



Submission Template | Asbestos Safety Training Options for Workers Entering Trades

Submission from: Plumbing and Pipe Trades Employees Union

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, raising awareness of asbestos should be required before apprentices are at any risk of exposure. Basic asbestos awareness training should be delivered at the earliest stage possible preferably pre-apprenticeship stage. The Plumbing Trade requires work in all aspects of a structure whether it be in a maintenance role or the construction stage on new structures to old structures. Plumbers are required to work within the fabric of a structure (in this submission Fabric = in all parts of a structure including but not limited to in soil, walls, floor and ceiling cavities, in appliances, re-roofing materials etc) ie: in the ceiling spaces, under the floors and within the walls. As such our trade leads us to have a higher risk of exposure to asbestos. For this reason it is vital that young people considering a career as a Plumber are given trade appropriate asbestos training as soon as practicable. As a minimum, awareness training immediately prior to or on commencement of the apprenticeship. Plumbing apprentices first modules at trade school cover the OH&S aspects of industry, and asbestos awareness should be mandated as one of the criteria covered, followed by trade specific training equal to Non-Friable (B class) removal training no longer than at or around the end of the 2nd year of the apprenticeship. The rationale being that as a first/ second year apprentice the worker should be constantly supervised by a competent Trades person, for this reason trade specific awareness training would be appropriate however towards the end of the second year of the apprenticeship there would be an expectation that the apprentice should become more autonomous and require a higher level of trade specific asbestos training ie: Non-Friable (B class) removal training level.

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?

It is our opinion that a more prescriptive approach needs to be taken, we have seen multiple examples of situations where even though there is a likelihood of asbestos being present (via register or div 5/6 audit) that no training is offered until asbestos is discovered usually resulting in



exposure to workforce, then an occupational hygienist is wheeled out to conduct a toolbox meeting and this is passed off as “asbestos awareness training”. Sites rely on an “unexpected finds” procedure to deal with asbestos, the problem being someone “finds” the asbestos and is consequently exposed.

This could be improved by mandatory minimum approved and accredited trade specific asbestos training as opposed an “awareness talk” by the hygienist.

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?

Unfortunately, no statutory regulator in the country defines what is suitable, adequate, competent person or supervision.

In Victoria the OHS Act 2004 applies a General Duty to-provide information, training, instruction, and supervision (s21). So far is reasonably practicable. The Ohs Regs 2017 require employers and self-employed persons performing “limited asbestos removal work” to make and keep training records (reg 251-252) the regs also provide that an employer make a record of any training provided in relation to carrying out “asbestos related activities” (reg 319).

Plumbers in general (in the construction industry) are not asbestos removal workers and as such would not be expected to undertake asbestos related activities and as such not required to be trained but are often exposed to asbestos onsite due to a number of issues for example lack of or out dated registers, poor or non-existent div 5/6 audits, unidentified asbestos in soil or builders relying on unexpected finds procedures rather than removing prior to commencing works, there are multiple examples of asbestos contaminated ceiling spaces in multi-story site all around the city.

In the domestic (residential)sector smaller “Mum and Dad” plumbing companies often find themselves confronted with ACM’s when replacing Hot water services, renovating bathrooms, kitchens, and laundries. With a lack of trade suitable adequate trade specific asbestos training these discoveries can often lead to exposure for the plumber and delays and extra cost for the homeowner. In this scenario, (Reg 250) Plumbers can remove non-friable ACM provided that it doesn’t exceed 10 sqm and doesn’t perform more than 1hr of asbestos removal work in total during a 7-day period, but B class level training is not mandated, only awareness training. Do this for a 40 plus years and you have a lifetime of potential exposure with minimal training.

Appropriate accredited trade specific training delivered at the apprentice stage would promote a strong baseline level of awareness and limit / prevent countless exposure events.



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).

It is crucial to recognise that different occupations have a different risk profile when it comes to asbestos, speaking from a Plumbing perspective (sanitary drainage, fire protection, **gas fitting** and heating and ventilation) our diverse trade is required to work in all aspects of a structure from excavating drainage trenches, roughing-in services, water, gas and drainage under the floor in the walls, ceilings and on roofs in all manner of structures both old and new. All increasing the potential to asbestos.

This reinforces the requirement for approved accredited appropriate contextualised trade specific training (B class standard) at the earliest possible stage.

The above reflects why the plumbing industry has the highest occupational disease rate statistically. Plumbers can still experience exposure to ACM's, the main issue is the cumulative effect of exposure of varying amounts over a period of time resulting in a lifetime of exposure.

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?

Nationally recognised training is generally preferred over non-accredited training

1. Employers look for a universal accreditation i.e., a training outcome that will be recognised and gives the participant recognised formal training outcome.
2. Accredited training is regulated by a government agency such as ASQA (Australian Skills Quality Authority)
3. Accredited training is delivered by registered training organisations (RTO) by suitably qualified and competent trainers that have current industry skills and knowledge that are relevant to the training being delivered.
4. Plumbers move from employer to employer, state to state, and within their trade classifications, therefore nationally recognised training must be mandated.



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?

Several factors will influence a PCBU when choosing training when there is a multitude of choice for “awareness training” and commercial factors are always a factor when deciding what is suitable i.e.: cost, availability, duration, location. Often these factors outweigh the validity or appropriateness of the training, some small business struggle to understand their obligations and duties under OHS laws. They know they must do some training but are not sure what it should look like and what course or provider would best meet their needs or is most suitable for the type of work they are undertaking.

We often see an employer scramble to find training after there has been an exposure and more often than not they settle on a tool box talk from a hygienist supplied by the principle contractor.

This question reaffirms the need for nationally recognised training, as it is industry based and not just single business orientated. Whilst training is tailored for the enterprise, the focus must be on industry needs.

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).

6.5 Adoption of mandatory Asbestos training requirements.

Our opinion is that non-friable (B class) removal training level would /should be the minimum standard for any trade that is required to work with-in the fabric of a structure.

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?

Mandatory appropriate trade specific training would be the ideal outcome, stronger compliance and enforcement from our safety regulators would make this more achievable, unfortunately our regulator historically hasn't been forceful enough on this issue. Often, they turn up after an exposure and are happy accepting a talk from the hygienist as training. Only accredited training should be accepted.

Understanding the gap between an asbestos worker undertaking asbestos related activities and a tradesperson unwittingly exposed to asbestos due to an inadequate / non-existent asbestos register, or a poor or incomplete asbestos audit is vital. Strong enforcement from our regulators would be a strong deterrent



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?

By understanding the classifications of plumbing, and the scope in which they work, a plumber has the potential in their working life to work in various aspects of the trade from heating and cooling, sanitary, roofing, gas fitting and fire protection, all of which had a high usage of asbestos containing materials. We would like to re-iterate that an apprentice coming into the plumbing industry today at 18 yrs.' of age and retiring at 70 yrs.' has the potential to be exposed throughout the entire course of their working life. Whilst this will not be everyday or every week, it however still has a potential of lifetime exposure, so at the out-set we stress as a minimum for all plumbers, nationally accredited b class removal training.

In Victoria in the Plumbing industry there is very little to no asbestos training. It may be briefly mentioned in the CI card in the context of hazardous substances, this is also true of the Plumbing apprenticeship, so in effect there is no asbestos awareness training prior to or during the Plumbing apprenticeship, as Plumbers are not asbestos workers they will not receive any form of formal asbestos training until they have unfortunately been exposed at work and then it will most likely be in the form of a 15 min tool box talk from an occupational hygienist, not approved accredited training.