

Asbestos Compliance Codes – Public Comment Submission Form			
Note: Areas marked with an asterisk (*) denote required information.			
Type of submission *	Individual <input checked="" type="checkbox"/>	Organisation <input type="checkbox"/>	
Organisation name * (where applicable)	Click here to enter text.		
First name *	Stephen		
Last name *	Burnett		
Email address *	Click here to enter text.		
Postal address	Click here to enter text.		
Postcode *	Click here to enter text.		
State *	Choose an item.		
Do you consent to WorkSafe publishing your submission?*	<input checked="" type="checkbox"/>	Yes – WorkSafe may publish this submission with my organisation's name/my name.	
	<input type="checkbox"/>	Yes – WorkSafe may publish my submission, but please publish without my name.	
	<input type="checkbox"/>	No – WorkSafe may not publish my submission due to confidentiality reasons.	
Note: All submissions will be treated as public documents and will be published online unless clearly identified as being confidential. Where the submission is from an organisation, WorkSafe will publish the organisation's name not the author's name.			
Does your submission contain personal information of any third party individual/s?*	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, have you obtained consent from the third party individual/s to include their personal information in your submission?*	<input type="checkbox"/> Yes <input type="checkbox"/> No
Note: If you have not obtained consent from the third party individual/s, WorkSafe may elect not to publish your submission or may redact third party information from your submission.			
Can WorkSafe contact you about your submission?*		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Note: WorkSafe may use the information you have provided to inform you of further development of the proposed compliance codes.			

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Proposed Removing Asbestos in Workplaces Compliance Code

Please provide your comments on the proposed *Removing Asbestos in Workplaces Compliance Code*. Where possible, please indicate the section of the code you are commenting on. General comments about the code are also welcome.

General comments
Click here to enter text.

Specific comments	
<i>Introduction</i>	Click here to enter text.
<i>General requirements of Part 4.4 of the Occupational Health and Safety Regulations 2017</i>	Click here to enter text.
<i>Prohibitions</i>	Click here to enter text.
<i>Asbestos removal work</i>	Click here to enter text.
<i>General requirements for all asbestos removal work</i>	Click here to enter text.
<i>Additional requirements for asbestos removal licence holders</i>	In reading the Compliance code it appears that an Asbestos licence holder can only use employees fro asbestos removal work (Excluding excavator operators) to ensure they have medicals and proper training, In many situations where an asbestos licence holder does not have enough workers, it appears that they can not engage another licence holders employees (through the second licence holder) to work for them under the one Notification to Worksafe.

<p><i>Additional requirements for Class A asbestos removal work</i></p>	<p>Click here to enter text.</p>
<p><i>Paraoccupational air monitoring and clearance inspections</i></p>	<p>An issue which has been evident for a long time is the issuing of clearances and certificates before the removal of barriers etc for class B removals. It does not appear that the Asbestos Removal Supervisor needs to receive a clearance certificate (ie a document) before the removal of signage, and barriers etc. I believe it should be made clearer what must be given to the supervisor of the asbestos removal work (not just the person who commissioned the work) as notification that they can finish up and remove signage and barriers. Is a verbal notification acceptable with a follow up letter in a couple of days to the person who commissioned the work (which means the removalist may not get a copy) or does the removalist need to get any documentation at all with regards to the clearance/</p>
<p><i>Independent persons</i></p>	<p>Click here to enter text.</p>
<p><i>Asbestos-contaminated soil</i></p>	<p>A new aspect of these regulations and Compliance code is the fact for Asbestos contaminated soil, "Independent contactors" can be used. I do not think the Compliance code is clear enough or provides enough information on the following: Adequate training. - Does the operator of the excavator need to have Class A Asbestos Training or general awareness training? Required PPE and RPE while on the excavator and in the exclusion zone.- There is no guidance, Does the person need to have Full face P2 or P3 RPE, or is a dust mask OK? What happens if the excavator is small i.e. only a 2.7t machine and the operator is close to the excavation, verses using a 33t machine and in an air-conditioned cabin. Does the operator in the second example need coveralls etc? What happens to the excavators air-conditioning system. Does it have to be isolated? or a HEPA air filer rated for Asbestos? Decontamination of the excavator: There is no guidance on the decontamination of the excavator to remove dust and /or mud. Does the excavator need to be washed down in a bunded area made of plastic lined soil and the water collected for disposal as contaminated waste? what happens to the air conditioner air filter on the excavator? Medical Assessments of Independent excavator operators.- Are medical</p>

	<p>assessments required and who is required to ensure it is carried out? The License holder engaging them or the owner/operator of the excavator? As a person who has managed many Asbestos contaminated soil works, I believe the opening up of using independent Contractors has the possibility of serious shortfalls. and the Compliance Code is giving very little guidance on what the requirements are for effectively managing the training, operation, PPE & RPE and Decontamination requirements. Especially as it is a new part of the Regulations and Code.</p>
<i>Appendices</i>	<p>Click here to enter text.</p>