



Respondent No: 1

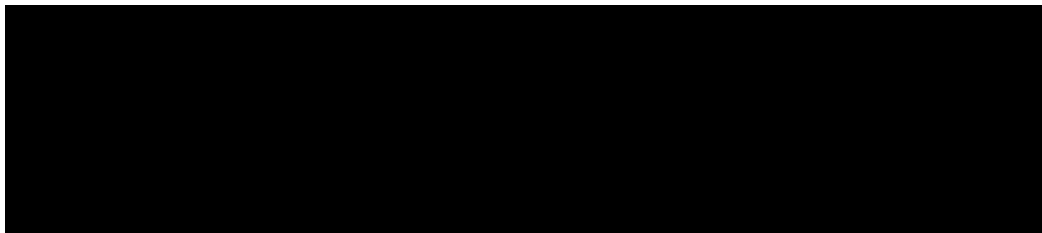
Login: [REDACTED]

Email: [REDACTED]

Responded At: Sep 22, 2023 17:24:11 pm

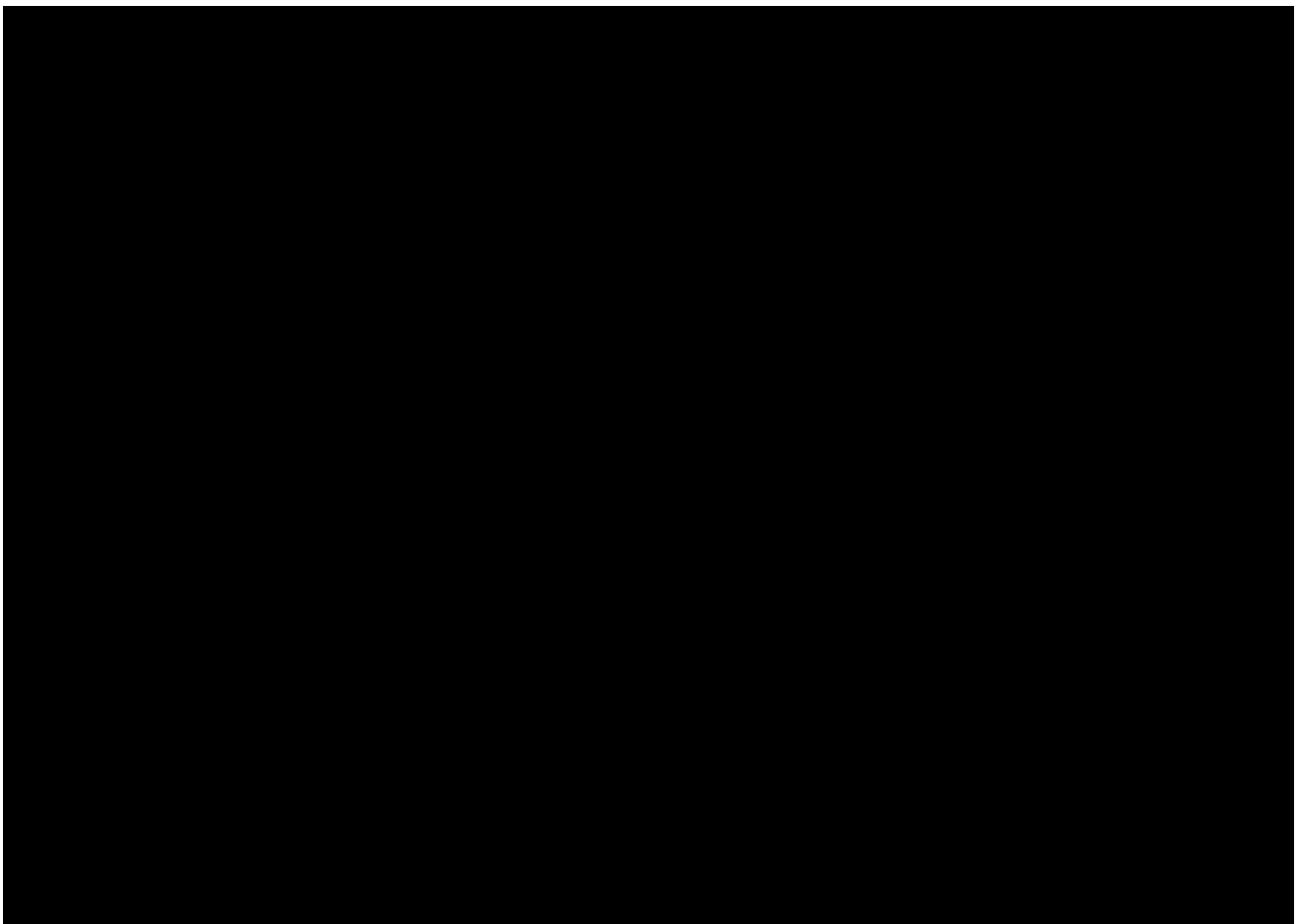
Last Seen: Sep 22, 2023 07:16:08 am

IP Address: [REDACTED]



Q4. 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?

Yes, we have a clear understanding of the current definition of a competent person for asbestos related tasks. In addition, the following comments are made: 1) In general terms and in our knowledge of the Asbestos Assessor industry (consultancy) if an organization is not NATA accredited then the competency of a person conducting asbestos related tasks could be questioned. There, is in general, often a lack of knowledge, competency and accuracy in undertaking the work of that requires a competent person for asbestos related tasks. This relates to the provision of Licensed Asbestos Services for both Class A and Class B asbestos work and the requisite laboratory processes, namely in fiber counting (Membrane Filter Method). 2) The requirement to have "a tertiary qualification in occupational health and safety, occupational hygiene, science, building, construction or environmental health" is not in itself a pre-requisite for success in performing the specified task in relation to asbestos management. Indeed, it is strongly suspected that most in these tertiary fields do not know of asbestos and its risks and how to manage the WHS regulatory requirements of asbestos management.

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.

There would be limited benefit in aligning training in the listed roles, excepting for general Asbestos Awareness Training (Reg 445) being a core and initial competency. However, there is a crucial benefit in ensuring that there is an understanding of each other's role in the asbestos management process i.e assessor and removal supervisor). Further, ideally there needs to be a differentiation between the competency of a Licensed Asbestos Assessor conducting work for ACM removal (monitoring, clearance and lab work) and a competent person conducting an Audit of a building for the purposes of an Asbestos Register. They are two exclusively differing fields of competence.

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.

1) [REDACTED] has begun conversations with the UK Asbestos Training Association (UKATA) about training in asbestos management as the UK training is seen to be superior to the training offered in Australia. 2) CPCCE5001 Conduct air monitoring and clearance inspections for asbestos removal work does not cover the Laboratory process (Membrane Filter Method); it talks of it only. Understanding what the Membrane Filter Method requirements are (as a minimum) is fundamental to a Licensed Assessor role to comply with Reg 475 (6) "...must use the membrane filter method..."

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

not answered

Q14. Please upload your submission document or any supporting information to your submission here (optional)

not answered

Q15. Terms and conditions

I have read and understand the Engage terms and conditions (<https://engage.swa.gov.au/terms>) for making this submission.