

**STANDING COMMITTEE ON PUBLIC ADMINISTRATION
(Asbestos Management in Western Australian Schools)**

**~ Responses to Questions ~
(Meeting 24 October 2007)**

Q1 *Have inspection and risk assessment surveys ("surveys") of asbestos containing materials (ACM) in all Western Australian schools been conducted in 2007? How many schools were surveyed?*

A1 765 Western Australian government schools were inspected and an asbestos risk assessment conducted. We are advised by DHW that four schools; Hopetoun Primary School, Leeming Primary School, Oberthur Primary School and Onslow Primary School were, for some reason, not assessed. This oversight is in the process of being corrected.

Q2 *When were the surveys conducted and completed?*

A2 The surveys were commenced in November 2006 and were completed in July 2007. The Asbestos Management Plans, including the risk assessments, were despatched to schools in August 2007

Q3 *How were the surveys conducted? Please explain the methodology followed.*

A3 Contractors were engaged through the Department of Housing and Works (DHW) and trained to fulfil the "competent person" criteria expressed in the *Code of Practice for the Management and Control of Asbestos in Workplaces [NOHSC: 2018 (2005)]*. These contractors visited each site and visually assessed the **condition of ACM** in all buildings and the **potential for disturbance**, against defined assessment criteria. The results were then forwarded to DHW and recorded in an electronic database. Any material that was not confirmed as ACM through visual inspection but looked as though it could be, was presumed to be ACM and assessed as such.

RISK CONTROL MEASURES

Risk Rankings 1 and 2

Remove source of disturbance or otherwise take immediate action to negate any potential health risk.

Risk Rankings 3, 4 and 5

Program remedial action to ensure potential health risks do not arise.

Risk Rankings 6, 7, 8 and 9

Monitor and manage in accordance with the Review of Risk Assessment.

CONDITION OF MATERIAL	POOR	Risk Ranking 6 <i>Unsealed or coating damaged, Severely weathered</i> <i>Low Probability of Disturbance</i>	Risk Ranking 3 <i>Unsealed or coating damaged, Severely weathered</i> <i>Medium Probability of Disturbance</i>	Risk Ranking 1 <i>Unsealed or coating damaged, Severely weathered</i> <i>High Probability of Disturbance</i>
	FAIR	Risk Ranking 8 <i>Unsealed or Coating deteriorated, Moderately weathered</i> <i>Low Probability of Disturbance</i>	Risk Ranking 5 <i>Unsealed or Coating deteriorated, Moderately weathered</i> <i>Medium Probability of Disturbance</i>	Risk Ranking 2 <i>Unsealed or Coating deteriorated, Moderately weathered</i> <i>High Probability of Disturbance</i>
	GOOD	Risk Ranking 9 <i>Sealed, coating in good condition and /or Unweathered and surface sound and well bound.</i> <i>Low Probability of Disturbance.</i>	Risk Ranking 7 <i>Sealed, coating good condition and /or Unweathered and surface sound and well bound.</i> <i>Medium Probability of Disturbance</i>	Risk Ranking 4 <i>Sealed and coating good condition and /or unweathered and surface sound and well bound.</i> <i>High Probability of Disturbance</i>
		LOW	MEDIUM	HIGH
		PROBABILITY OF DISTURBANCE <i>(During Normal Operational Use)</i>		

Q4 *Were all ACM given a risk rating? Were any ACM given a risk rating of 9, which requires immediate removal of the ACM. Where were these ACM located, that is, at what schools and in what building materials (fences, ceilings etc)? Approximately what percentage of ACM was given a risk rating of 6 and above, which requires the responsible party to remove when practicable or take remedial action?*

A4 All ACM identified was given a risk ranking of 1 to 9, with 1 being the high risk and 9 being the lowest risk. This ranking system is the current version used for the assessment in all schools. At the completion of the risk assessments, there were **64 components** with risk rankings 1 and 2. The

majority related to trees and vegetation brushing against ACM components and asbestos debris as a result of breakages of building components over time. Action was taken to address all the high risk items and as a result, only two items remain to be resolved. These are;

- One ACM component still has a risk ranking of 1. This is at Gnowangerup District High School where a bench in Manual Arts was found to have ACM heat boards. An order has been placed with a supplier and this material will be replaced in a few weeks. In the meantime, the school has been requested to stop using the bench.
- One ACM component still has a risk ranking of 2. This is at Esperance Senior High School Annexe at Salmon Gums – Shed Walls at House 3.

Over 21,000 ACM components were identified across all schools during the risk assessments, with 481 or approximately 2 % of these having a risk ranking of 1 – 4. (equivalent to risk ranking 6, 7, 8 and 9 in the previous scale).

Q5 What asbestos maintenance, repair and removal work was undertaken?

A5 No asbestos structural maintenance, repair or removal work has been undertaken at this point in time. Most of the high risk rankings were in relation to trees and shrubs rubbing against ACM or the finding of asbestos cement debris due to breakage. Action has been taken to remove this hazard by pruning back the foliage from the ACM or collecting and disposing of the debris.

- 1 - *Trees and vegetation brushing against ACM components that were in poor or fair condition.*
- 2 - *Asbestos debris resulting from breakages of ACM components over time. Action has been taken and to date, in 62 cases, remedial action has since been taken and the risk rankings for these components have been adjusted accordingly.*

Q6 Was air monitoring for the presence of asbestos fibres conducted? If so, where was it done? Did any asbestos fibre counts exceed the national standard?

A6 No air monitoring has been undertaken in relation to the risk assessments as this was not considered necessary. Any areas where a higher risk was identified were dealt with by removing the causal factor (e.g. tree branches) rather than go through the air monitoring process to confirm what is obvious.

Q7 *Is an updated global Asbestos Register of ACM in schools with risk ratings recorded being maintained? Who enters the risk ratings and other data into the Asbestos Register? Who maintains the Asbestos Register? Does each school keep an Asbestos Register onsite?*

- A7
- Yes; a global Asbestos Register of ACM with risk ratings is maintained.
 - Any entries into the Asbestos Register are centrally controlled by DHW and the relevant section is forwarded to the school to update the site register.
 - The Asbestos Register is maintained centrally by DHW and on site by the school Principal.
 - Each school has an Asbestos Register on-site.

The database is updated only if major removal or demolition occurs e.g. all the eaves to a block are replaced with non ACM material. It is not intended that the database be updated for replacement of individual panels of ACM as information in the database is not held at that level. It is held at the level of building blocks, elevations, whole rooms etc.

Q8 *When will the next survey of schools take place? How often are surveys conducted?*

- A8
- It is intended that the next survey will be conducted in 2009/10 and on a 2 to 3 year basis thereafter.

Q9 *What is being done in relation to asbestos risks reported and detected between surveys?*

- A9
- Any damaged ACM is reported through the normal "faults" process and is attended to according to the Asbestos Management Plan. Asbestos issues are treated as a *Priority 1 fault*.

Q10 *Who conducted the asbestos surveys? What minimum qualifications did these persons have? Was each person who removed asbestos licenced to do so?*

- A10
- Contractors engaged by DHW.
 - Contractors did not necessarily require formal qualifications as such but it was preferred they had a reasonable knowledge/background in Occupational Safety & Health/Risk Management and/or a building background.
 - No person was engaged to remove any ACM, in relation to the risk assessment process.

All contract assessors had to undergo formal training prior to conducting the assessments to ensure consistency in the application of the assessment methodology.

Q11 *Did your department conduct information and training sessions for persons who surveyed, handled or removed asbestos in 2007? Are these sessions held regularly?*

A11 In relation to the risk assessments, contractors undertook a comprehensive training course in October 2006 to address the issue of "Competent Person", as required by the Code of Practice. No ACM was handled or removed by the survey contractors. DHW is responsible for ensuring contractors who work on ACM in schools, are competent to do so. Training will be provided to risk assessors as and when the need arises.

Q12 *Does your Department have personnel in the field who regularly monitor the work quality and practices of people who survey, handle or remove asbestos at schools?*

A12 The DHW is best placed to answer this question but with regard to work quality and practices in relation to asbestos removal, the Department's Principal Consultant Environmental Health conducts monitoring operations in respect to the larger Capital Works projects that involve ACM. DHW undertook QA checks on many assessments conducted and confirmed consistency in the findings.

Q13 *Regarding the methodology of the surveys, why was this methodology followed?*

A13 The methodology was developed jointly with DHW and was based on the factors that created or mitigated against risk in relation to asbestos i.e. the **condition** of the ACM and the **potential for disturbance**. If the material is in good condition and there is no potential for disturbance, the risk is obviously negligible; poor condition and a likelihood of disturbance clearly mean the risk is higher. This is based on standard Risk Management practice for the nature of the hazard.

Q14 *I refer to Mr. Piers Dudman's letter dated 26 August 2007 (copy enclosed). What is your response to Mr. Dudman's assertions? What is your response to Mr. Dudman's statement that "asbestos kills people; One fibre is enough"?*

A14 The Department, as does the general scientific community, maintains the position that air monitoring is a valid risk assessment tool. It can be employed to assess potential risk following the identification of a particular

hazard and/or to validate a control measure to remove or reduce a hazard. Both the scientific and medical communities are in agreement; that the incidence of asbestos related disease is **dose/response related**. That is; occurrence of an asbestos-related disease is directly related to the amount of asbestos fibres inhaled and the extent of exposure.

Q15 *Are surveys conducted in compliance with the Code of Practice for the Management and Control of Asbestos in Workplaces [NOHSC: 2018 (2005)].*

A15 Yes; they are in compliance with the Code of Practice.

Q16 *Is there a clear delineation of roles and responsibilities between different government departments and officers in relation to the management of ACM in schools? Please explain the respective roles of the Department of Housing and Works and the Department of Education and Training.*

A16 Yes; there is clear delineation between the roles and responsibilities of officers within DHW and DET. DET is responsible for the strategic management of ACM in schools, which involves the establishment of policy and procedures that compliment legislative requirements. DHW's role is to engage contractors who are competent to work with ACM, in accordance with policy and procedures, and to ensure legislative requirements are complied with. DET's role is primarily **Strategic** and DHW's role is **Operational** although the DET's Principal Consultant Environmental Health does conduct some operational tasks such as site inspections and monitoring of contractor performance on larger projects.

Q17 *Does your Department's Management Plan address the concerns in the Auditor General's Fourth Public Sector Performance Report (Report 9, September 2007)? The Auditor General found that the Department of Housing and Works' Management Plan lacked a communication strategy, timetable for action, management options and reasons for decisions and the Department of Education's draft Management Plan lacked a timetable for actions, management options and reasons for decisions.*

A17 DET has explained its position on these matters to the Auditor General in a letter dated 15 August 2007. We would like to table a copy of that letter.

In the DET Asbestos Management plan (Section 2 – Background), reference is made to the fact that there is no immediate plan for a major asbestos removal program, although this **might** be possible if there was dedicated funding. Whilst the ACM is serviceable and does not present a health risk, it is left in-situ however if the material is no longer functional

and has the potential to present a health risk, it will be removed and replaced with a non-asbestos product.

Q18 *Has asbestos risk management training for new Principals, as part of the induction process, taken place in 2007? Has there been periodic refresher training for existing Principals?*

A18 Existing Principals were trained in their role and responsibilities in relation to Asbestos Management in schools from November 2006 to May 2007. Refresher training will be provided in 2008. It is intended that new Principals will be provided with this training in their induction briefing at the start of the 2008 school year.

Q19 *Do Western Australian school buildings comply with the requirements of the Occupational Safety and Health Regulations 1996?*

A19 Assuming the question is more specifically referring to the management of asbestos in schools buildings, Western Australian school buildings do comply with the OSH Regulations 1996.