

Mr Glen Francis
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Dear Glen

I refer to your email of 6 August 2007 regarding your Management of Asbestos Related Risks Audit and the resultant draft management letter. Thank you for the opportunity to provide feedback.

Comments relating to the draft management letter as follows:

- The Asbestos Management Plan (AMP) intentionally does not detail the management options in relation to Asbestos Containing Materials (ACM) in schools as these are generally not practical. Options are limited to sealing, encapsulation or removal. Sealing involves painting the material and whilst this is done and will continue to be done in situations that warrant such action, wholesale painting is not recommended as the asbestos cement surfaces cannot be prepared for painting (i.e. rubbing/sanding back), making it difficult to get a proper finish that will last without requiring frequent repainting.
- Encapsulation is the application of a special adhesive undercoat followed by painting. This is an expensive operation and has not been a recommended practice in government since the late 1980's. Total removal has been estimated to cost in excess of \$1 billion in the case of the Department of Education and Training and has the potential for a flow-on effect to other government agencies such as the Department of Housing and Works (DHW). The logistics of such an exercise also make it highly impractical as the school would most likely have to close in order for the removal work to take place. It is for these reasons a timetable for management options has not been considered.
- The AMP is currently being finalised, will be signed off by me as Deputy Director General Finance and Administration and will be forwarded to all schools by the end of August 2007. The AMP includes an Asbestos Register.
- Regulation 5.43 of the Occupational Safety and Health Regulations refers to the Code of Practice for the Management and Control of Asbestos in Workplaces. Section 9.5.1 of the Code states that warning signs should be posted at the main entrance to workplaces that contain ACM. Given the fact that such signs would be placed at the front of schools, this would be counter productive given the highly

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- emotive nature of this issue. The Department has addressed the matter by placing the Asbestos Register at the front counter in each school and contractors are instructed by DHW and school staff to refer to the Register to identify if their intended work is likely to impact on ACM. This approach is supported by the Whole of Government Asbestos Steering Committee in that it meets the intent of the code. The committee has a representative from WorkSafe WA.

Yours sincerely

PETER McCaffrey
DEPUTY DIRECTOR GENERAL
FINANCE AND ADMINISTRATION

15 August 2007