepayers, trades, workers, waste site users)
- at what parts of the asbestos waste journey the strategy is aimed, noting the importance of including proactive, preventative measures

- what audience behaviours need to be changed and/or reinforced and how the strategy or intervention will do this (i.e. what behavioural barriers/levers the strategy/intervention will address, noting also recommended approaches to managing risks under work health and safety laws)
- how it will be implemented, how long it will take, how much it is expected to cost and who will implement and monitor it.

Co-creating strategies and interventions with stakeholders, collaborators, and even members of the target audience, can be very effective.

5.

Fund it

Councils suggest that the most successful, long-term initiatives are those that have a sustainable, secure funding base and dedicated human resources. Councils assert that positive outcomes can be achieved with a modest resource investment. Examples of funding approaches and sources include:

- rebalancing funding priorities across illegal asbestos disposal clean up, enforcement and prevention
- redirecting infringement or other council income to fund prevention activities
- reinvesting income from interventions that generate income (e.g. RID squads)
- forming partnerships, including multi-council regional collaborations, to fund and implement waste-related activities requiring larger investments
- receiving local business donations and in-kind support
- through grants from state environmental agencies.

If grant funding is sought, councils could reach out to colleagues or other councils, or seek professional guidance to support the submission of grant applications.

Other cost-effective approaches include adapting existing concepts and materials available from government agencies or other councils, and amplifying wider state-based asbestos awareness campaigns. There is no need to ‘reinvent the wheel’ as far as targeted awareness materials are concerned – the Asbestos Safety and Eradication Agency has developed [materials](#) for a variety of audiences that are ready to use and tailor to your council’s needs.

6.

Implement, monitor and evaluate

Implementing the strategy or specific intervention means putting documented plans into action, while maintaining some flexibility to adapt to unforeseen circumstances.

Ongoing monitoring helps to:

- identify and respond to change in a timely way
- ensure the plan remains on time and budget
- ensure that it is achieving what it set out to do.

Monitoring is also important because it provides the objective evidence to demonstrate the outcomes and value delivered by strategies and interventions, which enables success to be promoted and assists in building a case for further roll-out, funding and support. Objective evidence can put negative feedback in context and be used to address concerns or reservations. Evaluation should draw

on monitoring data to assess whether the activity **met its objectives** (evaluating the outcomes) and also **how well it was delivered** (evaluating the process) by asking:

1. Did it meet its objectives? To what extent?
2. Was it delivered on time and on budget?
3. What went well and what did not?
4. What could be done better in future and/or what should be done next?

Independent evaluation is best practice for determining if a strategy, policy, plan or intervention has achieved its goals, but this can be too much for council resources. Evaluation is not necessarily costly if monitoring/data collection is built into the strategy or intervention design. Also consider integrating the evaluation into existing reporting mechanisms and cycles (such as, health and wellbeing plans, council vision statements, and budgets) to support monitoring and resource allocation.

Note that any action is likely to reduce exposure-related harm and save lives, but measuring the impact of a specific strategy or intervention on eventual health outcomes is not practical due to the time lag in asbestos-related disease onset. This does not invalidate the importance of monitoring other indicators of the impact of council’s asbestos actions that appear:

- well before risks occur (leading indicators) such as:
 - levels of community awareness of the requirements, processes and relevant professionals relating to asbestos
 - levels of planning for encountering and disposal of ACMs by people engaging in work where they may be found
 - traffic or downloads of relevant information on council’s website

- at the time or after risks occur (lagging indicators) such as:
 - number of waste workers exposed to illegal asbestos disposal
 - the number or volume of incidents
 - the volume or frequency of ACMs appearing in household waste
 - annual clean-up costs for council

7.

Promote success and share learnings

Once we understand whether the strategy or specific intervention has performed against its objectives (and where and why it hasn't) we can celebrate any successes and promote this to stakeholders, through local media and on the council website to

- acknowledge and motivate workers
- increase the chance of further resources being made available to sustain the program
- communicate key messages to the local community, increasing consideration of asbestos, and the safe and lawful removal, handling and disposal of ACMs

Others facing similar challenges can learn from your experience, particularly if shared through professional networks and events, such as the local government association in your state or territory.

8.

Sustain/iterate

The final step is to incorporate learnings from the monitoring and evaluation to ensure the impact of activities is sustained through further roll-out of the activity, with adjustments if needed, or through additional or new interventions that build on the improved baseline that has been reached.

Resources

NATIONAL

Asbestos Safety and Eradication Agency (ASEA)

www.asbestossafety.gov.au/

www.asbestossafety.gov.au/who-contact/search-disposal-facilities

www.asbestossafety.gov.au/find-out-about-asbestos/asbestos-safety-information/brochures

www.asbestossafety.gov.au/find-out-about-asbestos/asbestos-safety-information/factsheets

www.asbestossafety.gov.au/national-asbestos-awareness-week-2022

SafeWork Australia

www.safeworkaustralia.gov.au/

www.safeworkaustralia.gov.au/law-and-regulation/duties-under-whs-laws/duties-pcbu

www.safeworkaustralia.gov.au/doc/model-code-practice-how-manage-work-health-and-safety-risks

<https://www.safeworkaustralia.gov.au/doc/model-code-practice-how-manage-and-control-asbestos-workplace>

<https://www.safeworkaustralia.gov.au/doc/model-code-practice-how-safely-remove-asbestos>

Department of Climate Change, Energy, the Environment and Water

www.dcceew.gov.au/

Australian Local Government Association

alga.com.au/

Australian Services Union

www.asu.asn.au/

AUSTRALIAN CAPITAL TERRITORY

Asbestos in the ACT

www.loosefillasbestos.act.gov.au/asbestos-awareness-and-safety

Worksafe ACT

www.worksafe.act.gov.au/

NEW SOUTH WALES

Asbestos in NSW

www.asbestos.nsw.gov.au/

SafeWork NSW

www.safework.nsw.gov.au/

NSW Environment Protection Authority

www.epa.nsw.gov.au/

www.epa.nsw.gov.au/your-environment/household-building-and-renovation/dealing-with-household-asbestos/social-research-to-improve-asbestos-management

Local Government NSW

www.lgnsw.org.au/

NORTHERN TERRITORY

Asbestos in the NT

asbestos.nt.gov.au/

Northern Territory WorkSafe

worksafe.nt.gov.au/

Northern Territory Environment Protection Authority

ntepa.nt.gov.au/

Local Government Association Northern Territory

www.lgant.asn.au/

QUEENSLAND

Queensland Government – Asbestos

www.asbestos.qld.gov.au/

WorkSafe Queensland

www.worksafe.qld.gov.au/

Queensland Department of Environment and Science

environment.des.qld.gov.au/

Local Government Association Queensland

www.lgaq.asn.au/

SOUTH AUSTRALIA

South Australian Government – Asbestos

www.asbestos.sa.gov.au/

SafeWork SA

www.safework.sa.gov.au/

Environment Protection Authority SA

www.epa.sa.gov.au/

Local Government Association SA

www.lga.sa.gov.au/

TASMANIA

WorkSafe Tasmania

worksafe.tas.gov.au/asbestos

Environment Protection Authority Tasmania

epa.tas.gov.au/pages/default.aspx

Local Government Association Tasmania

www.lgat.tas.gov.au/

VICTORIA

Asbestos in Victoria

www.asbestos.vic.gov.au/

WorkSafe Victoria

www.worksafe.vic.gov.au/

Environment Protection Authority Victoria

www.epa.vic.gov.au/

Municipal Association of Victoria

www.mav.asn.au/

Victorian Government Solicitor's Office – The General Environmental Duty under Victoria's new environmental regulatory regime

www.vgso.vic.gov.au/general-environmental-duty-under-victorias-new-environmental-regulatory-regime

Western Australia Government – Asbestos FAQs

www.commerce.wa.gov.au/worksafe/asbestos-frequently-asked-questions

WorkSafe WA

www.commerce.wa.gov.au/worksafe

Environmental Protection Authority WA

www.epa.wa.gov.au/

WA Local Government Association

walga.asn.au/

OTHER RESOURCES

Asbestos and Hazardous Materials Consultants Association

ahca.org.au/

Australian Institute of Occupational Hygienists

www.aioh.org.au/resources/consultants/

Faculty of Asbestos Management of Australia and New Zealand

<https://famanz.org/>

Waste Management and Resource Recovery Association Australia

www.wmrr.asn.au/

Aboriginal and Torres Strait Islander communities

WasteAid Australia co-designs and co-implements sustainable waste solutions in Aboriginal communities, creating partnerships that embrace each community's unique skills and expertise to manage sustainable long-term solutions with Aboriginal people on their own land.

wasteaid.org.au/

Local government area demographics

Demographic information for your local government area is available through ABS QuickStats.

www.abs.gov.au/census/find-census-data/search-by-area

Regional illegal dumping squads

Some councils have joined together to establish regionally based teams that specialise in combating and preventing illegal disposal through jointly fund illegal dumping enforcement teams, such as NSW RID.

www.epa.nsw.gov.au/your-environment/litter-and-illegal-dumping/prevent-illegal-dumping/regional-illegal-dumping-squads

**If you have any comments or
contributions to this guide,
please email**

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