



**LVAT**

**Latrobe Valley  
Asbestos Taskforce**

# **ASBESTOS SAFETY TRAINING OPTIONS FOR WORKERS ENTERING TRADES**

Submission to the  
Asbestos Safety and Eradication Agency

December 2021

## About the Latrobe Valley Asbestos Taskforce

The Latrobe Valley Asbestos Taskforce (“the Taskforce”) was commissioned by the Victorian Government in 2019 to undertake a review into how asbestos is managed in the Latrobe Valley, including the safe identification, handling and disposal of asbestos across industrial, commercial and residential sites and locations.

The Taskforce brings together a diverse range of stakeholders including state agencies, local government, workers’ representatives and community groups. It aims to bring about consistency, collaboration and improved community engagement and awareness for the management of asbestos.

As detailed in the Terms of Reference<sup>1</sup>, the four key functions of the Taskforce are to:

1. **Enquire into and report to Government** on current asbestos waste handling processes and safety practices within the public and private sector.
2. **Design a plan** for the management, demolition, transportation and disposal of asbestos for all Latrobe Valley sites and locations.
3. **Make recommendations to Government** on the way asbestos waste material will be dealt with in a formal and consistent manner.
4. **Engage with and inform** the community and industry in the Latrobe Valley on the work and progress of the Taskforce.

The Taskforce has a four-year duration and will culminate in March 2023. The Independent Chair of the Taskforce is the Latrobe Health Advocate, Jane Anderson. The Taskforce member organisations are:

- Department of Environment, Land, Water and Planning
- WorkSafe Victoria
- Environment Protection Authority
- Department of Families, Fairness and Housing
- Sustainability Victoria
- Latrobe City Council
- Wellington Shire Council
- Baw Baw Shire Council
- Resource Recovery Gippsland
- Latrobe Valley Authority
- Latrobe Health Assembly
- Asbestos Council of Victoria/Gippsland Asbestos Related Disease Support Group (GARDS)
- Australian Manufacturing Workers Union
- Construction, Forestry, Mining and Energy Union
- Electrical Trades Union
- Australian Workers Union
- Australian Services Union.

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<sup>1</sup> View the Terms of Reference at: <https://www.asbestostaskforce.net>

## Support for increased education and training

The Taskforce supports the need to increase education and training for those people who may be working with or near asbestos-containing materials.

In November 2020, the Taskforce made four key recommendations<sup>2</sup> to the Victorian Government, which are currently being reviewed by an inter-agency committee. Recommendation No. 2 calls for compulsory asbestos awareness training for specified occupations to be embedded in the Occupational Health and Safety Regulations, and the particulars of this recommendation may be viewed in the Appendix.

While the Taskforce recommendation speaks to the need for mandating training, it does not specify the content of the training or accreditation status. It is recommended that all apprentices do a general awareness course when commencing their apprenticeship, with those in high-risk trades (i.e. those who may encounter asbestos-containing materials more frequently) undertaking a specialised course in Year 2 or Year 3 relating to their field.

If the Taskforce recommendation is accepted by the Victorian Government, it is expected that a complete review of training particulars, including course content and accreditation, qualifications and delivery methods will be undertaken.

### Response to Questions 1 – 9 in the discussion paper

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?

The Taskforce strongly agrees that apprentices should be made aware of any asbestos exposure risks before coming into contact with asbestos-containing materials.

2. While all WHS laws impose duties on PCBUs (or equivalents) 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?

The Taskforce recommendation is that all trades who undertake asbestos training be specified in the Victorian Occupational Health and Safety Regulations, in line with the way it is specified in the A.C.T.

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?

In Victoria, there is currently no specified accredited course for asbestos training.

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).

As detailed in the Taskforce recommendation, additional trades that would need to be included in Victoria that are not specified in the A.C.T. legislation are fitters and vehicle mechanics. There may also be other workers who come into contact with asbestos that are not necessarily referred to as

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<sup>2</sup> [https://www.asbestostaskforce.net/LVAT\\_Recommendations\\_Nov2020](https://www.asbestostaskforce.net/LVAT_Recommendations_Nov2020)

tradespersons, such as local government employees attending call-outs to reports of illegally dumped rubbish that may contain asbestos waste.

**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?**

The Taskforce believes that accredited training is preferable to non-accredited training. However, it is recognised that the training delivered in each jurisdiction may need to be tailored, and therefore it may be challenging to mandate a nationally accredited training course across all 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 Taskforce has not reviewed this area. As mentioned above, if the Victorian Government accepts the Taskforce training recommendation, it is anticipated that a full review including regulatory impact assessments will be undertaken.

**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).**

<b>Options</b>	<b>Taskforce response</b>
6.1 Maintain the status quo	Do not support
6.2 Work with industry to add a core unit of competency for asbestos safety awareness	Support
6.3 Increased encouragement from WHS regulators to choose specific training	Support
6.4 WHS regulators to approve asbestos awareness courses and training providers	Support
6.5 Adoption of mandatory asbestos safety training requirements (the ACT model)	Fully support

The Taskforce recommendation is to mandate asbestos training for specified occupations as per the ACT model. However, the Taskforce supports all efforts to increase the number of people undertaking asbestos training.

**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?**

The Taskforce has not identified any other levers at this stage.

**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?**

If training is not mandated, then people entering trades will continue to be at risk of asbestos exposure. As detailed in the discussion paper, while there are many training packages that include asbestos training, the majority of these are designated as elective units. This sends the message that asbestos training is not important.

By educating all tradespeople about the dangers and potential dire health consequences of asbestos exposure and their likely interaction with it, the risks of exposure will be significantly reduced and the widespread increased knowledge will result in behaviour change in the workplace and flow into the broader community.

# Appendix

Excerpt from the Year One Recommendations report presented to the Victorian Government in November 2020 by the Latrobe Valley Asbestos Taskforce

## Recommendation No. 2

### Compulsory asbestos awareness training for specified occupations

#### Background

There is currently no mandated base-level requirement for an apprentice in any field to understand the risks of asbestos exposure when commencing a trade. This is especially concerning as there are numerous situations in which asbestos-containing materials may be encountered across many different industries.

It is also common for a person to be working in a trade, and not necessarily have completed an apprenticeship, and therefore introducing compulsory training for apprentices only will not capture all persons working in trades, nor will it address the lack of asbestos awareness that exists more broadly.

Recent data from the Australian Institute of Health and Welfare<sup>3</sup> reveals that the trades which have the highest likelihood of exposure to asbestos are builders, plumbers and gasfitters at 85%, electricians at 84% and metal fitter/turner/toolmakers next at 74%.

In response to the dire 'Mr Fluffy'<sup>4</sup> situation in the A.C.T. which saw numerous homes using loose-fill asbestos as insulation material, the A.C.T. Government brought in compulsory asbestos awareness training for a large list of specified occupations,<sup>5</sup> however this list does not include all occupations that may encounter asbestos-containing materials in Victoria, notably fitters and vehicle mechanics. It is estimated that up until 1990, approximately 60% of the total amount of raw asbestos imported into Australia, was used in Victoria in the automotive manufacturing industry.<sup>6</sup>

#### RECOMMENDATION

**Alter the Occupational Health and Safety Regulations to mandate asbestos awareness training for all tradespeople (specified occupations) to reduce the risk of asbestos exposure, and thereby the incidence of asbestos-related disease and future impacts on the Victorian health system.**

<sup>3</sup> Mesothelioma in Australia 2019, AIHW. <https://www.aihw.gov.au/getmedia/558c0b6d-e872-4a0f-953d-23ae6afab3b0/aihw-can-134.pdf.aspx>

<sup>4</sup> <http://www.asbestostaskforce.act.gov.au/about/history>

<sup>5</sup> [https://www.accesscanberra.act.gov.au/app/answers/detail/a\\_id/3093/#tabs-2](https://www.accesscanberra.act.gov.au/app/answers/detail/a_id/3093/#tabs-2)

<sup>6</sup> Victorian Occupational Health and Safety Commission, Asbestos: Usage in Victoria, substitutes and alternatives, October 1990

## Benefits

By educating all tradespeople about the dangers and potential dire health consequences of asbestos exposure and their likely interaction with it, the risks of exposure will be significantly reduced and the widespread increased knowledge will result in behaviour change in the workplace and flow into the broader community.

To introduce the behavioural change urgently required to reduce the risk, it is suggested that all apprentices and specified high-risk trades complete asbestos awareness training within the next 12 – 18 months, followed by the rest of specified occupations in the following 12 months.

Having all trades complete this training will also mean that for the most part, apprentices will be more empowered to say 'No' to bosses who insist they continue to work on a site where asbestos could be present but the site has not been assessed for asbestos-containing materials.

## Risks/impacts

There will be a cost to business to ensure employees undertake this training, however for apprentices this could be included as part of the Occupational Health and Safety unit of the relevant TAFE apprentice training program and so not necessarily an additional cost.

As part of the training for apprentices, it is proposed that all apprentices complete a general asbestos module in Year One, followed by a trade-specific asbestos module in Year Two or Three for those trades considered high-risk.

The need for a 'refresher' training course for high-risk trades could also be considered, with a suggested frequency of every five years.

There are a number of registered training organisations (RTOs) that deliver asbestos awareness training, and part of the consideration would be readying RTOs for the roll-out of statewide training.