

**STANDING COMMITTEE ON PUBLIC SECTOR ADMINISTRATION
ASBESTOS MANAGEMENT OF WESTERN AUSTRALIAN SCHOOLS IN 2007
RESPONSES FROM DEPARTMENT OF HOUSING AND WORKS**

1. 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?

Inspections and risk assessments of ACMs in all Western Australian schools have been completed except for four schools listed below which will be completed by mid November.

*Onslow Primary School
Leeming Primary School
Oberthur Primary School
Hopetoun Primary School*

Information on all completed surveys was entered into a database. Individual reports for each school were produced from the database and despatched to schools and incorporated into each school's asbestos management plan.

The total number of schools surveyed so far is 765.

2. When were the surveys conducted and completed?

Surveys commenced in November 2006 and continued progressively through to July 2007. ACM registers and school asbestos management plans were despatched to the 765 schools by the end of August 2007.

3. How were the surveys conducted? Please explain the methodology followed.

Surveys were based on visual inspections of building components. Sampling and laboratory testing and air monitoring were not an integral part of the surveys. Inspectors applied their experience and familiarity with building products to decide whether a building component had ACM. If the inspector was not sure whether a component had ACM, then the presumption rule always applied and the component was presumed to have ACM. For example, masonry, timber and metal components clearly do not have ACM and are easily identifiable as such. However, painted wall lining or eaves lining material could be made from a variety of building products. Examples are gyprock, plasterboard, masonite, fibre cement, asbestos cement, etc. Where it was not possible to be absolutely sure that a building component did not contain ACM, then it was presumed that the product was ACM.

Each ACM component was then assessed in terms of its physical condition and probability of disturbance in its normal operational environment. Condition was assessed as good, fair or poor. Probability of disturbance was assessed as low, medium or high.

Inspectors collected all the information on standardised proformas. These were handed in to DHW progressively so that information could be entered into a computerised database. The database is able to produce reports by schools, listing all ACM components, locations of components and risk rankings of components.

For each ACM component, its condition and probability of disturbance were used to derive the component's risk ranking in accordance with a risk matrix. The Risk Matrix and Control Measures are as follows.

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

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.

- 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 were given a risk rating of 6 and above, which requires the responsible party to remove when practicable or take remedial action.

All identified ACMs were given risk rankings ranging from 1 – high risk to

9 – low risk

This question is framed around risk ranking 9 being high risk and risk ranking 1 being low risk. This is the reverse of the scale now in use. The question was probably based on the risk ranking scale used in the Carine Senior High School asbestos register prepared in early 2006. Since then, DHW and DET have reviewed the risk ranking scale and aligned this with other risk ranking models such as the one used by DHW for Building Condition Assessments.

The majority of risk rankings were 9 – low risk.

The control measures require all ACMs with risk ranking 1 and 2 to receive immediate attention.

When the survey results were first completed, there were 64 components with risk rankings 1 and 2. The majority related to trees and vegetation brushing against ACM components and asbestos debris resulting from breakages of ACM components over time. Action was taken to address all the high risk items and as a result, only two items remain to be completed.

These are

- one ACM component still has a risk ranking of 1. This is at Gnowangerup District High School – heat boards in Manual Arts. This material will be replaced in a week. An order has been issued to a supplier. 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.*

Of over 21,000 ACM components identified across all schools, 481 or approximately 2 % of these have a risk ranking of 1, 2, 3 or 4. (equivalent to risk ranking 6, 7, 8 and 9 in the previous scale)

5. What asbestos maintenance, repair and removal work was undertaken?

In a number of cases (64), high risk rankings of ACM components primarily resulted because of

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.

3. Was air monitoring for the presence of airborne asbestos fibres conducted? If so, why and where was this done? Did any asbestos fibre counts exceed the national standards?

Asbestos air monitoring was not conducted as part of the ACM surveys of schools. (refer to survey methodology discussed in item 3)

7. 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?

DHW maintains a global register (computerised database) on behalf of DET.

DHW enters the risk rankings and other data into the database.

DHW maintains the database.

Each school keeps a copy of its school specific register which comes off the database.

8. When will the next survey of schools take place? How often are surveys conducted?

The Department of Education and Training is responsible for this matter and will address this at the later session.

9. What is being done in relation to asbestos risks reported and detected between surveys?

DHW provides a 'Breakdown Repair' service to DET and other Agencies to respond to urgent high risk incidents, including asbestos cleanup. For example, ACM building components may be damaged by falling trees, vandals or accidental damage. Schools report these incidents to their DHW Call Centres for immediate attention. A DHW approved contractor is despatched immediately to clean up ACM debris and to ensure that risks are controlled.

10. Who conducted the asbestos surveys? What minimum qualifications did these persons have? Was each person who removed asbestos licensed to do so?

The surveys were arranged by the Department of Housing and Works and conducted by eight inspectors. The inspectors were not DHW employees. They were contracted in to do the surveys. All inspectors had to be deemed competent persons to enable them to conduct the surveys. The prerequisites for persons wishing to provide this service were as follows.

Experience in performing building condition assessments

Or

Experience in Occupational Safety and Health Risk Management

In addition, all inspectors had to attend mandatory training prior to conducting the surveys.

The training focused on the methodology to ensure that all inspectors would do the surveys in a consistent manner. Training included substantial theory as well as practical application and a test. Accreditation certificates were issued to persons who attended the training course and passed the test.

The surveys did not involve any asbestos removal. However, when asbestos removal work is required, this is done in accordance with approved work practices.

11. Did your Department conduct information and training sessions for persons who surveyed, handled or removed asbestos in 2007. Are these sessions held regularly?

Yes we did.

Surveys

DHW in conjunction with DET conducted training for all inspectors prior to the ACM surveys commencing. A further training session was conducted during 2007 in order to increase the pool of competent persons able to conduct ACM surveys. Further training sessions will be provided to increase the pool of competent person.

Handling and Removal

DHW recently conducted an information session for contractors who do asbestos related work at schools in the metropolitan area. The session focused on the rollout

of ACM registers at schools. Contractors were advised that they must view the asbestos registers before commencing any work and that they must also sign an acknowledgement in a log book confirming that they have checked the register. DHW will continue to provide information packages and awareness sessions to all contractors that are involved in asbestos related work at schools.

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

Yes, we do.

Surveys

While the ACM surveys were being conducted, DHW personnel did some quality assurance site checks on completed surveys and found these correctly represented the site conditions.

Handling and Removal

DHW has a team of quality service personnel who regularly visit schools and other Government facilities to do quality control checks on work carried out by contractors. The check also covers asbestos related work.

13. Regarding the methodology of the surveys, why was this methodology followed?

The Department of Education and Training is responsible for this matter and will address this at the later session.

14. 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"?

Mr. Dudman's letter discussed the view that one asbestos fibre alone can kill. DHW's response to this is that scientific and medical communities disagree with this theory. Victims of asbestos diseases usually have had very high exposure levels to asbestos fibres over a long period.

Mr. Dudman questioned the advice given in earlier correspondence that 'air sampling for the presence of airborne asbestos fibres is the only truly objective scientific method of confirming whether there is a risk from Asbestos Containing Materials.'

DHW's response to this is that control measures are already in place to minimize the release of asbestos fibres at schools. Air monitoring serves to confirm that these control measures are appropriate and that they provide the desired outcome.

Mr. Dudman disputed the validity of air testing at Carine Senior High School as a means of confirming whether there is a risk in relation to the asbestos fascias at the school.

DHW's response is that control measures are already in place at Carine Senior High School to minimize the release of fibres from the asbestos fascias and the success of these control measures has been confirmed through earlier air testing.

15. Are surveys conducted in compliance with the Code of Practice for the Management and Control of Asbestos in Workplaces {NOHSC: 2018 (2005)}?

The Department of Education and Training is responsible for this matter and will address this at the later session.

16. 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.

The roles and responsibilities of DHW and DET in respect to ACM management at schools are clear.

Under Worksafe Regulations, DET has control of its school and workplaces and is therefore responsible for the management of asbestos matters. DET is therefore responsible for developing the policy on ACM management at schools in response to compliance with Regulations etc.

DHW implements any action required by DET.

Example – DET confirms the need to prepare asbestos management plans for schools and determines the frequency of reviews. DHW arranges the ACM surveys on behalf of DET, creates a database and designs the output reports, engages inspectors to do the surveys, arranges data entry, etc.

17. Does your Department's Management Plan address the concerns expressed 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 decision.

The first part of the question refers to the Department of Housing and Works' asbestos management plan. The Department has two asbestos management plans, neither of which govern our activities when carrying out asbestos related work for other government agencies. Both plans address the management of asbestos in either DHW work places or DHW managed residential properties.

The second part of the question refers to the Department of Education and Training's draft management plan. As this plan is the responsibility of that agency, this part of the question should be referred to DET.

18. 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?

The Department of Education and Training is responsible for this matter and will address this at the later session.

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

The Department of Education and Training is responsible for this matter and will address this at the later session.