



Submission Template | Asbestos Safety Training Options for Workers Entering Trades

Submission from: **DAVID CONNORS**

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. Mandatory training is required as part of all construction industry apprenticeships.

Structured units of competency that inform apprentices of appropriate ACM identification, PPE and materials handling techniques, should form the basis of any proposed training.

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?

No. A national asbestos specific course is required to enable consistent training of apprentices. Such a course would contain units of competency designed specifically to support the '*model code of practice*'.

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. There is insufficient guidance for PCBUs in relation to 'site specific' training requirements and very little suitable course/units of competency identification.

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).

Appendix 1 is a comprehensive list that is suitable for nationwide construction industries.



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. There needs to be a nationally recognisable consistent training regime to cater for the transitory nature of the construction industry. This would also enable consistent recognition, of PCBU compliance, by regulators and insurance providers.

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?

No. Consistency across the sector is the overriding consideration in this space.

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).

I support option 6.5 for the following reasons:

The advantages of this option is that it would create a level playing field nationally, which is absolutely essential if secondary school students are to be given the option of gaining accreditation as part of any targeted learning platform. It would also ensure that every worker entering a trade will have the training necessary to keep them safe. It provides, much needed, certainty to PCBUs about how to discharge their asbestos training duties and ensures that the obligation to provide training occurs from the time a worker commences work.

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?

Inclusion of the accreditation as part of prescribed qualifications, for all state licences to practice, would be an appropriate incentive, to individual workers and PCBUs alike, as it enhances public stakeholder awareness of their collective 'ability to protect' during construction works.

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?

Ensuring that safety training is suitable for school aged stakeholders, and is made available as part of any platform that informs their career considerations, will improve the overall knowledge and capability of a forward thinking construction sector.