
APPENDIX A

**NOTES FOR DEVELOPING AN
ASBESTOS MANAGEMENT PLAN
(AMP)**

INTRODUCTION

Agencies have a statutory obligation under the *Occupational Safety and Health Act 1984* and the *Occupational Safety and Health regulations 1996* to provide a safe workplace for employees. Since asbestos is a hazardous substance there is a requirement for employers to identify and manage it.

The legislation calls on agencies to identify asbestos and to assess the risk in accordance with the *Code of Practice for the Management and Control of Asbestos in Workplaces [NOHSC: 2018 (2005)]* (the Code).

The remainder of the Code, those parts not relating to identification of asbestos or risk assessment, is a general guideline for management of asbestos containing material (ACM).

Part 7 of the Code identifies the responsibilities of “Persons With Control of Premises”:

Persons with control of premises have a duty of care to develop and maintain an asbestos management plan.

Parts 8 to 11 of the Code provide guidelines for the development of an Asbestos Management Plan (AMP). In particular, section 8.2 outlines items required for inclusion and some general statements as to the content required in an AMP:

- The AMP should be clear and unambiguous;
- It should set out the aims of the plan, what is going to be done, when it’s going to be done and how it’s going to be done;
- There should be clear lines of responsibility, with each person involved understanding their role and responsibilities; and
- Relevant State legislation should be checked for further information on individual obligations relevant to the management plan.

The AMP should be broad ranging, in accordance with the above principles.

These notes are intended as a guide for agencies in developing an effective and compliant AMP and are based on Parts 8 to 11 of the Code.

Agencies should first analyse the likely complexity of the AMP and establish whether the required expertise is available internally. If the complexity is beyond the available expertise then the agency would be best served in engaging a consultant to provide the plan.

DETERMINING WHETHER ASBESTOS CONTAINING MATERIAL (ACM) IS PRESENT ON THE SITE(S)

The majority of asbestos products used in Western Australia were manufactured by James Hardie. Following the ban on the use of asbestos, James Hardie ceased using asbestos in building materials in stages by the following approximate time line:

1981- Hardiflex, Hardiplank, Villaboard

1982- Versilux

1984- Harditherm, Compressed, Drain Pipe

1985- Super Six, Highline, Shadowline, Coverline, Roofing Accessories

1987- Pressure Pipe

As stockpiles of asbestos containing products existed and there was some material imported from overseas after these dates, it is generally accepted that buildings completed after 1989 are probably asbestos free and those completed earlier are likely to contain asbestos. Accordingly, there are two methods of determining whether ACM is present:

- Property built post 1989 – review all relevant documentation
 - Inspect construction drawings and specification to ensure that ACM has not been specified or has been expressly forbidden.
 - If possible, talk to the builder or construction supervisor and/or review any construction reports.

This should be sufficient to establish that no asbestos is present.

Where the construction date is significantly past 1989, for example built in the year 2000, it is reasonable to assume without further research that the building is asbestos free.

- Property built pre 1990 or where review is inconclusive – Appoint a “Competent person” to conduct an asbestos survey.

Agencies should be aware that competent persons have varying levels of experience and training and care should be taken to match skills with the complexity of their building(s) in appointing a surveyor. For example, the asbestos register for a large hospital will be quite different to that of a small single storey office building.

DHW can advise on competent persons.

The asbestos surveyor will visually inspect all property elements and may take samples for testing. There are a number of common hidden uses of ACM which may not be obvious to the asbestos surveyor and agencies that are aware of their presence should advise the surveyor to ensure that appropriate checking occurs. Examples are Millboard in air conditioning ducts, asbestos in lift brakes and vermiculite ceilings.

Although the Code provides for a clearance certificate to verify no asbestos present, this is not required in Western Australia, the above steps are considered sufficient.

Where sampling and testing is impractical, difficult or impossible or there are inaccessible areas that are likely to contain ACM, the surveyor may presume the presence of ACM.

If no asbestos is present – there is no requirement to prepare an AMP.

PROVISION OF A COMPLIANT REGISTER

The cornerstone of asbestos management is the recording of the identified ACM in a compliant register. This allows employers to properly inform people likely to be affected by the presence of ACM, to record any changes to the presence or condition of ACM and to comply with legislation.

If ACM is found by inspection, sampling or presumption, then the asbestos surveyor must provide an Asbestos Register.

The register should contain:

1 Information that identifies;

- Property details;
- The date(s) on which the identification was made;
- The identity of the competent person identifying the ACM;
- The location of the ACM (the location needs to be specific to ensure avoidance of disturbance of ACM by a tradesperson working on a site);
- Whether the asbestos is friable (able to be crumbled by hand when dry);
- The condition of the ACM – damaged or intact;
- The type of asbestos (blue, brown or white – usually shown as C [Crocidolite] A [Amosite] or CH [Chrysotile]);
- Material presumed to contain asbestos;
- Inaccessible areas likely to contain ACM; and
- Results of any testing to confirm the presence or absence of asbestos.

The type of asbestos will not be stated where it has been presumed, as it is not possible to determine this without testing.

2 A Risk Assessment of all identified ACM, including;

- The date the assessment was made;
- Details of the competent person conducting the assessment;
- The risk ranking and conclusions of the risk assessment;
- Any reviews or revisions of the assessment;
- The results of any air monitoring for airborne asbestos fibres and an assessment of those results;
- The condition of all ACM found
 - Is it friable or bonded and stable?
- Is it liable to damage or deterioration, and;
- The probability of disturbance.

The risk matrix is derived from the condition of the material - good, fair or poor, and the probability of disturbance – high, medium or low. Risk rankings range from 9 where the condition is good and the probability of disturbance is low, to 1 where the ACM is damaged or friable and the probability of disturbance is high. Some asbestos surveyors may use a different numbering convention by excluding the fair and medium levels of assessment. Neither method is necessarily superior, but consistency across all surveys is highly desirable.

3 Control measures – determined by the risk ranking

Category 1

If the ACM is friable and unstable and there is a risk of exposure, it should be removed by an asbestos removalist as soon as practicable.

Category 2

If the ACM is friable but stable and accessible, it should be removed. If not possible immediately, a short-term control such as sealing and enclosure is acceptable.

Category 3

ACM should be removed before demolition, partial demolition, renovation or refurbishment if it is likely to be disturbed by those works.

Category 4

If the ACM is not friable and is in good, stable condition, minimising disturbance and/or encapsulation are adequate controls with ongoing monitoring and review.

- Any remaining ACM should be clearly labelled

Controls should reflect the following hierarchy:

- Elimination/removal (most preferred)
- Isolation/enclosure/sealing
- Engineering controls e.g. barriers
- Safe work practices (Administrative controls)
- Personal Protective Equipment [PPE] (least preferred)

Recommended control measures and the risk rankings at which they should be used, may be requested from the asbestos surveyor or decided by the agency. These decisions should be documented in the AMP, including reasons and a timetable for implementation. The risk rankings for each category of control may be a single number or a range of rankings depending on the numbering convention used by the asbestos surveyor.

LABELLING

While the Code clearly indicates, at 9.5.2, that all identified or presumed ACM should be labelled, it is recognised that there are circumstances where labelling may be impractical. The emotive nature of the asbestos issue can lead to over reaction to a perceived hazard.

The Asbestos Steering Committee has developed a guideline on labelling which varies from the code of practice but is considered acceptable:

Labels placed in areas with unrestricted access to the public should not contain cautionary text that may raise undue concern. In the case of premises that are particularly sensitive to such concerns, or where the risk of malicious vandal damage may be increased by labelling, warning labels may be omitted provided that:

- Management and control procedures are implemented to ensure that persons who may disturb ACMs are alerted;
- Such procedures are documented in the site asbestos management plan; and
- The person with control of the workplace actively ensures that procedures are implemented.

RECORDING WORK DONE ON ACM IN THE ASBESTOS REGISTER

The asbestos register should include a record of any maintenance or service work conducted on ACM – including:

- The company performing the work;
- The date the work was done;
- The scope of the work undertaken; and
- Details of clearance inspections.

Some work done on ACM will be too minor to warrant recording. It is reasonable to record only those items that materially change a register entry, such as removal of a portion of ACM or painting of an asbestos cement sheet. Where other minor work is undertaken and not recorded in the register, an alternative means of capturing the contractor's visit, such as a log book entry, is necessary.

MONITORING ARRANGEMENTS

The asbestos surveyor may recommend air monitoring, with the frequency and extent of monitoring based on the risk of exposure.

Where air monitoring is recommended, agencies should consider the relative costs of ongoing monitoring against the cost of removing the ACM causing the need for monitoring.

If monitoring is recommended, the plan should document:

- reasons for monitoring;
- frequency of monitoring;
- location and extent of monitoring;
- the results of the monitoring; and
- any subsequent actions dictated by the monitoring.

ACCESS TO THE REGISTER AND AMP

A range of persons, such as workers, contractors, managers, asbestos surveyors or other inspectors require access to the asbestos register. The AMP must document which persons or classes of persons are granted access and should also appoint a custodian of the plan and/or Asbestos Register. The appointed custodian is to be responsible for updating the Asbestos Register and any schedules under the AMP. All agency staff should have access to the AMP, with the means of access documented in the plan.

CONSULTATION AND INFORMATION SHARING

The Code of Practice requires:

- If ACM is identified or presumed, there must be full consultation, involvement and information sharing during each step of the development of the AMP – i.e. during asbestos identification, risk assessment and establishment of control measures; and
- All workers and contractors on premises where ACM is present or presumed to be present, and all other persons who may be exposed to ACM as a result of being on the premises, must be provided with full information on the occupational health and safety consequences of exposure to asbestos and appropriate control measures. The provision of this information should be recorded.

The form of the consultation during the development of the AMP may be through existing process i.e. a safety meeting. Subsequent information sharing may be done through other mechanisms such as circulation of the AMP, via web based training package or any other means available.

The requirement to inform all persons who may be exposed to ACM highlights a sound reason for limiting access to certain parts of buildings by certain classes of persons – for example, limit access by the public to areas where ACM is present. Alternatively, strong control measures are necessary where “other persons” may be present. The key is to ensure no exposure.

This requirement also clearly signifies the need to have contractors who work on the building properly trained or inducted in advance, to sign the register and log the visit on each occasion.

Awareness training for staff will take the form of site specific induction information and regular follow up briefings, at agreed intervals or when there is an actual or planned major change to asbestos content.

AGENCY OPERATIONAL CONSIDERATIONS

In recognising that employees may have cause to work outside the normal workplace, agencies need to ensure that safe work practices also exist for those occasions when an employee is in the field. The definition of workplace is broad, extending to places where employees work or are likely to be in the course of their work.

The agency AMP needs to document procedures for employees to work safely in places other than the office. For example, an employee required to make visits to demolition sites for purposes of checking compliance with safe work practices by contractors, will need specific safety procedures and protective equipment. In that case, the demolition site becomes the workplace and as for all other workplaces, the employer has an obligation to identify hazards, assess the risks and provide safe work practices. This is clearly more difficult to achieve when control over the premises does not rest with the employer.

There will be many circumstances which agency personnel encounter while working away from the usual building and it is necessary to comprehensively review common situations and establish procedures for recognition of potential asbestos hazards and working with them.

REVIEW OF THE ASBESTOS REGISTER AND AMP

In accordance with section 9.3.1 of the Code, the Asbestos Register, including any risk assessments, should be reviewed every 12 months or earlier where:

- A risk assessment indicates the need for reassessment as per section 10.1 of the Code, or
- Any ACM has been disturbed or removed.

Section 10.1 of the Code provides that:

- The person with control, in consultation with workers and/or their representatives, should review the risk assessment, and any measures adopted to control the risks, whenever:
 - There is evidence that the risk assessment is no longer valid;
 - There is evidence that any control measures are not effective;

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- A significant change is proposed for the workplace or for work practices or procedures relevant to the risk assessment;
 - There is a change in the condition of the ACM; or
 - The ACM has been removed, enclosed or sealed.

A visual inspection of identified ACM should be undertaken by a competent person as part of any review.

The ASC has developed a guideline to allow agencies to apply a review interval greater than twelve months. This will require documentation of the decision in the AMP and include the basis for the decision.

The basis for the decision should give consideration to:

- risk ranking;
- the strength of control measures;
- the ability to respond with remedial action in the event of an incident; and
- the cost of review.

SUMMARY

The development of an AMP can be a daunting task. These notes are intended to guide agencies with relatively simple workplaces to understand and build a step by step planning process. Agencies should understand the process of asbestos management and be aware that a compliant AMP is not only mandatory, it is good management practice.

Matching of agency skills to the complexity of the plan is important and agencies should have full preparedness to outsource the development of the AMP.

Further advice on the development of an agency Asbestos Management Plan may be gained by contacting the Asbestos Steering Committee through the Executive Officer on 94402362.