Submission Template | Asbestos Safety Training Options for Workers Entering Trades

Submission from: **The Electrical Trades Union of Australia**

Contact details: [redacted]

Whilst you can structure your submission in any form that you choose, you may like to use the questions below to frame your thoughts and ideas. Please write as much as you like.

The final question – question 9 – is open ended and asks for any feedback or experience you may like to give.

Information about submissions:

Please send your submission (or any questions) to engage@asbestossafety.gov.au

Consultation closes on **17 December 2021**. We will acknowledge receipt of all submissions received.

Please note that your submission may be published on our website. If you would like your submission to be excluded from publishing, or to be published anonymously, please indicate this below:

☐ do not publish submission

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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?

Definitely. Apprentices are at aggravated risk of exposure to asbestos given their (typical, though not universal) inexperience. Via their lack of exposure to working in industry, apprentices are more likely to believe that the asbestos problem has been "solved" and be unaware of its continued prevalence *in situ*. Further, apprentices are less likely to have a general knowledge of identifying asbestos, making it all the more likely that they disturb ACMs. Finally, apprentices will usually be unaware of the process for reporting and obtaining medical assessment in the event of an exposure.

Apprentices in the electrical trades work across a range of environments. Indeed, as part of the electrician apprenticeship it is mandated that apprentices are rotated through industries. This results

in most electrical apprentices working in some combination of at least domestic, rail, industrial, and commercial environments.

Asbestos awareness training should be reinforced throughout the apprenticeship, but an initial package should be required prior to or on commencement of the apprenticeship. As set out in the submission of the Plumbers Union, electrical apprentices should also receive trade specific training equal to Non-Friable (B class) removal training in their second year.

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 ACT regulation should be adopted as a model. The experience of the ETU's members in the ACT is that the training is practical, relevant, and life-saving.

The other jurisdictions should be encouraged to adopt this model as a priority.

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, this is a national problem across all jurisdictions. Again, as identified by the Plumbers Union, trade-specific accredited training delivered at the apprentice stage, in conjunction with the ACT model, would drastically lift the minimum training standard for asbestos related jobs as well as improving the broader community awareness of the ongoing risks posed by ACMs.

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).

The ACT scheme is broadly appropriate, but should include all electrical trades including:

- Electrical linesworker
- Electrical cablejointer
- Electrical instrumentation technicians

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 preferable *provided* that it does not undercut existing regimes. Such training needs to adopt a highest common denominator approach, taking into account that over the course of their career workers will often work across multiple jurisdictions.

Nationally recognised training will ensure an improved minimum level of awareness, but will not replace the PCBU's obligations in specific circumstances (for instance, for workers going into the power industry).

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 lack of guidance, particularly for smaller operators, is a perennial source of concern. Again, it goes back to the importance of properly accredited training to ensure a heightened minimum level of knowledge.

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).

Both options 6.2 and 6.5 should be adopted.

Option 6.5 is an immediate "fix" which would have an immediate impact on workers in industry. However, the ACT scheme should only be viewed as a minimum training standard.

Longer term, option 6.2 provides a more thorough and tailored solution – ensuring that the training matches the real life needs of the trade in question. However, and noting the current systemic reform of the VET system, this cannot realistically be viewed as a near or short term solution. Rather, it should be prosecuted vigorously once the new "industry cluster" model is in place from 2023.

Alternatively, the course could be run in parallel with the training package. The ETU notes the submission of E-Oz Energy Skills Australia, and supports the proposal made therein.

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?

For electrical trades, a system of continuing professional development is being implemented in Victoria and exists, to an extent, in Tasmania. Asbestos awareness can and should be incorporated into these systems, and others as they emerge.

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?

Asbestos exposure is a major risk and, as exposed in the recent data from Border Force and news reportage on Boral's vermiculite boards, there continues to be a steady stream of imported ACMs. There should be an improved regime in place where developers, builders, and hardware suppliers conduct spot checks for asbestos on-site/in store, instead of over relying on their supply chain QA.