



Australian Government

Department of Defence

**DEFENCE SUPPORT GROUP
STRATEGIC ASBESTOS MANAGEMENT PLAN:
for the management of asbestos in Defence owned
Infrastructure and the Estate
2007**

DSG STRATEGIC ASBESTOS MANAGEMENT PLAN

AUTHORISATION

This edition of the Australian Government, Department of Defence, *Defence Support Group Strategic Asbestos Management Plan* has been authorised for issue.

Martin Bowles
Deputy Secretary
Defence Support Group

2007

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FOREWARD

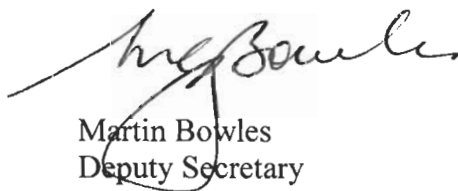
The Defence Support Group (DSG) is committed to achieving the highest standards of safety in all aspects of our portfolio's business, a key component being that we create and sustain the working, training and living environment for over 98,000 civilian employees, Service men and women, their families and contracted service providers.

Over recent years adverse health risk trends associated with the use of asbestos are being widely experienced both nationally and internationally. This is an acknowledged issue also faced by Defence.

In response to risk concerns, I am pleased to endorse this DSG Strategic Asbestos Management Plan 2007. The aim of the DSG Strategic Asbestos Management Plan (the Plan) is to define the DSG Policy for the control and management of asbestos within Defence owned and leased infrastructure and the Defence Estate.

The DSG Strategic Asbestos Management Plan aligns with the broader Defence safety commitment, statutory obligations and international standards. It provides the means to build and improve a preventative safety and health culture, and will enable us to systematically manage the asbestos liability through risk mitigation measures, better workforce education programs and utilising industry guidance to influence future policy decisions.

I wish to thank all those who have contributed to the development of this Plan.



Martin Bowles
Deputy Secretary
Defence Support Group

30 April 2007

EXECUTIVE SUMMARY

Asbestos materials were widely used in Australia by the building and construction industry up until the late 1980s. To this end asbestos materials are commonly found across the Defence Estate in insulation material, electrical switchboards, wall cladding, roofing, sound proofing, air conditioner ducts, landfill, buried waste, and waste piles. Given the size and age of the Estate, Defence has accumulated a substantial asbestos liability. This situation presents potential health risks for users of the Defence Estate as well as litigation and reputation risks to the Department and its Executives.

In response to this situation the DSG Strategic Asbestos Management Plan (the Plan) has been developed to define the DSG Policy for the control and management of asbestos exposure risks associated with the infrastructure and the Defence Estate. The Defence Estate comprises of land, buildings and infrastructure including acquisitions and disposals, leases, facilities development and maintenance, and environment and heritage matters.

The Plan will enable DSG to meet its moral and statutory obligations, including industry leading practice and performance management standards. The Plan will provide for continuous improvement opportunities.

The primary objective is to have an asbestos free Defence Estate. To achieve this long-term objective DSG has adopted a best practice approach to manage in situ asbestos until its removal. The purpose is to ensure:

- confidence in DSG's management of asbestos by the Government of the day, unions, employees, contractors, regulators and the wider community;
- a reduction in the number and severity of asbestos exposure incidents; and
- that future asbestos related health claims against Defence are minimised.

Activities to support the objective include the development of:

- Regional Asbestos Management Plans that are aligned with this National Plan;
- supplementary operational DSG Asbestos Management Procedures;
- an Asbestos Register based on the Defence Estate Management System (DEMS); and
- an Asbestos Communication, Training and Education Strategy.

On-going asbestos survey and remediation programs will continue in the DSG Regions and these activities will be monitored through the development of regional and contractor performance audits.

Regular performance reports will be provided to the DSG Occupational Health and Safety Committee on the implementation and effectiveness of this Plan.

ACKNOWLEDGEMENTS

The DSG Strategic Asbestos Management Plan was developed by the DSG Directorate of Occupational Health and Safety (DOHS) in consultation with a wide range of stakeholders. The Directorate wishes to thank the following individuals for contribution to the Plan:

Ms Patricia Devlin, Asbestos Manager, DSG DOHS
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Mr John Heggart, Director, Defence Centre for Occupational Health
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Pickford and Rhyder Consulting Pty Ltd

1. INTRODUCTION

1.1. The Department of Defence (Defence) has a statutory obligation to establish and maintain clearly defined systems of work that enables it to provide a safe and healthy work environment for its employees, contractors and visitors. The commitment to this process has been clearly articulated by Chief of Defence (CDF) and Secretary for Defence (Secretary) through:

- a) The Defence Occupational Health and Safety Policy Statement;
- b) DI(G) PERS 19-18 Defence Safety Manual (SafetyMan);
- c) The Defence Occupational Health and Safety Strategic Plan 2004-2006; and
- d) Defence Employees' Certified Agreement 2006-2009.

1.2. As the "Employing Authority" for Defence under the *Occupational Health and Safety Act* 1991 (Amended 2006), (the OHS Act) and prescribed in the *Occupational Health & Safety (Safety Standards) Regulations 1994* the CDF and Secretary have delegated responsibility and accountability for the implementation of appropriate systems to manage and control hazards, which incorporates asbestos, in workplaces to Service Chiefs and Group Heads.

1.3. Head Personnel Executive (HPE) has the portfolio responsibility on behalf of CDF and Secretary to provide the guidance and tools necessary for Services and Groups to meet their legislative obligations. Within HPE, the Occupational Health, Safety and Compensation Branch develops portfolio-wide policies, guidelines and tools that enable Services and Groups to develop a standardised approach to asbestos management for Defence.

1.4. The Defence Support Group (DSG) OHS Commitment Statement of October 2006 disseminates this requirement for DSG. Fundamental to this is the demonstrated commitment, leadership and accountability by all DSG employees and contractors to ensure that we achieve our goals and broader Defence safety obligations and commitments.

2. AIM

2.1. The technical terminology used in this DSG Strategic Asbestos Management Plan (the Plan) is to be found in the Definitions that are located at the rear of the document. The definitions are sourced from the *National Code of Practice for the Safe Management of Asbestos in the Workplace* [NOHSC 2002: 2005].

2.2. The aim of this Plan is to define the DSG Policy for the control and management of asbestos exposure risks associated with the infrastructure and the Defence Estate. It will also inform the processes and activities necessary to ensure that DSG can verify to the CDF, Secretary and key stakeholders that the Deputy Secretary, is able to meet the delegated responsibilities and accountabilities in relation to asbestos management as contained in Defence policy.

2.3. Furthermore, the Plan will also ensure:

- a) that DSG meets its statutory and moral OHS obligations;
- b) there is a consistent and standardised approach to the management of Asbestos Containing Material (ACM) in infrastructure and across the Defence Estate;
- c) alignment to Defence's broader safety, quality and environmental commitments; and
- d) that DSG is recognised as a best practice manager of in-situ asbestos during Defence's transition to reaching the ultimate goal of being asbestos free.

2.4. This document will be supported with the yet to be developed DSG Asbestos Management Procedures. The proposed DSG Asbestos Management Procedures will provide detailed guidance on how to comply with the 2003 National Asbestos Prohibition and prevent human exposure to airborne asbestos fibres while ACMs remain in the workplace. The Plan and DSG Asbestos Management Procedures will be supported by a central asbestos register, which will lead to better informed works programs, and reduced asbestos incidents, and the continuation of the asbestos removal program.

3. REGULATORY REQUIREMENTS

3.1. All Commonwealth, State and Territory jurisdictions have regulated the management and removal of asbestos to protect people in workplaces. These regulatory controls are complemented and supported through national codes of practice for the management and removal of asbestos in workplaces. This aligns with commitments made by Governments to achieve improvements in work-related health and safety including the effective prevention of occupational disease.

3.2. As DSG is responsible for a national portfolio of properties, the methodology used for the management and control of asbestos in the Defence Estate must comply with the most stringent requirements contained in Commonwealth, State or Territory legislation, National Standards, Codes of Practice and Defence Standards. This approach ensures compliance to legislation and the highest standards of occupational health and safety.

3.3. The primary legislative requirements for Defence asbestos obligations are listed as follows:

- a) *Occupational Health and Safety Act 1991*;
- b) *Occupational Health and Safety (Safety Standards) Regulations 1994*;
- c) *Code of Practice for the Management and Control of Asbestos in Workplaces* [NOHSC 2018 (2005)], known as 'NOHSC Asbestos Management Code';
- d) *Code of Practice for the Safe Removal of Asbestos, 2nd Edition* [NOHSC: 2002 (2005)], known as 'NOHSC Asbestos Removal Code'; and
- e) *Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres 2nd Edition* [NOHSC: 3003 (2005)], known as 'NOHSC Membrane Filter Method'.

3.4. Defence’s primary asbestos policy and guidance is located within *SAFETYMAN*, Volume 1, Part 5, Chapter 2; *Asbestos Management in Defence*, including all cross reference material. In relation to safety and emergency management procedures, Defence’s primary policy and guidance material is located within *SAFETYMAN*, Volume 1, Part 1, Chapter 3; *Safety and Emergency Management Across Establishments*, including all cross reference material.

3.5. Whilst DSG primarily adheres to Commonwealth legislation, DSG regions are required to follow applicable State or Territory law with respect to the hiring of appropriately licensed contractors and the disposal of asbestos waste. It is noted that contractors are required to comply with State or Territory law. The current applicable State and Territory Acts and Regulations are as listed below:

NSW	<ul style="list-style-type: none"> ▪ <i>Occupational Health & Safety Act 2000</i> ▪ <i>Occupational Health & Safety Regulation 2001</i> ▪ <i>NSW Protection of the Environment Operations Act 1997</i>
Victoria	<ul style="list-style-type: none"> ▪ <i>Occupational Health & Safety (Asbestos) Regulations 2003</i>
Queensland	<ul style="list-style-type: none"> ▪ <i>Workplace Health and Safety Regulation 1997</i>
South Australia	<ul style="list-style-type: none"> ▪ <i>Occupational Health & Welfare Regulations 1995</i>
Western Australia	<ul style="list-style-type: none"> ▪ <i>Occupational Safety & Health Regulations 1996</i> ▪ <i>Health (Asbestos) Regulations 1992</i>
Tasmania	<ul style="list-style-type: none"> ▪ <i>Workplace Health & Safety Regulations 1998</i>
ACT	<ul style="list-style-type: none"> ▪ <i>Dangerous Substances Act 2004</i> ▪ <i>Dangerous Substances (General) Regulation 2004</i>
Northern Territory	<ul style="list-style-type: none"> ▪ <i>Work Health Act 2006</i> ▪ <i>Work Health (Occupational Health & Safety) Regulations 2002</i>

It should be noted that the majority of States/Territories have adopted the NOHSC Asbestos Management and Removal Codes.

4. SCOPE

4.1. The Plan applies to the Defence Estate being all workplaces, facilities and the associated infrastructure (including items of fixed plant) that are owned, leased, maintained or managed and under the control of the DSG for, and on behalf of Defence.

4.2. All Defence employees and contractors undertaking work with ACM (including all forms of asbestos, friable and bonded form) on Defence Estate sites will comply with this Plan and supplementary Asbestos Management Procedures. Work on ACM that is part of mission critical items is not covered by this Plan and is the responsibility of operational areas of the Navy, Army and Air Force, and or the Joint Logistics Group and the Defence Materiel Organisation. Asbestos waste derived from work on mission critical items should be disposed of under the requirements of section 15.4 of this Plan.

4.3. At no time will any exception or modification be required or permitted that downgrades the NOHSC or regulatory compliance requirements, including relevant State or Territory law.

4.4. All work conducted in relation to ACM will be specified by Defence in Statements of Work that will be developed to stipulate the minimum requirements in each of the following areas as required:

- a) Survey for ACM, either initial or follow-up survey;
- b) Friable ACM removal;
- c) Bonded ACM removal;
- d) Decontamination of ACM affected areas; and
- e) Emergency work with ACM.

4.5. In the case of emergency work, the Statement of Work will be universal so that work is not delayed due to the development of a specific Statement of Work.

4.6. Various Reports will be generated in this process. The following key reports which are to be developed must be retained in Defence corporate files and cross-referenced in the Asbestos Register of the Defence Estate Management System Database:

- a) Asbestos Hazard Identification Report (AHIR)
- b) Risk Assessment Report (RAR)
- c) Certificate of Clearance (CC)

4.7. These reports will be supported by National Association of Testing Authorities (NATA) Certificates of Analysis of Asbestos Containing Material (ACM), and other more detailed reports by consultants and contractors engaged for work associated with the identification, assessment and remediation of asbestos.

4.8. The Plan is to be reviewed annually for effectiveness and performance.

5. OBJECTIVES

5.1. The long-term objective is an asbestos free infrastructure and Defence Estate. To achieve this DSG has adopted a best practice approach to manage or remove in situ asbestos. The purpose is to ensure:

- a) confidence in DSG's management of asbestos by the Government of the day, unions, employees, contractors, regulators and the wider community;
- b) a reduction in the number and severity of asbestos exposure incidents; and
- c) that future asbestos related health claims against Defence are minimised.

5.2. Activities to support the objectives are:

- a) Regional Asbestos Management Plans that are aligned with this National Plan.

The Regional Plans are to address each of the components listed in section 8.2 of

the *Code of Practice for the Management and Control of Asbestos in Workplaces* [NOHSC 2018 (2005)].

- b) supplementary operational DSG Asbestos Management Procedures;
- c) Regional on-going asbestos survey and remediation programs;
- d) an Asbestos Register based on the Defence Estate Management System (DEMS);
- e) Asbestos Communication, Training and Education Strategy; and
- f) Regional and contractor performance audits.

6. ABOUT ASBESTOS

6.1. Asbestos in the Australian context

6.1.1. The term asbestos refers to a group of fibrous serpentine and amphibole minerals that have high tensile strength, poor heat conduction and are relatively resistant to chemical attack. Asbestos was commonly used in buildings, building materials, equipment, motor vehicles and friction materials. The principle varieties of asbestos used in buildings and building materials are chrysotile (white asbestos), and crocidolite (blue asbestos).

6.1.2. Whilst Australia ceased mining asbestos in 1983, Australia continued to import and manufacture asbestos products. By the early 1980s the use of asbestos containing materials in building products was beginning to be phased out and its use in buildings was ceased in the mid 1980s. In remote areas, the use of existing stocks of ACM for construction may have continued until the late 1980s.

6.1.3. As a result of an increased understanding of the adverse effect to health through exposure to airborne asbestos fibre, the use and management of asbestos and products containing asbestos is now highly regulated. However it is widely supported that when ACMs are contained in a bonded form that is maintained in good condition and left undisturbed, they present no measurable health risks. In general, asbestos related diseases such as asbestosis and lung cancer have been diagnosed in people working or involved with high levels of exposure to asbestos products over significant periods of time. Mesothelioma has been associated with lesser exposures.

6.1.4. In 1993, the former National Occupational Health and Safety Commission (NOHSC) released the National Hazardous Substances Regulatory Framework, a suite of regulatory controls for hazardous substances in the workplace. On 31 December 2003, a national prohibition on all uses of chrysotile asbestos took effect. The national prohibition does not extend to the removal of asbestos products that were in situ when the prohibition took effect.

6.1.5. In situ asbestos products must be managed to ensure that the risks of exposure to airborne asbestos fibres are minimised.

6.2 Asbestos in the Defence context

6.2.1. Given its versatility asbestos was used in a broad range of applications in the Defence context; for instance, building materials, equipment and platforms. In the DSG context it is commonly found in insulation material, electrical switchboards, wall cladding, roofing, sound

proofing, air conditioner ducts, landfill, buried waste and waste piles. DSG has identified that the majority of Defence's buildings were built prior to 1990, leaving Defence with a large asbestos liability.

6.2.2. The total removal of asbestos from infrastructure and the Estate could take several decades.

6.2.3. Asbestos exposure risk is a potential significant health issue for Defence employees and others and exposes the Department and its Executives to potential litigation. The opportunity for DSG to proactively and effectively manage this risk across the Defence Estate goes to the heart of DSG's reputation as an Enabling Group within the Defence Organisation.

6.2.4. DSG plays a key role in supporting Defence capability by creating and sustaining the working, training and living environment for more than 98,000 Defence employees and their families and contracted service providers. This role is responsible for the management of the Defence Estate (comprising land, buildings and infrastructure) including acquisitions and disposals, leases, facilities development and maintenance, and environment and heritage matters. A contractor workforce delivers much of the maintenance and base support services. DSG delivers results for Defence by ensuring that:

- a) its customers have confidence in our products, service, performance and cost;
- b) DSG services are known to its customers, and can be easily accessed; and
- c) DSG is recognised as a high performing organisation.

7. ROLES AND RESPONSIBILITIES

7.1 DSG obligations

7.1.1. Commonwealth, State and Territory OHS legislation require persons in control of any workplace to consult with health and safety representatives and workers at the workplace on OHS issues.

7.1.2. Defence OHS policy directs that DSG is specifically responsible for ensuring:

- a) a program for the implementation and maintenance of asbestos management plans is established for items of fixed plant;
- b) the administration, identification, labelling, enclosure, encapsulating and removal of asbestos from Defence buildings and land;
- c) the maintenance of registers clearly identifying the location and condition of existing asbestos materials on establishments;
- d) all Defence structures are inspected for asbestos. The inspections are to be documented in asbestos hazard registers regardless of whether or not asbestos is found;
- e) that the asbestos exposure risk is prioritised and communicated to all relevant parties; and

- f) that contractors providing advice or undertaking work in relation to asbestos are qualified, licensed and experienced.

7.1.3. Defence OHS policy further directs that Service Chiefs, Group Executives, Commanding Officers and Public Service Executives are to provide appropriate resources to support the implementation of those asbestos related responsibilities. A dedicated funding stream has been identified to accelerate the existing DSG asbestos surveys and remediation program.

7.1.4. Whilst the safe management of asbestos is a Defence wide responsibility, in the DSG context, particular parties have greater capacity, responsibility and influence to ensure best practice in asbestos management. This responsibility lies with DSG regional management and others with the potential to control Defence premises, namely the Comprehensive Maintenance Services and Garrison Support Services contractors. Nevertheless the ultimate responsibility to ensure safe management of asbestos and safe workplaces within the Defence Estate will always remain with the Defence Organisation.

7.2 Record keeping

7.2.1. It is a legislative requirement and Defence policy that all correspondence and documentation relating to asbestos projects undertaken within the Defence Estate are maintained in Defence corporate files. These requirements apply for all asbestos related projects whether they are capital works or maintenance projects. Documents to be retained include:

- a) contract documentation;
- b) State or Territory Government authority approval, disposal, permits, and certificates;
- c) asbestos analysis reports;
- d) clearance inspection reports;
- e) correspondence and minutes of meetings with stakeholders; and
- f) records of management decisions.

7.3 Defence employees

7.3.1. All Defence employees have a responsibility to report damaged or suspected ACM. They should also report the improper use of Personal Protective Equipment (PPE) or any concerns regarding asbestos related work being conducted by contractors. Such occurrences or concerns should be reported to the nominated DSG contacts as detailed in the relevant Regional Asbestos Management Plan or Defence Restricted Network website (and reported to their supervisor where required).

7.3.2. Key DSG employees hold specific asbestos management responsibilities for the Defence Estate in the 12 DSG regions. These regional Defence Support employees include the Regional Manager, Manager Technical Services, and the Asbestos Officer or the Occupational Health and Safety Officer.

7.3.3. Regional Managers are responsible and accountable to Head of National Operations Division for ensuring:

- a) authority and governance of the Comprehensive Maintenance Services and Garrison Support Services contract;
- b) the delivery of their respective regional asbestos management programs; and
- c) ensuring asbestos exposure incidents and issues are reported to the relevant Safety and Emergency Management Committee.

7.3.4. Asbestos Officers or nominated officers under the limited supervision of their respective Regional Manager and Manager Technical Services play a key coordination role to ensure the effective implementation and operation of the DSG Asbestos Management Plan. They are responsible and accountable to the Regional Manager with regards to:

- a) the management of the conduct and review of regular asbestos surveys across the Estate;
- b) the currency and accuracy of asbestos registers and the placement of warning signs;
- c) the development of Regional Asbestos Management Plans in accordance with the NOHSC Asbestos Management Code;
- d) the review of project specifications and management of the planning and delivery of asbestos related works performed by contractors;
- e) liaising and advising contractors of Defence requirements for the management of asbestos related works;
- f) ensuring the delivery of information and training on the health risks associated with asbestos to DSG employees, contractors, sub-contractors, and others;
- g) monitoring and review of the Regional Asbestos Management Plans;
- h) reporting, investigating, and recording of asbestos exposure incidents;
- i) reporting of asbestos exposure incidents to their Regional Manager and the DSG Directorate of OHS;
- j) maintaining records of all asbestos related projects and incidents in accordance with legislative and Defence requirements; and
- k) preparation of regular performance reports.

7.4 Contractors

7.4.1. Contractors deliver Comprehensive Maintenance Services (CMS) and Garrison Support Services (GSS) to Defence on behalf of DSG. Activities include unplanned rectification of defects and the execution of a planned program of works.

7.4.2. Whilst contractors are on Defence property, they have a duty of care under relevant Commonwealth, State or Territory legislation, and at common law to provide a safe workplace and implement and maintain safe systems of work for their employees, Defence employees and third parties at or near the workplace.

7.4.3. It is a clear condition of CMS and GSS contracts that the prime contractor is responsible for ensuring that sub-contractors' safety management systems are assessed. Defence's OHS responsibilities, however, cannot be delegated completely to contractors. There will still remain a duty of care on Defence and DSG to monitor and take all reasonable steps to secure the safety of the contractor and others at or near the workplace.

7.4.4. Each region's CMS and GSS contract will have a nominated Contract Authority. Under the terms of the CMS contract, contractors are responsible and accountable to the Contract Authority or their nominee with regards to:

- a) ensuring that their employees and sub-contractors are appropriately qualified/licensed and aware of their responsibilities;
- b) complying with Commonwealth/State/Territory legislation; and
- c) complying with the procedures stated in this document and any other procedures stipulated or specified in contract documents.

7.4.5. Further to this, either through separate direction or expanded scope for work, CMS contractors deliver the following additional services:

- a) scoping, documenting and planning asbestos surveys including regular re-surveys across the estate as directed by the Contract Authority or their nominee;
- b) updating the asbestos register and placement of warning signs;
- c) contributing to the development of regional asbestos management plans;
- d) scoping, planning and delivery of asbestos related works across the Estate as directed by the Contract Authority or their nominee;
- e) reporting to the Contract Authority or their nominee before commencing work on ACM sites;
- f) ensuring that their employees and sub-contractors are provided with asbestos awareness training; and
- g) reporting and assisting with the management of asbestos exposure incidents or potential hazards to the Contract Authority or their nominee before carrying out further work.

8. COMMUNICATION, TRAINING & EDUCATION

8.1. Defence policy requires that information and training be provided to Defence employees, contractors and visitors who may come into contact with ACM in the Defence Estate. Asbestos related issues are of critical interest to the Government, Defence employees and their families, Defence contractors and other stakeholders such as the media. The mere presence of ACM that is in a stable condition and is not friable rarely represents an immediate unacceptable risk to health. But it is recognised that a lack of information about asbestos can cause unnecessary anxiety.

8.2. The DSG asbestos training program will use a “triggered awareness” model for the delivery of asbestos training to its employees and stakeholders to reinforce effective messages about the health risk posed by asbestos. Training will be targeted at those directly involved in high risk occupational activities and those indirectly involved because of their proximity to or interest in the asbestos related activity.

8.3. Asbestos training and education awareness programs will be delivered to the following groups:

- a) DSG employees, contractors, contractors’ employees and sub-contractors directly involved in asbestos work;
- b) DSG employees and contractors working in areas where (stable/encapsulated) asbestos is present;
- c) DSG employees and contractors who are bystanders (as adjacent neighbours) during activities where asbestos will be disturbed; and
- d) Defence stakeholders who are bystanders (adjacent neighbours) during activities where asbestos will be disturbed.

8.4. As the group most likely to work with and disturb asbestos, all DSG employees, contractors, their employees and sub-contractors directly involved in asbestos related work shall participate in a DSG asbestos awareness training program. The objective of this training activity is to achieve changes in behaviour and improvements in asbestos management by ensuring that contractors and sub-contractors understand the OHS consequences of exposure to asbestos, appropriate control measures, their legislative obligations and Defence requirements on the safe handling of asbestos including the use of PPE. Only when training has been completed will contractors and their employees and sub-contractors be allowed to perform asbestos related activities on Defence property. In addition to this training, the responsible DSG employees shall ensure that contractors provide evidence of holding appropriate qualifications or licences to perform asbestos related activities as required in their respective State or Territory.

8.5. Prior to the commencement of planned asbestos related works, asbestos awareness information and the nature of the work shall be provided to DSG employees, contractors and other stakeholders who are bystanders. This information will include correspondence and information sessions where appropriate.

8.6. In conjunction with the OHS&C Branch, asbestos awareness information shall be provided to persons such as Defence employees, contractors and other stakeholders who work in buildings where asbestos is present. The objective of asbestos awareness information is to ensure transmission of accurate messages about the health risks posed by asbestos. Accurate messages shall include risk assessments from asbestos surveys, the timetable for remediation, control measures to be implemented, relevant literature and details of web based asbestos information.

9. ASBESTOS REGISTER

9.1. Asbestos is a scheduled hazardous substance and as such it is a legal requirement and Defence policy that accurate and current registers of hazardous substances including asbestos are maintained. DSG currently maintains an asbestos register located within DEMS.

9.2. The DEMS was developed to suit the special needs of Defence and fulfils the NOHSC Asbestos Management Code requirements. As part of the DSG Plan, the asbestos register within DEMS is being improved to facilitate data entry and routine use. The new register will contain detail regarding:

- a) the location of ACM in the Defence Estate including;
- b) risk assessments on each occurrence of ACM including the results;
- c) recommended control measures based on those risk assessments; and
- d) any maintenance work conducted on ACM.

9.3. Sites known to be contaminated with asbestos are to be listed on the Contaminated Sites Register within DEMS.

9.4. The redesigned asbestos register will contain a number of particular reporting features including regular schedules for asbestos re-inspections.

9.5. It will be a requirement that asbestos survey reports, analysis reports, and clearance certificates for specific premises, structures and land are retained in a Defence corporate file and cross-referenced in the respective register entry.

9.6. It will be a requirement that the DSG asbestos register or extracts of particular Defence facilities are made accessible to:

- a) Defence employees and their representatives;
- b) any other employers on the premises such as Defence consultants or Defence contractors;
- c) employees of Defence contractors;
- d) asbestos removalists or maintenance workers; and
- e) any person who is likely to be exposed to ACM.

9.7. A standard asbestos survey report template Asbestos Hazard Identification Report (AHIR) will be developed to ensure consistent reporting of information for the asbestos register. The AHIR will form the basis of information required for the asbestos register.

9.8. It is a requirement that the asbestos register including any risk assessments are reviewed every 12 months or earlier where:

- a) a risk assessment indicates the need for reassessment (see section 13); or
- b) any ACM has been disturbed or removed.

9.9. A visual inspection of identified ACM should form part of the review.

10. INSPECTIONS AND HAZARD IDENTIFICATION

10.1. Rationale for identification of asbestos

10.1.1. DSG is responsible for the hazard identification, risk assessment, registration, risk control (including prioritising, labelling, enclosure, encapsulation and removal) of Asbestos Containing Material (ACM) from the Defence Estate.

10.1.2. Due to the variety of types and locations of ACM within the Defence Estate, for example floors, walls, ceilings, plant, equipment and insulation, it is necessary to identify every instance of ACM in an effective and consistent manner as recognised in the *Code of Practice for the Management and Control of Asbestos in the Workplace [NOHSC: 2018 (2005)]*, known as the 'NOHSC Asbestos Management Code'.

10.2 Surveys

10.2.1. Each DSG Region should direct their Comprehensive Maintenance Services contractors to:

- a) procure the inspection of all areas of the Defence Estate (including reviewing inspection reports of leased and cadet accommodation), communication pits, fixed plant and known landfill, buried waste and waste piles in respect to the location of asbestos.
- b) engage a competent person to survey and assess the location, types and condition of ACM in all areas of the Defence Estate. Inaccessible areas should be assessed and reported, and deemed to contain ACM unless convincing information indicates otherwise.
- c) record the locations, types and condition of ACM including deemed ACM, in the asbestos register.
- d) ensure that all activities associated with hazard identification processes are conducted safely in respect to all occupants, visitors and contractors.
- e) ensure that the identification of ACM is conducted in accordance with the principles laid out in Part 9 of the 'NOHSC Asbestos Management Code', relevant legislation, and Defence requirements.

10.2.2. All surveys are to be conducted by competent and experienced persons sourced through the Defence Infrastructure Panel or other organisations approved by State/Territory authorities.

10.2.3. DSG policy requires that asbestos surveys will be conducted, or overseen by an occupational hygienist holding full membership with the Australian Institute of Occupational Hygienists, preferably being certified as a Certified Occupational Hygienist (COH), or a Certified Industrial Hygienist (CIH) with the American Board of Industrial Hygienists, or other equivalent certification.

10.2.4. Building plans and site history including previous surveys should be consulted by the contracted surveyor prior to any survey. Access to all locations including areas with restricted access within each facility should be available to surveyors. It is important that an assessment of the risks to health and safety of surveyors and sampling employees is carried out before a site survey is conducted. Those risk assessments should be documented and made available to surveyors.

10.2.5. Advance notice of asbestos surveys should be provided to building occupants (including restricted buildings and areas) to enable appropriate security arrangements to be put in place and safety precautions to ensure that no person is exposed to any safety risk.

10.3 Material sampling

10.3.1. All suspected ACM should be sampled in accordance with the requirements for bulk asbestos sampling procedure to be detailed in the proposed DSG Asbestos Management Procedures and summarised as follows:

- a) All sampling will be in accordance with Australian Standard AS 4964-2004 '*Method for the qualitative identification of asbestos in bulk samples*' (AS 4964) and conducted by 'competent' and named employees with proven field experience.
- b) Areas found inaccessible and building materials not analysed and believed to contain asbestos must be presumed to contain asbestos unless proven otherwise.
- c) Minimise damage to ACM, and/or repaired so as to not cause a risk to health.
- d) Sample collection employees and occupants or visitors to areas being sampled for ACM must be appropriately protected.
- e) 'Wipe' or 'adhesive tape' samples of dust on surfaces will NOT be collected unless the sampling and analytical method is validated in accordance with National Association of Testing Authorities (NATA) guidelines, and approved by Defence in writing.
- f) Dust on surfaces can be collected in rare circumstances provided that this is justified, and if so, must be collected in accordance with the requirements for bulk asbestos sampling procedure in the DSG Asbestos Management Procedures.

10.4 ACM Analysis Requirements

10.4.1. DSG policy requires that all samples of suspected ACM must be analysed in accordance with the requirements for bulk asbestos analysis procedure to be detailed in the proposed DSG Asbestos Management Procedures and summarised as follows:

- a) All building material, dust and soil samples will be analysed strictly in accordance with AS 4964, by laboratories holding current and operative accreditation for this test by the NATA.
- b) Analysts must be accredited by NATA as being approved identifiers, and if not a signatory, supervised by a signatory applicable to this test.
- c) The results of analyses (including those results that confirm a suspect material is not an ACM) must be contained in a NATA endorsed certificate of analysis, clearly containing a reference to the test method in accordance with AS 4964, and be a complete record of all facts applying to the sampling and analysis.
- d) The results of all samples will be accompanied by a brief supporting letter providing an informed opinion of the degree of friability and the broad percentage of asbestos found in each sample, (as a guide to Defence and other occupational hygienists on potential risk and possible control actions).

10.5 ACM Reporting Requirements

10.5.1. The analytical results (including those results that confirm a suspect material is not an ACM) and survey reports of all ACM must be recorded in the asbestos register, in the form 'Hazard Identification Report'.

10.5.2. The report shall include key information such as site location, date of inspection, name of inspector, name of organization inspecting. For each ACM found, information recorded will include location, extent, type, friable/bonded form and condition. Inaccessible locations should be reported, and presumed to contain ACM unless evidence shows to the contrary.

10.6 Warning Signs and Labelling

10.6.1. It is a requirement that all buildings and sites within the Defence Estate that are known or presumed to contain asbestos display warning signs that comply with Australian Standard 1319 *Safety Signs for the Occupational Environment* at all main entrances.

10.6.2. A competent person should determine the number and positions of warning labels for identified or presumed ACM within those buildings, this would include vicinity labelling where it is not practical to label the ACM such as floor tiles or lagging. Further requirements on warning signs and labels will be contained in the DSG Asbestos Management Procedures that are to be developed.

11. RISK ASSESSMENT

11.1. DSG policy requires that asbestos identification must be followed by a risk assessment to determine the level of risk present. A risk assessment should be prepared for each occurrence of ACM found within the Defence Estate. Risk assessments should take into account the location, overall work practices, types and condition of ACM.

11.2. DSG policy requires that the risk assessment, including subsequent reviews or revisions, should be prepared by a Certified Occupational Hygienist holding full membership with the Australian Institute of Occupational Hygienists or a Certified Industrial Hygienist with the American Board of Industrial Hygienists.

11.3. Properly prepared risk assessments showing relevant risk ratings for the particular asbestos hazard will allow informed decisions about control measures.

11.4. Risk assessment results should be documented in the asbestos register and included in the applicable asbestos management plan for the facility.

11.5. Risk assessments should show a scale of risk ratings in accordance with general principles outlined in Part 11 of the NOHSC Asbestos Management Code for the following asbestos hazards:

Risk rating	Hazard condition
VERY HIGH	Friable asbestos material likely to pose a risk to health from exposure (e.g. accessible insulation and likely to be disturbed, or located in air conditioning ducts)
HIGH	ACM showing significant deterioration, that is only likely to be disturbed during routine maintenance activity
MEDIUM	ACM showing minor deterioration, that is only likely to be disturbed during routine maintenance activity
LOW	ACM that is not friable and in a stable condition (sealed/encapsulated) and unlikely to be disturbed by regular access in normal operating conditions

11.6. The risk assessment tool used should qualitatively assess the extent, location, condition of asbestos and the likelihood of exposure to measure the consequences or impact of not controlling asbestos.

11.7. Risk assessments must be reviewed regularly or in the following circumstances:

- a) evidence shows the risk is no longer valid;
- b) the control measures are no longer effective;
- c) significant change is proposed for the workplace i.e., work practices or procedures relevant to the risk assessment;
- d) there is a change in the condition of the ACM; or
- e) the ACM has been removed, enclosed or sealed.

12. HIERARCHY OF CONTROLS

12.1. In relation to asbestos management, the term *remediation* is commonly used to cover the range of controls that may be employed should asbestos be found. These controls range from the total removal of ACM through to treatment such as isolation (barricading or similar), encapsulation (painting or sealing ACM so that it cannot become fibrous), or enclosing (using mechanical means such as walls and other permanent barriers to prevent contact with people). For ACM that does not pose a health risk, a control may be a program of ongoing monitoring and workforce awareness.

12.2. Control measures for ACM should be implemented according to the hierarchy of controls:

- a) Elimination/removal (most preferred);
- b) Isolation/enclosure/sealing;
- c) Engineering controls;
- d) Safe work practices (administrative controls);
- e) Personal protective equipment (least preferred).

12.3. It should be noted that a combination of these controls may be required for the effective control of airborne asbestos fibres in the Defence context.

12.4. DSG policy requires that all risk control planning for the management of in-situ asbestos in the Defence Estate should be prepared or at least overseen by either a Certified Occupational Hygienist or a Certified Industrial Hygienist.

12.5. A summary of the relative advantages and disadvantages of each control method is presented in the following table.

DSG STRATEGIC ASBESTOS MANAGEMENT PLAN

Appropriate when:	Not appropriate when:	Advantages	Disadvantages
<p>In situ Control -; Defer</p> <ul style="list-style-type: none"> • Negligible risk of exposure • Asbestos inaccessible and fully contained • Asbestos stable and not liable to damage 	<ul style="list-style-type: none"> • Possibility of deterioration or damage • Airborne asbestos dust exceeds recommended exposure standard 	<ul style="list-style-type: none"> • No initial cost • Cost of removal deferred 	<ul style="list-style-type: none"> • Hazard remains • Need for continuing assessment • Asbestos management program required • Need for constant awareness
<p>In-situ Control -; Encapsulate/Seal</p> <ul style="list-style-type: none"> • Removal difficult or not feasible • Firm bond to substrate • Damage unlikely • Short life of structure • Readily visible for regular assessment 	<ul style="list-style-type: none"> • Asbestos deteriorating • Application of sealant may cause damage to material • Water damage likely • Large areas of damaged asbestos 	<ul style="list-style-type: none"> • Quick and economical for repairs to damaged areas • May be an adequate technique to control release of asbestos dust 	<ul style="list-style-type: none"> • Hazard remains • Cost for large areas may be near removal cost • Asbestos management system required • Eventual removal may be more difficult and costly
<p>In-situ Control-; Enclosure</p> <ul style="list-style-type: none"> • Removal extremely difficult • Fibres can be completely contained within enclosure • Most of surface already inaccessible • Disturbance to, or entry into, enclosure area not likely 	<ul style="list-style-type: none"> • Enclosure itself liable to damage • Water damage likely • Asbestos material cannot be fully enclosed 	<ul style="list-style-type: none"> • May minimise disturbances to occupants • Provides an adequate method of control for some situations 	<ul style="list-style-type: none"> • Hazard remains • Continuing maintenance of enclosure • Asbestos management program required • Need to remove enclosure before eventual removal of asbestos • Precautions necessary for entry into enclosure
<p>Removal Control-; Remove</p> <ul style="list-style-type: none"> • Surface friable or asbestos poorly bonded to substrate • Asbestos is severely water damaged or liable to further damage or deterioration • Located in air conditioning duct • Airborne asbestos exceeds recommended exposure standard • Other control techniques inappropriate 	<ul style="list-style-type: none"> • Located on complex and inaccessible surfaces • Removal extremely difficult and other techniques offer satisfactory alternative 	<ul style="list-style-type: none"> • Hazard removed • No further action required 	<ul style="list-style-type: none"> • Increases immediate risk of exposure especially to removal workers • Creates major disturbance in building • Often highest cost, most complex and time consuming method • Removal may increase fire risk within building; substitute required • Possible contamination of whole building if removal done poorly

13. PRIORITY FOR REMOVAL

13.1. Defence's removal hierarchy

13.1.1. Defence has adopted the following strategy:

- a) High risk asbestos is removed as soon as possible; and
- b) Stable and sealed asbestos is left in place undisturbed until it can be removed through a managed program based on priority and risk.

13.1.2. Whilst asbestos will be removed according to its priority risk rating, priority for removal or remediation may also take into account Defence capability, situations likely to attract adverse media attention, cause embarrassment to the Government, or diminish Defence's reputation.

13.1.3. Whilst removal activities will be based on risk management principles, the following ACM should be considered as a priority for removal (refer to tables at sections 11.5 and 12.5):

- a) asbestos insulation inside air-conditioning ducts;
- b) accessible friable asbestos insulation;
- c) deteriorated bonded asbestos products;
- d) inaccessible friable asbestos insulation;
- e) bonded asbestos products;
- f) asbestos roofing membrane;
- g) structural asbestos sealants and mastics; and
- h) all other ACM.

13.1.4. Where it is practicable and economically viable to do so, DSG's preference is to totally remove ACM from buildings. However, removal may not be the chosen option particularly in buildings that are reaching the end of their design life. In those cases ACM that is in a safe condition is to be left in situ and monitored until the building is demolished.

13.2 Other funding streams

13.2.1. ACM should be removed in line with State and Territory legislation before demolition, partial demolition, renovation or refurbishment of buildings. To make best use of the Asbestos Management Program budget, funding streams of refurbishment/renovation/heritage projects should be utilised to replace ACM removed through remediation activities.

14. MANAGING IN SITU ASBESTOS

14.1 Re-inspections and asbestos in soils

14.1.1. When ACM has been identified, assessed, recorded and left in situ, it is a legal requirement that it is managed (management plan developed) to ensure it does not pose a health risk.

14.1.2. DSG policy requires that re-inspections of in situ ACM will be performed as part of the Facilities Appraisal Plans under the CMS contract. At the very least visual inspections of ACM should occur every 12 months or earlier if the risk assessment indicates or if any ACM has been disturbed or removed. It will not be necessary to re-sample and analyse known ACM during re-inspections.

14.1.3. To assist with this activity, the re-developed asbestos register will be used to inform a schedule of re-inspections for ACM. The re-inspection regime will assist in reviewing the asbestos management plan and setting the priority for removal where required. All documents and reports raised through the re-inspection regime shall be retained and recorded on the asbestos register.

14.1.4. The issue of asbestos in soils is common across the Defence Estate. Asbestos in soils is associated with landfill sites or past demolition areas, and can be scattered across a broad area. It is often in the form of cement sheeting or broken fragments. The methods used for the decontamination of the site should be based on a risk assessment. Professional site remediation services must be used.

14.2. Safe work practices

14.2.1. Before commencing any construction, maintenance work or training activities within areas of the Defence Estate, all contractors and Defence employees must consult the relevant asbestos register and asbestos management plan for the site to determine if any asbestos on the site is likely to be disturbed by that activity.

14.2.2. Defence Force training activities should not be conducted on Defence premises where there is known ACM without first seeking advice from the relevant DSG regional office. Defence Force Commanders should conduct a risk assessment in relation to conducting that training activity on that site. If the training activity is to proceed consideration should be given to the wearing of appropriate PPE.

14.2.3. All contractors and sub-contractors such as tradespeople must undergo site induction training before commencing maintenance activities in areas known to contain asbestos. Such training should alert the tradespeople to the presence of asbestos and prevent any work activity that might expose them or others to airborne asbestos fibres. Only contractors licensed to work with ACMs will be engaged to perform maintenance work where there is known ACM. Before commencing maintenance work, it should be checked that such contractors hold relevant State or Territory licences for working with ACMs, and obtain any relevant site permits.

14.2.4. Defence persons or contractors working in areas known to contain ACMs should not conduct any activity likely to disturb the building fabric.

14.3 Permit to work

14.3.1. Contractors should not commence maintenance work without obtaining a permit to work endorsed by the primary CMS contractor. The permit to work would document that the contractor has accessed the asbestos register, the asbestos management plan and received the relevant training for the site. The permit to work should detail the nature of work to be performed and document the contractor's agreement to:

- a) abide with the requirements for working with ACMs as detailed in the NOHSC Codes of Practice;
- b) isolate/restrict access to the work area;
- c) provide and erect appropriate warning signs;
- d) the use of safe work techniques;
- e) wearing of PPE;
- f) appropriate decontamination and clearance inspections of the work area; and
- g) remove and dispose of any ACM (including PPE) in accordance with State and Territory laws.

14.3.2. A copy of the permit to work (issued/endorsed by primary CMS contractor) should be added to the relevant regional Defence corporate file for the site.

14.4 Consultation and communication

14.4.1. Prior to the commencement of any maintenance work on ACMs, Commanding Officers, Executives and all other persons likely to be affected by the maintenance work such as workers in the vicinity or adjacent offices should be informed about the nature of the work, the processes to prevent exposure to asbestos and safety processes designed to minimise any risk to health such as barriers, PPEs and air monitoring devices. Where possible, work on ACM should be scheduled during periods of low activity. For some situations, it will be necessary to vacate the premises.

15. ASBESTOS REMOVAL

15.1 Safe removal guidelines

15.1.1. It is DSG Policy that all asbestos removal works shall be conducted in accordance with the NOHSC Code of Practice for the Safe Removal of Asbestos and the relevant requirements of State and Territory legislation. DSG policy also requires that only contractors licensed or qualified to remove asbestos in that State or Territory shall be engaged by CMS Contractors on behalf of DSG.

15.2 Project supervision/contract management

15.2.1. Defence policy requires that all asbestos work projects be fully scoped, documented and planned before the commencement of any work. This includes providing access to asbestos registers and survey reports to prospective and actual removalists. Contractors should not commence removal work without obtaining a permit to work endorsed by the primary CMS contractor; a copy of the permit to work should be added to the relevant Defence corporate file for the project.

15.2.2. DSG policy requires that all asbestos removal projects shall be supervised by a Certified Occupational Hygienist, or a Certified Industrial Hygienist or a provider with equivalent certification.

15.2.3. The occupational hygienist should approve:

- a) the asbestos removal control plan;
- b) the emergency plan;
- c) containment measures, removal methodology, decontamination procedures and warning signage for the removal works;
- d) inspection of asbestos removal equipment including PPEs;
- e) post clearance inspection procedures, including air monitoring during the removal works; and
- f) asbestos waste disposal.

15.2.4. DSG employees with project management and contract management responsibilities for particular asbestos removal works should ensure that the removal works have been completed to a satisfactory standard. Samples taken as a result of clearance monitoring should be taken by an occupational hygienist independent to the occupational hygienist supervising the removal works.

15.2.5. All clearance certificates to re-occupy an asbestos work area must be recorded on the asbestos register. NATA endorsed results of analysis should be conveyed to the relevant Commanding Officers and Executives.

15.3. Communication strategies

15.3.1. It is a requirement of State and Territory legislation and DSG policy that where ACM is to be removed from Defence workplaces, there must be full consultation, information sharing and full involvement with Defence employees, contractors, those in adjoining buildings and Defence neighbours about each stage of the removal process. Full and open communication and consultation with those likely to be affected by the removal of asbestos will assist in mitigating delays to the process, potential asbestos exposure incidents and minimise potential asbestos related claims against Defence or bring Defence's reputation into disrepute.

15.3.2. Each asbestos removal project should include a communication strategy identifying all likely stakeholders and detailing the consultation methodologies to be used and points of contact information. Records of all communications and consultations (including Minutes, letters, information posters, Minutes of Meetings) should be held in the relevant Defence corporate file.

15.4. Disposal

15.4.1. It is DSG policy that appropriately licensed local waste disposal contractors dispose of all asbestos waste (including asbestos waste from mission critical items) from the Defence Estate. Generally, licensed asbestos removalists will hold the relevant qualifications for the disposal of asbestos waste. Contractors' licences to dispose of asbestos waste should be verified for currency with the relevant State or Territory authority by the Regional Asbestos Officer prior to the commencement of removal works.

15.4.2. DSG policy requires that asbestos remediation/removal projects include planning for:

- a) storage and containment of waste on site;
- b) the transportation of waste;
- c) relevant local authority disposal requirements; and
- d) relevant local authority approvals.

15.4.3. To ensure the appropriate disposal of asbestos waste from the Defence Estate, contractors must provide a certificate of disposal from the local authority detailing the date and location of the disposal. Copies of all disposal certificates (and any other certificates issued by local authorities or providers) should also be forwarded to the Regional Asbestos Officer or regional nominee and retained on the relevant Defence corporate file.

16. INCIDENT MANAGEMENT

16.1. Management of asbestos exposure incidents

16.1.1. Actual or perceived exposure to airborne asbestos fibres may be caused by the discovery of dust or debris suspected of containing asbestos or inadvertent disturbance of ACM by Defence employees or contractors, or storm/cyclone damage. Asbestos fibre exposure incidents require careful management so that persons exposed to airborne asbestos fibres can be reassured that a swift coordinated response from the Defence Organisation will deliver timely, accurate information about the level of risk to human health.

16.2 Incident management procedure

16.2.1. The following procedure shall be followed by all Defence employees and contractors whenever dust or debris suspected of containing fibrous asbestos is found in the workplace:

- a) Stop work immediately;
- b) Isolate the area and restrict access, i.e. seal off, close doors, post signs; and
- c) Immediately notify the nominated DSG site contact (and supervisor) on the location and nature of the incident.

16.2.2. The nominated DSG site contact shall notify the following key Defence employees in the event of an actual asbestos exposure incident:

- a) Site Executive Safety and Emergency Coordinator or appointed nominee;
- b) DSG Regional Manager;
- c) Regional Asbestos Officer/Occupational Health & Safety Officer;
- d) Technical Authority for Asbestos, Chief Operating Officer Division;
- e) Director General, Occupational Health and Safety Compensation Branch; and
- f) Coordination & Public Affairs Division.

16.2.3. The Executive Safety and Emergency Coordinator and the DSG Regional Manager in collaboration with the Director General, OHS&C Branch provide involved persons with information about the potential health risks of asbestos exposure, offer access to medical assistance and assurances about the asbestos testing and removal regime, and the processes to be followed, and encouragement to register with the Defence Asbestos Exposure Evaluation Scheme (DAEES) on 1800 000 655. Further information about eligibility and access to the DAEES may be found at:

<http://ohsc.defence.gov.au/Programs/Asbestos/aees.htm>

16.2.4. Coordination & Public Affairs Division role is to liaise with Minister of Defence's office, and media if required. All media releases are to be cleared by Coordination & Public Affairs Division.

16.3 Incident reporting and notifying Comcare

16.3.1. The Form AC 563 – *Defence OHS Incident Report* must be completed for all asbestos related incidents. Details of Defence employees, cadets, reservists, contractors and visitors if involved in the incident should be entered on the form where applicable.

16.3.2. Completion of the form is a legislative requirement as it is used to record and notify OHS incidents and dangerous occurrences, and should be used as a trigger to commence an investigation by the relevant Defence Group or service. The completed form must be faxed to Comcare no later than 24 hours after the incident. The Form AC 563 can be found at <http://ohsc.defence.gov.au/DSMA/AC563/Default.htm>

16.3.3. Comcare contact details are as follows:

24 hour Hotline	1300 366 979
Facsimile Number	1300 305 916

16.4 Incident investigation

16.4.1. It is DSG policy that all asbestos exposure incidents on the Defence Estate shall be investigated to examine the cause of the incident, and action taken to ensure processes are in place to minimise future re-occurrences.

16.4.2. The incident investigation report and any recommendations for procedural changes should be reported to the Director General Regions and Bases and the DSG Director, Directorate of OHS via the relevant Regional Manager.

16.4.3. The regulator Comcare is mandated under the *Occupational Health and Safety Act 1991* (the OHS Act) to conduct investigations into asbestos exposure incidents at workplaces where employees or contractors work. Defence, as an employer, is expected to cooperate to the fullest extent possible with the Comcare investigator. Section 43 of the OHS Act (as follows) sets out the obligations of persons when an investigator conducts an investigation.

43 Power to require assistance and information

(1) An investigator may, to the extent that it is **reasonably necessary** to do so in connection with the conduct of an investigation, require:

- (a) the principal officer of an Entity or the chief executive officer of a Commonwealth authority; or
- (b) any person representing a principal officer or chief executive officer; or
- (c) any owner or occupier of a workplace at which the investigation is being conducted; or
- (d) any employee or contractor;

to give to the investigator reasonable assistance, to answer any questions put by the investigator, and to give to the investigator any documents requested by the investigator or copies of such documents, in connection with the conduct of the investigation.

(2) A person must comply with a requirement made of the person under subsection (1).

Note: A person who breaches subsection (2) may be subject to civil action or a criminal prosecution (see Schedule 2).

16.4.4. DSG supervisors should refer to the *Communications Protocols for Defence and Comcare under the OHS (CE) Act 1991*, and *Comcare Enforcement Policy: Investigative and Enforcement Provisions of the Occupational Health and Safety (Commonwealth Employment) Act 1991* and *When an investigator Calls* for guidance on how to respond to Comcare requests for information. These documents may be found on: <http://ohsc.defence.gov.au/Programs/RegulatorRelations/Default.htm>).

www.comcare.gov.au/compliance/

DEFINITIONS

Air-monitoring means airborne asbestos fibre sampling to assist in assessing exposures and the effectiveness of control measures. Air-monitoring includes exposure monitoring, control monitoring and clearance monitoring.

Asbestos means the fibrous form of mineral silicates belonging to the serpentine and amphibole groups or rock forming minerals, including actinolite, amosite (brown asbestos), anthophyllite, chrysotile (white asbestos), crocidolite (blue asbestos), tremolite, or any mixture containing one or more of mineral silicates belonging to the serpentine and amphibole groups.

Asbestos cement (AC) means products consisting of sand aggregates and cement reinforced with asbestos fibres (e.g. asbestos cement pipes and flat or corrugated asbestos cement sheets).

Asbestos containing material (ACM) means any material, object, product or debris that contains asbestos.

Asbestos Management is part of an organization's management system used to develop and implement its asbestos policy and manage the risks associated with asbestos in its working environment.

Asbestos removalist means a competent person who performs asbestos removal work¹.

Asbestos removal control plan means a document which identifies the control measures which will be implemented to ensure workers and other persons are not at risk when asbestos removal work is being conducted.

Asbestos removal work means the removal of ACM.

Bonded (Asbestos) means any material (other than friable asbestos material) that contains asbestos.

Clearance inspection means an inspection, carried out by a competent person, to verify that an asbestos work area is safe to be returned to normal use after work involving the disturbance of ACM has taken place. A clearance inspection must include a visual inspection, and may also include clearance monitoring and/or settled dust sampling².

Clearance certificate means a certificate issued by a competent person (and independent from the person responsible for removing asbestos from a workplace) indicating clearance to re-occupy a remediated workplace.

Competent person means a person possessing adequate qualifications, such as suitable training and sufficient knowledge, experience and skill, for the safe performance of the specific work.

Contractor is persons engaged to undertake activities for and on behalf of DSG.

Contaminated site is inclusive of building and surrounds, communication pits, landfill, buried waste and waste piles.

Defence Estate is all workplaces, facilities (buildings and land) and the associated infrastructure that are owned, leased, maintained or managed and under the control of the Defence Support Group for and on behalf of Defence.

Employee is DSG military members, civilian employees, cadets and reservists who are engaged on a full time or part time basis.

Friable (Asbestos) means asbestos containing material which, when dry, is or may become crumbled, pulverized or reduced to powder by hand pressure.

Hazard is a source or situation with a potential for harm in terms of human injury or ill health, damage to property, damage to the workplace environment, or a combination of these.

Health surveillance means the monitoring of a person to identify any changes in their health as a result of exposure to a hazardous substance. It does not include Exposure Monitoring.

¹ In most States, an asbestos removalist must hold a current Government asbestos removal licence.

² For Department of Defence situations, the removal of friable ACM must include clearance monitoring. The removal of bonded ACM may include air monitoring. In general settled dust sampling should not be used.

In-situ means fixed or installed in its original position, not having been moved.

Inaccessible areas means areas which are difficult to access, such as wall cavities and the interiors of plant and equipment.

National Exposure Standard (NES) means an airborne concentration of a particular substance, within the worker's breathing zone, which according to current knowledge, should not cause adverse health effects or undue discomfort to nearly all workers. NES are established, from time to time, by the National Occupational Health and Safety Commission (NOHSC) and are published on the Australian Safety and Compensation Council website.

Person with control means, in relation to premises, a person who has control of premises used as a workplace. The person with control may be:

- a) the owner of the premises;
- b) a person who has, under any contract or lease, an obligation to maintain or repair the premises;
- c) a person who is occupying the premises;
- d) a person who is able to make decisions about work undertaken at the premises; or
- e) an employer at the premises.

Personal Protective Equipment (PPE) means equipment and clothing that is used or worn by an individual person to protect themselves against, or minimise their exposure to, workplace risks. It includes items such as facemasks and respirators, coveralls, goggles, helmets, gloves and footwear.

Respirable asbestos fibre means a fibre of asbestos small enough to penetrate into the gas exchange regions of the lungs. Respirable asbestos fibres are technically defined as fibres that are less than 3 um wide, more than 5 um in length and have a length to width ratio of more than 3 to 1.

Risk means the likelihood of a hazard causing harm to a person.

Settled dust sampling³ means the sampling and analysis of settled surface dust to provide an indication of cleanliness following disturbance of ACM. Settled dust sampling does not provide an indication of risk to health. Sampling techniques include the use of adhesive tape, wipe or micro-vacuum (using an air sampling pump and filter). Analysis can be polarized light microscopy (PLM) or transmission electron microscopy (TEM).

Structure means any construction, whether temporary or permanent.

Work means any activity, physical or mental, carried out in the course of a business, industry, commerce, an occupation or a profession.

Worker means a person who does work, whether or not for reward or recognition.

Workplace means any place where a person works.

³ For Department of Defence situations, settled dust sampling should only be used when visual inspections and air monitoring cannot suffice. Sampling techniques should include 'scraping' a defined area, or micro vacuum. 'Adhesive tape' and 'wipe sampling' will not be used. Analysis must be by PLM.

APPENDIX

Managing asbestos in buildings

MANAGING ASBESTOS IN BUILDINGS

