



Submission Template | Asbestos Safety Training Options for Workers Entering Trades

Submission from: The ACT Regional Building and Construction Industry (CITC)

Responses to questions posed:

1. Do you agree that asbestos awareness training is required *before* apprentices are at any risk of asbestos exposure? If so, what training do apprentices need?

Yes, all Apprentices are at risk of asbestos exposure.

All Apprentices should be provided with the knowledge and skills through appropriate accredited training to identify asbestos containing materials. At the end of the training, participants should be able to make an informed decision that asbestos containing material is present and also have the knowledge to report it to an appropriate person and/or authority.

2. While all WHS laws impose duties on PCBUs (or equivalent) to provide training, they are not prescriptive about what training needs to be undertaken or who can provide that training, apart from the ACT. Do these laws provide adequate protection to workers at risk of being exposed to asbestos? If not, how could they be improved?

No, these laws do not provide adequate protection to workers at risk of being exposed to asbestos.

Adapt the ACT Model.

3. In your state or territory do the current asbestos training provisions in WHS regulations and codes provide enough information to determine what 'suitable and adequate' training means for asbestos related jobs?

No.



4. If further prescription about training is desirable, are there particular occupations which should be targeted (see for example the list at Appendix 1 setting out the occupations listed under the ACT legislative scheme).

Training may vary depending on the type of work being undertaken. This would include: new entrants; Maintenance workers; Asbestos removalists, Supervisors; Managers

5. Is nationally recognised training generally preferable to non-accredited courses to meet PCBU duties for workers entering trades who may be exposed to asbestos? Why?

Yes.

Nationally recognised training must go through a rigorous process including industry consultation. Additionally, it must be delivered by a Registered Training Organisation and the Certificate that is issued has national portability. This gives the PCBU certainty on the quality of the training and allows them to engage employees from other States and Territories.

6. Do some PCBUs find choosing asbestos training difficult given the range of choice and the need to ensure training meets duties under WHS laws? Why? Do small businesses face any particular challenges in this regard?

The wide range of training available varies considerably with over 124 Asbestos Awareness Courses available over the internet. PCBUs have no guidance on what is good and what is bad plus they do not know if it meets what Regulators require. The ACT model is an exemplary model as ALL PCBUs have a clear understanding on what their responsibility is and what is the appropriate training needed for them to meet their obligations.

Small businesses usually have bigger issues as they do not have the number of resources as large companies to research and search what and where they can go to find the appropriate Course and the appropriate RTO



7. Which of the options at 6.1 – 6.5, if any, do you support or not support and why? (You may wish to rank the options in order of preference).

6.1 Maintain the status quo (No)

6.2 Work with industry to add a core unit of competency for asbestos safety awareness.

6.3 Increased encouragement from WHS regulators to choose specific training (Yes)

6.4 WHS regulators to approve asbestos awareness courses and training providers (Yes)

1.5 Adoption of mandatory asbestos safety training requirements (the ACT model)

8. Are there other levers which could be used to ensure all workers entering trades who may be exposed to asbestos receive adequate asbestos safety training?

Introduce a national legislative framework mandating approved training for Asbestos Awareness. The ACT has introduced an exemplary model for adaption nationally through WorkSafe ACT.

9. Are there any other issues you would like to comment on regarding the adequacy of asbestos safety training especially for workers entering trades where they may be exposed to asbestos?

Individuals need to understand that Asbestos is contained in a vast range of products and materials. These products and materials are varied and often invisible to the naked eye.

In a workplace environment a worker and PCBU need to be able to understand a wide range of working contexts where they could be exposed to Asbestos containing materials

Regulators should address the issues around Building Codes where currently a number of Jurisdictions still include the clause of '**Less than 10sm Rule**' where individuals can remove **less than 10sqm of Asbestos Containing Materials** without any formal training.

PCBUs accept that people undertaking this work should be trained but there is **no** current requirement, except for the ACT, for this to apply.

A wide range of **accredited/endorsed** training needs to be available for the following workers:

1. **Apprentices** need to undertake the full suite of **accredited/endorsed** courses explicit to their trade but **must undertake the** Asbestos Awareness Course, as a minimum, where they should be provided with the relevant skills and knowledge to be able to identify Asbestos Containing Materials and then know where and how to report it.



2. As a principal **ALL** workers should be able to be trained in the identification and recognising the wide range of ACMs and also know how and why it needs to be reported to a relevant person.

PCBUs

PCBUs need to comply with all relevant Legislation and Regulation for working with ACMs and the vast majority of PCBUs seek advice and assistance from State and Territory Regulators in regard to complying with ALL regulatory requirements for keeping their workers safe

PCBUs understand that they need to provide appropriate training for their employees and the only way that this can be satisfied is for their workers to undertake nationally accredited/endorsed training and RTOs delivering this training should be approved by the relevant State or Territory Regulator. This is not an ASQA Audit, the Audit is needed to ensure that the RTO delivering these Asbestos related Courses has the capability to deliver and has the appropriate resources.

We need to remember that over 120 Non accredited Asbestos Training Courses can be obtained over the internet that add little to Nil value to people undertaking these Courses.

TRAINING

ALL training should be nationally accredited or nationally endorsed and delivered by a Registered Training Organisation.

Regulators should engage proactively by implementing a system for approving RTOs to deliver each of the Courses. This is important as a number of Jurisdictions have a Licensing outcome for some of this work.

Training should cover a number of situations including:

1. The ability to make an informed decision in identify Asbestos Containing Materials (ACM) and additionally, reporting to a delegated person that ACM is present.
2. Workers that may come into contact with ACM when undertaking work with less than 10sq. m of ACM present (usually asbestos sheeting).
3. Maintenance workers that have a requirement to drill and cut into ACM (asbestos sheeting) when undertaking repairs and maintenance.
4. Asbestos Removalists (Licensed work) who physically remove both friable and non-friable ACM.
5. Supervision/Management of projects that may contain ACM.

ENDS.