Respondent No: 11 Login:	Responded At: Last Seen: IP Address:	Aug 25, 2023 08:40:59 am Aug 24, 2023 22:27:00 pm

 $\ensuremath{\mathsf{Q4}}\xspace$. This submission is written on behalf of an:

Organisation



Q8. Publication of submission (select one)

Publish my submission online anonymously

Q9. Would you like to complete the submission online or upload a document?

I would like to complete an online submission

Q10. Do you have a clear understanding of the definitions of a competent person for asbestos-related tasks? How could any misunderstandings be addressed or clarified?

No. Specific clarification of what type of training is adequate would be very helpful. A direction to a specific unit of competency would remove ambiguity from the situation

Q11. Do you see a benefit in aligning the training, qualification and experience requirements of competent persons, licensed asbestos assessors and asbestos removal supervisors for asbestos-related tasks? If so, what do you think the training, qualification and experience requirements should be? Please provide information and reasons to support your response.

I believe the VET course requirement should be made more specific and made universal across all the levels as the risk of exposure to asbestos exists at all levels, although I appreciate the risk increases as you move into removal of larger quantities and friable asbestos does increase this risk. The same base knowledge should be applicable at all levels. I also feel that requirements for experience at all levels should be avoided, as it may disadvantage new workers in being able to gain experience in working with asbestos, or access roles where identification and removal of small amounts of asbestos is required

Q12. Are there any other issues regarding the definition and requirements of competent persons for asbestos-related tasks that should be considered? Please provide information and reasons to support your response.

The term "competent person" across all WHS Regulation raises a large amount of confusion for both workers and managers. I also believe it encourages unqualified personnel to undertake potentially hazard tasks, such as asbestos removal, because they have "done it before" and have "relevant experience" but have no evidence of having been trained in correct techniques. This poses a risk to not only themselves but others working in the area. It could also encourage employers to avoid spending money on training costs and try to provide this training internally, which again may not result in workers being actually competent

Q13. Is there any other additional feedback you would like to provide?

No thank you

Q14. Please upload your submission document or	not answered		
any supporting information to your submission			
here (optional)			
Q15. Terms and conditions	I have read and understand the Engage terms and conditions		
	(https://engage.swa.gov.au/terms) for making this submission.		