



Submission Template | Asbestos Safety Training Options for Workers Entering Trades

Submission from: Faculty of Asbestos Management ANZ

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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- do not publish submission
- publish submission anonymously
- other, please advise

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?

(box will expand as you type)

Asbestos awareness training is required before apprentices commence work, or are at risk of asbestos exposure. Ideally this awareness training should be incorporated into their training and apprenticeship prior to being potentially exposed.

In addition, refresher training or similar should be provided to personnel who have previously completed their training or apprenticeship and who are working in the industry. This would ensure that whatever standard and level of training is implemented following this review is not only provided to new workers prior to commencement of work, but also to those workers who are already in the industry who would benefit from this awareness training.

Basic asbestos awareness training should cover:

- Basic asbestos types and properties
- Health impacts of asbestos exposure
- History of asbestos use and regulation in Australia
- Exposure standard and action levels for airborne asbestos within Australia
- Description and details of common asbestos materials found within the built environment and how to identify locations and/or materials likely to contain asbestos. Clear emphasis on the importance of if you are unsure stop work and get it tested is required
- Requirement of and understanding of how to use site asbestos registers, risk assessments and permit to work systems
- Controls for working near asbestos or in building where asbestos may be present
- Controls for working on asbestos containing materials. e.g. preparation and painting of asbestos cement cladding. These could be quite numerous and specific to certain industries, therefore may need to be split into separate modules and provided based on relevance.
- Controls for minor asbestos disturbance/removal works – works not requiring a license
- Safe handling of asbestos, PPE/RPE decontamination etc.



2. While all WHS laws impose duties on PCBU's (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?

The ACT approach is a reasonably suitable approach as it provides specific guidance on what training is required and provides oversight on who is able to provide that training. This ensures that people who have completed the training have a standard level of asbestos awareness across the board. This system allows PCBU's to be sure that the training provided is suitable and adequate.

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?

Victoria

While the Victorian compliance code for managing asbestos in workplaces provides guidance about what information, instruction and training needs to be provided there is no detail given on the method or content required for this training. This will lead to large inconsistencies between organisations and individuals. Even where asbestos awareness training has been provided, there is no assurance that the training provided was adequate. No guidance is given on asbestos awareness courses. No requirements or oversight of training providers is detailed within the compliance codes or regulations, and non-accredited asbestos awareness training is allowable.

We have a number of client enquiries about asbestos awareness training. In general, the enquiries include questions about what are the requirements of training, what is required to satisfy the regulations and what would the training cover. This highlights that even where people are seeking out asbestos awareness training, it is confusing and unclear as to what they need to satisfy the requirements. In addition, it is often the case the client will ask what is the difference between the training we provide, and the training provided by another company that is significantly cheaper. As there is no specific requirements or controls placed on asbestos awareness trainers in Victoria it would be very difficult to determine the adequacy of different training providers when looking for asbestos awareness training.

In short the Victorian compliance code provides a shortlist of points that may be provided as part of asbestos awareness training but does not prescribe what specific training needs to be provided, and who is capable of providing this training. This will lead to significant differences in the training received between organisations and individuals. Insufficient detail is provided to determine if the training provided is suitable and adequate.



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).

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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 to non-accredited courses for a number of reasons. Primarily, by having a nationally accredited training course the level of the training provided is standardised across the board, ensuring that all persons completing the training have the same level of understanding and knowledge of asbestos awareness. In addition, training providers must be approved to deliver the training, this further ensures that the quality and information provide is to the level required.

Relying on non-accredited courses has various issues, the most significant of these is inconsistencies between courses and trainers. While some non-accredited courses may be suitable at providing a level of information and understanding in asbestos awareness to ensure that persons entering the workforce are not exposed to airborne asbestos, many may not be suitable to provide this information. As there is no accredited syllabus or approval system for trainers, there is no regulation of the training.

In short, nationally recognised training allows the PCBU to have some confidence that they are meeting their duties as they know that the training provided to their personnel is to the required standard.



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?

Due to the large variety of training providers, and the varied options in training provided, it is quite difficult for PCBUs to not only choose a training provider, but to ensure that the training provided meets their duties under WHS laws. Where so many options are available and there is no specific direction from within the guidance documents/regulations etc. (with the exception of ACT) the PCBUs are left to determine what training provider from a long and growing list will be suitable to meet their duties. What is likely to happen in this situation is cost will be a large defining factor, and cheaper options will generally be selected. Cheaper options may not be providing the best training outcomes, but it would be very difficult for a PCBU to determine the merit of the training and the training provider without actually going through with the training.

We (Victorian based) have a number of client enquiries about asbestos awareness training. In general, the enquiries include questions about what are the requirements of training, what is required to satisfy the regulations and what would the training cover. This highlights that even where people are aware of their duties and are seeking out asbestos awareness training, it is confusing and unclear as to what they need to satisfy the requirements. In addition, it is often the case the client will ask what is the difference between the training we provide, and the training provided by another company that is significantly cheaper. As there is no specific requirements or controls placed on asbestos awareness trainers in Victoria it would be very difficult to determine the adequacy of different training providers when looking for asbestos awareness training.



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).

In order of preference:

6.5 is a suitable option that has been shown to work in the ACT. Careful consideration of the asbestos awareness course would need to be taken to ensure a workable national model. Having a nationally recognised unit of competency provided by RTOs allows for PCBUs to have certainty about how to discharge their asbestos training duties.

6.2 could be a suitable option. This has been shown to work to some extent in WA. Having a nationally recognised unit of competency provided by RTOs allows for PCBUs to have certainty about how to discharge their asbestos training duties.

6.4 and 6.3 have issues with not necessarily being nationally recognised, meaning issues will be encountered with workers working over multiple jurisdictions. In addition, not relying on RTOs to provide the training puts the burden on WHS regulators to regulate and monitoring the training and training providers.

6.1 is probably not suitable. After reading over the discussion paper, and looking over my own answers, it is very clear that the status quo is unsuitable for providing workers with the protection from risk of ACM exposure that is required.



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?

Ideally something along the lines of the construction industry white card system would be a good option for ensuring all workers have sufficient knowledge of asbestos awareness prior to working in a situation where they may be exposed to asbestos.

By having a similar card system, where record of completion of an RTO course is required to apply for the issue of a nationally recognised card, this deals with a number of issues that we see with asbestos awareness among trades at the present time. Firstly, by requiring the training to be completed as nationally-recognised training by a registered RTO, there are controls in place to ensure that the training is sufficient in scope and presented to an appropriate standard. Secondly, as the issuing office for the 'card' is the regulatory authority in each state, it ensures that the WHS regulators have overall control of the system. Thirdly, being nationally recognised, there would need to be a memorandum of understanding between jurisdictions to allow for the use of a card issued in one jurisdiction to be used in other jurisdictions, this ensures ease of use for people who have completed the 'card' and limits unnecessary costs for PCBUs who have personnel across multiple jurisdictions.

As the card would be an 'entry to site' requirement, this would be able to capture all workers, and not just those who will have completed their training following the date of introduction of whatever method is decided upon. All workers will need to show evidence of their construction industry white card, and their asbestos awareness in the construction industry card prior to commencing work on site. As with the white card, there would need to be application routes for recognition of prior learning where appropriate to allow those workers who have had previous suitable training in asbestos awareness to use this in an RPL scheme. As with the white card, this unit of competency could be built into VET construction courses either as a core unit or an elective unit, but would allow for persons who are currently completing their training to complete this unit and be issued with a 'card' prior to completing their training.

This could further fit into a nationally recognised asbestos competency framework that would include various competency cards/licenses. The base level being asbestos awareness for the construction industry, where a certain unit of competence would need to be completed for the card to be issued. Other levels would include asbestos assessor (similar to the asbestos assessor license which is required in some states), B Class asbestos removal and A Class asbestos removal.



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?

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