NSW Department of Education

Asbestos Management Plan

NSW Department of Education

2025

NSW GOVERNMENT

Acknowledgement of Country

The NSW Department of Education acknowledges the Traditional Custodians of the lands where we work and live. We celebrate the diversity of Aboriginal peoples and their ongoing cultures and connections to the lands and waters of NSW.

We pay our respects to Elders past, present and emerging and acknowledge the Aboriginal and Torres Strait Islander people that contributed to the development of this plan.

Asbestos Management Plan

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Additional Information and Support

For further advice in relation to this Asbestos Management Plan:

- Email schoolinfrastructure@det.nsw.edu.au

Document Control

Version	Date Released	Next Review Due	Approved By	Amendment
1	September 2025	September 2030	Deputy Secretary, Chief People Officer	New document created

Contents

Definitions

Term	Meaning
Air monitoring	Air monitoring involves sampling airborne asbestos fibres to assist in assessing exposure to asbestos and the effectiveness of implemented control measures. It must be conducted in accordance with the Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Dust, 2nd Edition [NOHSC: 3003 (2005)]. It is a NSW Department of Education requirement that air monitoring is performed when any form of asbestos disturbance works is undertaken.
Airborne asbestos	Any fibres of asbestos small enough to be made airborne. For the purposes of monitoring airborne asbestos fibres, only respirable fibres are counted.
Asbestos	The asbestiform varieties of mineral silicates belonging to the serpentine or amphibole groups of rock-forming minerals, including actinolite asbestos, grunerite (or amosite) asbestos (brown), anthophyllite asbestos, chrysotile asbestos (white), crocidolite asbestos (blue) and tremolite asbestos, or a mixture that contains one or more of these.
Asbestos containing dust (ACD)	Dust or debris that has settled within a workplace and is, or is assumed to be, contaminated with asbestos.
Asbestos containing material (ACM)	Any material or thing that, as part of its design, contains asbestos.
Asbestos Removal Control Plan (ARCP)	A document that identifies the specific control measures that will be used to ensure that workers and other people are not at risk when asbestos removal work is being undertaken.
Asbestos waste	Any waste that contains asbestos. This includes asbestos or ACM removed and disposable items used during asbestos removal work including plastic sheeting, disposable tools and personal protective equipment.
Asbestos-related work	For the purpose of this plan, asbestos-related work is any work involving the planned disturbance of asbestos including asbestos removals.
Asset Services Officer (ASO)	School Infrastructure staff who perform a range of asset services including the delivery of capital works projects and all aspects of facilities management.
Competent person	In relation to carrying out clearance inspections under WHS Regulation clause 473—a person who has acquired through

	training or experience the knowledge and skills of relevant asbestos removal industry practice and holds: - A certification in relation to the specified VET course for asbestos assessor work, or - A tertiary qualification in occupational health and safety, occupational hygiene, science, building, construction or environmental health. For all other purposes — a person who has acquired through training, qualification or experience, the knowledge and skills to carry out the task. In relation to identifying asbestos, a competent person is: - Trained to handle and take asbestos samples, have the knowledge and experience to identify suspected asbestos and be able to determine risk and control measures. - Familiar with building and construction practices to determine where asbestos is likely to be present, and/or - Able to determine that material may be friable or non-friable asbestos and evaluate its condition. The department engages competent persons from the Hygienist Services Panel (SINSW1340-20) for the purpose of identifying asbestos or carrying out clearance inspections.
Contaminant	Any substance that may be harmful to health or safety.
Contamination of land	The presence in, on or under the land of a substance at a concentration above the concentration at which the substance is normally present in, on or under (respectively) land in the same locality, being a presence that presents a risk of harm to human health or any other aspect of the environment.
Control measure	In relation to a risk to health and safety, a measure to eliminate or minimise the risk.
Demolition work	Work to demolish or dismantle a structure, or part of a structure that is loadbearing or otherwise related to the physical integrity of the structure, but does not include: a. the dismantling of formwork, falsework, or other structures designed or used to provide support, access or containment during construction work, or b. the removal of power, light or telecommunication poles.
Duty holder	Any person who owes a work health and safety duty under the WHS Act including a person conducting a business or undertaking, a designer, manufacturer, importer, supplier, installer of products or plant used at (upstream), officer or a worker.
Exposure standard	For asbestos is a respirable fibre level of 0.1 fibres/mL of air measured in a person's breathing zone and expressed as a time-weighted average fibre concentration calculated over an

	eight-hour working day and measured over a minimum period of four hours in accordance with: – the Membrane Filter Method; or – a method determined by the relevant regulator.
Friable asbestos	Material that is in a powder form or that can be crumbled, pulverised or reduced to a powder by hand pressure when dry, and contains asbestos.
Hazard	A situation or thing that has the potential to harm a person. Hazards at work may include asbestos, noisy machinery, a moving forklift, chemicals, electricity, working at heights, a repetitive job, bullying and violence at the workplace.
Hygienist	Note: for the purposes of this plan, the hygienist will also be a competent person / licensed asbestos assessor.
In situ asbestos	Asbestos or ACM fixed or installed in a structure, equipment or plant but does not include naturally occurring asbestos.
Incident	An unplanned event that could result in an injury to a person or to a loss of, or disruption to, an organisation's operations, services or functions.
Independent	In relation to clearance inspections and air monitoring means: a. not involved in the removal of the asbestos. b. not involved in a business or undertaking involved in the removal of the asbestos, in relation to which the inspection or monitoring is conducted.
Licensed asbestos removalist	A person conducting a business or undertaking who is SafeWork NSW licensed under the WHS Regulations to carry out class A or class B asbestos removal work.
NATA-accredited laboratory	A testing laboratory accredited by the National Association of Testing Authorities (NATA), Australia, or recognised by NATA either solely or with someone else.
Naturally occurring asbestos (NOA)	The natural geological occurrence of asbestos minerals found in association with geological deposits including rock, sediment or soil.
Non-friable asbestos	Material containing asbestos that is not friable asbestos, including material containing asbestos fibres reinforced with a bonding compound.
Person conducting a business or undertaking (PCBU)	A person conducting a business or undertaking to the extent that the business or undertaking involves the management or control, in whole or in part, of the workplace. A person with management or control of a workplace does not include: – the occupier of a residence, unless the residence is occupied for

	the purposes of, or as part of, the conduct of a business or undertaking, or – a prescribed person. The NSW Department of Education is a PCBU and therefore has primary duty of care.
Respirable asbestos	An asbestos fibre that: – is less than 3 microns (µm) wide, and – is more than 5 microns (µm) long, and – has a length to width ratio of more than 3:1.
SAMP	School Asbestos Management Plan
Structure	Anything that is constructed, whether fixed or moveable, temporary or permanent, and includes: a. buildings, masts, towers, framework, pipelines, transport infrastructure and underground works (shafts or tunnels) b. any component of a structure c. part of a structure
Unexpected find	The identification of an asbestos hazard (or suspected asbestos hazard) which is not listed in the relevant asbestos register. Note that an asbestos find as part of hazard identification activities (such as an intrusive asbestos survey in preparation for a project) is not an unexpected find.
Volunteer	A person who is acting on a voluntary basis (irrespective of whether the person receives out-of-pocket expenses).
WHS Act	*Work Health and Safety Act 2011* (NSW)
WHS Regulation	*Work Health and Safety Regulation 2017* (NSW)
Worker	A person who performs paid work in any capacity for an employer, business or organisation (including but not limited to employees, apprentices, contractors and subcontractors) or who is unpaid (including but not limited to volunteers).
Works	For the purpose of this document, works means any planned activity performed by a worker, which involves the disturbance of building materials or ground surfaces.

1 Introduction

1.1 Background

NSW Department of Education manages a diverse asset portfolio including schools, childcare centres, and housing and community use facilities across the state. During regular planned maintenance or programmed works, asbestos or ACM may need to be repaired or removed from NSW Department of Education facilities.

The removal or repair of asbestos or ACM can cause concerns for students, employees and the wider community, due to the potential exposure risk of asbestos fibres that may be released during disturbances of ACM.

The NSW Department of Education has developed this AMP to provide transparency and consistency in how the NSW Department of Education manages asbestos in their facilities. The NSW Department of Education aims to eliminate exposure to asbestos through the identification and removal of asbestos where safe to do so. Where elimination is not possible, exposure is to be minimised so far as is reasonably practicable.

1.2 Purpose and Scope

The purpose of this AMP is to:

- meet the requirements of clause 429 of the WHS Regulation; and
- set out how asbestos or ACM will be managed, for example what, when and how it is going to be done.

This AMP is intended to be read by NSW Department of Education employees, their health and safety representatives, and other people involved in the management of asbestos at NSW Department of Education facilities. The AMP relates to general activities at NSW Department of Education facilities. Further management plans or other documentation may be required in specific instances, such as when a Principal Contractor undertakes asbestos-related works.

This AMP is to be treated as an overarching AMP for the NSW Department of Education. Each workplace (e.g. schools or corporate offices) where asbestos or ACM has been identified, assumed present, or is likely to be present from time to time has a School Asbestos Management Plan (SAMP).

1.3 Legislation

This plan has been developed to meet NSW Department of Education's requirements under clause 429 of the WHS Regulation to ensure a written AMP is prepared for facilities if asbestos or ACM has been identified, assumed present, or is likely to be present from time to time.

The management of asbestos within NSW Department of Education facilities, including identification, removal, encapsulation, transport, disposal, or potential disturbance of ACM, must be carried out in accordance with current versions of all relevant State and Commonwealth legislation, regulations and SafeWork NSW Codes of Practice:

- *WHS Act*;
- *WHS Regulation*;
- *Contaminated Land Management Act 1997* (NSW);
- *Protection of the Environment Operations (POEO) Waste Regulation 2014* (NSW);
- Code of Practice: How to manage and control asbestos in the workplace (NSW, 2019); and
- Code of Practice: How to safely remove asbestos (NSW, 2019).

1.4 Information on Asbestos

Asbestos is the term given to a group of naturally occurring mineral silicates which are prevalent in the earth's crust and are composed of fibres that do not readily break down within the human body. Asbestos was often mixed with other materials such as cement, bitumen and vinyl to enhance their properties. ACM was used extensively in the Australian building industry between the 1940s and the late 1980s due to their durability and fire resistance. The importation and installation of all forms of asbestos has been banned nationally since 31 December 2003. This ban does not apply to asbestos installed prior to this date (e.g. in-situ asbestos materials in buildings).

Inhaling asbestos fibres may lead to asbestos related diseases such as asbestosis, lung cancer or mesothelioma. The risk of developing an asbestos-related disease depends on a number of factors, including but not limited to how many fibres have been breathed in and for how long, and the type of asbestos.

2 Roles and Responsibilities

Under the WHS Regulation, NSW Department of Education, as a PCBU, must eliminate risks relating to asbestos, or if that is not reasonably practicable, minimise the risks so far as is reasonably practicable.

All employees, students, contractors, volunteers and visitors have a responsibility to comply with reasonable instruction relating to health and safety, including following the directions of this AMP for any asbestos-related matters.

Responsibilities on NSW Department of Education employees for managing asbestos are set out in the following procedures:

- Asbestos Management Procedure;
- Asbestos Incident Management Procedure; and
- Asbestos In or On Grounds Guide.

The procedures identify responsibilities for the following parties:

- all employees;
- persons responsible for works;
- School Infrastructure;
- school principal and workplace manager;
- school staff;
- Health, Safety and Staff Wellbeing Directorate
- School Infrastructure Communication and Engagement; and
- facilities maintenance contractors and other contractors/service providers.

The procedures seek to ensure that appropriate regard is given to:

- asbestos risk while a facility is being used for its usual purpose;
- maintaining assets that contain asbestos;
- asbestos risk throughout a project lifecycle; and
- removal of asbestos.

The procedures can be accessed on the School Infrastructure website.

3 Consultation and Communication

The WHS Act requires the NSW Department of Education to consult, so far as is reasonably practicable, with workers who carry out work or who are (or are likely to be) directly affected by a work health and safety matter. Consultation on health and safety risks arising from work involving asbestos or ACM needs to comply with the NSW Department of Education's WHS Consultation arrangements. Open and constructive consultation, communication, and cooperation between duty holders, principals and other workplace managers, workers and other stakeholders is essential to the work health and safety risk management process and must occur at every stage.

Refer to the WHS Consultation Procedure for further detail.

4 Asbestos Education & Training

NSW Department of Education has initiated various training measures to ensure persons under the management and control of facilities are aware of the risks involved with respect to asbestos or ACM in the workplace. These measures include:

- asbestos awareness training for asset management staff that covers identification, safe handling and suitable control measures for asbestos and ACM; and
- a mandatory asbestos management and control training course to help understand the process for controlling and managing asbestos in the workplace for principals, Public Schools senior executives, asset service officers and work health and safety advisors.

5 Asbestos Risk Management

5.1 Asbestos in Facilities

5.1.1 Asbestos in Buildings

Buildings constructed prior to 31 December 2003 may contain asbestos. Examples of some typical asbestos or ACM found in buildings include, but are not limited to, those presented in Appendix A.

5.1.2 Asbestos in or on Grounds

Sites may be contaminated with asbestos as a result of previous demolition activities or from illegal dumping. Examples of some typical asbestos or ACM found in or on grounds include, but are not limited to, those presented in Appendix A.

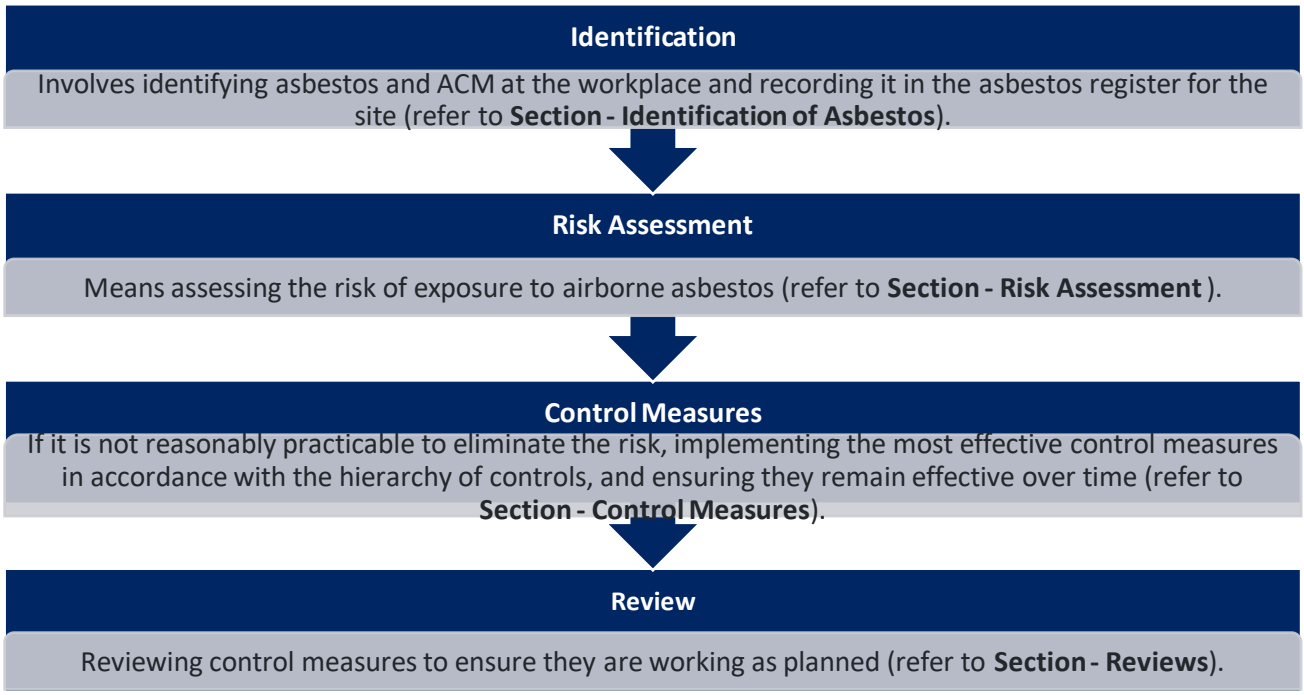
5.2 General Principles

The management of in-situ asbestos is important to ensure asbestos or ACM are not damaged or deteriorated to such an extent that NSW Department of Education facility employees, students, contractors, or visitors are unnecessarily exposed to airborne asbestos fibres.

The risk management process attempts to identify asbestos exposure hazards by identifying whether asbestos or ACM is present. When asbestos or ACM is identified, a risk assessment will be conducted with the intention to assess the level of risk and enable decisions to be made about appropriate risk control measures.

NSW Department of Education's principles of asbestos management have been fully adopted from guidance provided by the SafeWork NSW Code of Practice How to Manage and Control Asbestos in the Workplace and utilises the following systematic process:

Figure 1 - Risk Management Process



Refer to the WHS Risk Management Policy for further detail.

6 Identification of Asbestos

Identifying asbestos or ACM is the first step in managing the risk of exposure to asbestos.

The NSW Department of Education ensures, so far as is reasonably practicable, that all asbestos or ACM at NSW Department of Education facilities is identified by a competent person / licensed asbestos assessor. This includes but is not limited to conducting a thorough inspection of all areas of the facility including buildings, structures, ceiling spaces, storage areas, and facility grounds. These inspections may be conducted during school hours, provided they are not disrupting school activities.

Material that cannot be identified, but a competent person / licensed asbestos assessor reasonably believes is asbestos, must be assumed to be ACM unless sample analysis indicates otherwise.

If there is uncertainty as to whether asbestos is present in any part of a NSW Department of Education facility, it can either be assumed to contain asbestos and treated with appropriate caution based on the level of risk, or have a sample analysed.

Once the presence and location of asbestos has been assumed all requirements for managing asbestos must be followed until the material is removed, appropriately contained, or testing has confirmed that it does not contain asbestos.

If there are inaccessible areas in a NSW Department of Education facility, that a competent person / licensed asbestos assessor has identified as likely to have asbestos or ACM, it must be assumed that it contains asbestos until the area is accessed, and the competent person determines whether asbestos is present or not. Some materials cannot be visually assessed or sampled without damaging the item. If this is the case, the competent person will include the item on the asbestos register if asbestos is suspected.

6.1.1 Asbestos Registers

When asbestos or ACM has been identified, its location is noted in the NSW Department of Education's asbestos registers.

The asbestos register found in the school's SAMP lists all identified (or assumed) asbestos in a workplace and is intended to ensure workers and others in the workplace do not accidently disturb the asbestos.

NSW Department of Education ensures that asbestos registers are prepared for facilities under their control unless:

- the facility is a building constructed after 31 December 2003; and
- no asbestos has been identified at the facility; and
- no asbestos is likely to be present at the facility from time to time.

A typical asbestos register is developed to manage the risk of asbestos during the normal use of NSW Department of Education facilities.

The asbestos register records the location, type and condition of the asbestos at the facility.

6.1.2 Online Asbestos Review Tool (OART)

OART is managed by the department's School Infrastructure division and is hosted in the Asset Management System. It is an online database and reporting tool used by the competent person / licensed asbestos assessor selected from the Hygienist Services Panel (SINSW01340-20) to produce asbestos registers for NSW Department of Education facilities.

OART assists with the overall management, amalgamation, and digitised access of asbestos information within NSW Department of Education facilities.

6.2 School Asbestos Management Plan (SAMP)

Asbestos or ACM that has been identified at a NSW Department of Education facility is detailed in a school SAMP.

The SAMP details the approach to be taken by NSW Department of Education in managing asbestos or ACM by documenting procedures designed to minimise the risk of exposure to asbestos of all personnel on the site and must be read in conjunction with this AMP.

6.3 Signage, notices and Labelling

The requirements meet the responsibilities outlined in the SafeWork NSW Code of Practice: How to manage and control asbestos in the workplace.

6.3.1 Warning signage

All warning signs are compliant with AS 1319-1994: *Safety signs for the occupational environment.*

Any workplace that contains asbestos should be signposted with warning signs to ensure the asbestos is not unknowingly disturbed without the correct precautions being taken.

These signs should be:

- weatherproof;
- constructed of lightweight material; and
- adequately secured.

Signs should be placed at all the main entrances to the work areas where asbestos is present. The presence and location of the asbestos should be entered on site plans and the asbestos register and be accessible to all workers to ensure they are aware of the presence of asbestos.

6.3.2 Labelling

Labelling is the practice of using stickers or other notices to identify the location of asbestos or ACM in a workplace. The NSW Department of Education has determined that the labelling of all facility ACMs is not reasonably practicable because of the following:

- risks related to labelling of asbestos or ACM in schools need to be considered within the existing system of work for managing asbestos;
- the asbestos register can still be regarded as the primary data source for the locations of asbestos or ACM, as labelling is based off the materials identified in these asbestos registers;
- a range of user groups may be exposed to disturbed asbestos or ACM, however the likelihood of exposure varies significantly between these groups;
- risks related to potential asbestos or ACM exposure vary by factors including its accessibility. Higher risk ACM is typically not present in public areas of schools;
- maintenance workers such as General Assistants present the greatest exposure risk from asbestos or ACM. Labelling of asbestos or ACM may provide some reduction in risk for this group, however similar risk reduction may be achieved by existing controls;
- risks to contractors are managed with contractor management systems and the asbestos work authorisation process;
- risks for teachers and students are anticipated to be relatively low and the type of anticipated disturbance incidents may not be minimised by labels;
- risks for other school facility users are anticipated to be very low and the type of anticipated disturbance incidents may not be minimised by labels;
- labelling of asbestos or ACM could reduce the effectiveness of other more reliable measures for identifying asbestos or ACM in the existing system of work;

- risk of malicious damage deliberately targeting labelled asbestos or ACM is of low likelihood but an otherwise credible potential threat;
- labelling is intended to inform those who need to identify the location of asbestos or ACM. Labels convey this information to everyone, regardless of need, but do not include critical information to understand the risk posed;
- systems of work should attempt to prevent disturbance of all property hazards. With a single-hazard focus, labelling of asbestos or ACM is not conducive to such a system of work;
- with appropriate alternative risk controls in place, labelling of individual ACM is not expected to produce tangible reduction in the likelihood of exposure to asbestos.
- it is not anticipated that labelling of asbestos or ACM would positively impact the degree of harm from asbestos exposure;
- knowledge of risks and control measures for asbestos or ACM has remained largely unchanged for some time, but secondary risks may be considered when evaluating labelling of asbestos or ACM as a control measure; and
- most similar PCBUs within the industry utilise site or building signage rather than labelling of individual asbestos or ACM.

6.3.3 Asbestos Work Authorisation System

NSW Department of Education has implemented an 'Asbestos Work Authorisation' (AWA) system that enables a systematic controlled approach to providing approval to complete asbestos works. The AWA system also enables the systematic coordination of access controls to areas identified as restricted due to the presence of asbestos or ACM.

6.4 Accessing an Asbestos Register and a School Asbestos Management Plan

To ensure they are readily accessible to workers and their health and safety representatives, as well as Persons Conducting a Business or Undertaking who carry out, or intend to carry out, work at NSW Department of Education facilities, asbestos registers within the school SAMP are available online via the link below:

.https://www.schoolinfrastructure.nsw.gov.au/what-we-do/we-look-after-our-schools/schools-asbestos-register.html

6.5 Reviewing and Revising an Asbestos Register & School Asbestos Management Plan

To ensure the information is maintained and up to date, the asbestos registers and SAMP are reviewed and updated every 5 years or whenever:

- further asbestos or ACM is identified at a facility;
- the AMP is no longer adequate for managing asbestos or ACM at a facility;
- there is a review of the asbestos register or a control measure;
- a health and safety representative requests a review;
- asbestos or ACM is removed from or disturbed, sealed or enclosed at a facility; or
- refurbishment or demolition work is to be undertaken.

When reviewing the register, a competent person / licensed asbestos assessor should carry out a visual inspection of the listed ACM to determine its condition and revise the asbestos register as appropriate.

7 Risk Assessment

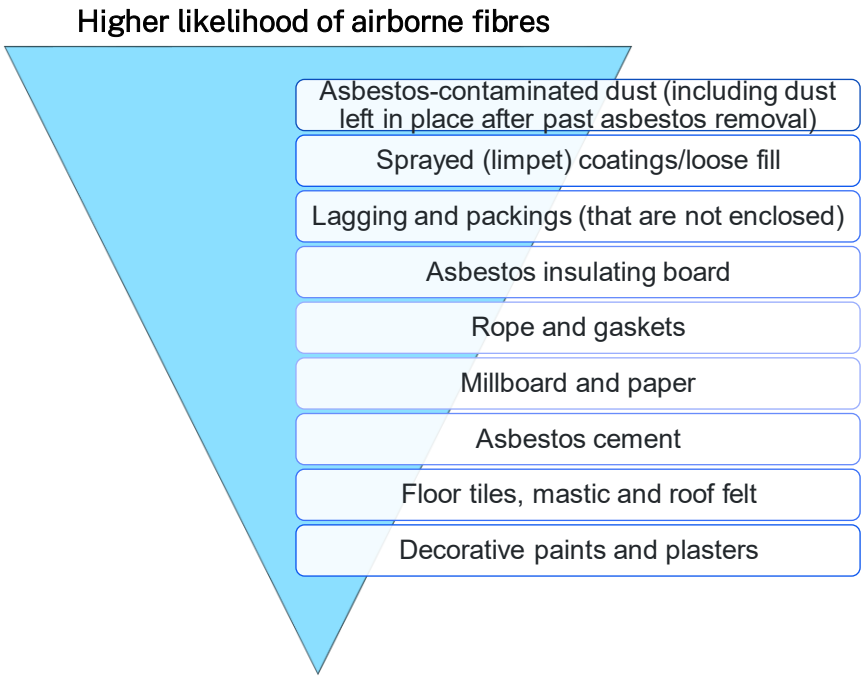
7.1 Assessing the Risk of Exposure

If asbestos or ACM is in good condition and left undisturbed, it is unlikely that airborne asbestos will be released into the air and the risk to health is extremely low. It is usually safer to leave it and review its condition over time. However, if the asbestos or ACM has deteriorated, has been disturbed, or if asbestos-contaminated dust is present, the likelihood that airborne asbestos will be released into the air is increased.

The type of material that binds asbestos fibres will influence the potential for airborne asbestos to be released into the air from different ACM. For example, friable materials such as a loosely bound sprayed (or limpet) coating is more likely to release fibres when disturbed than non-friable asbestos cement in which fibres are firmly bound. Friable asbestos is defined as any material that contains asbestos and is in a powder form or can be crumbled, pulverised, or reduced to powder by hand pressure when dry. Non-friable asbestos is defined as material containing asbestos that is not friable asbestos, including material containing asbestos fibres reinforced with a bonding compound.

Figure 2 shows the likelihood of release of airborne asbestos for different ACM.

Figure 2 – Airborne Fibre Release Scale

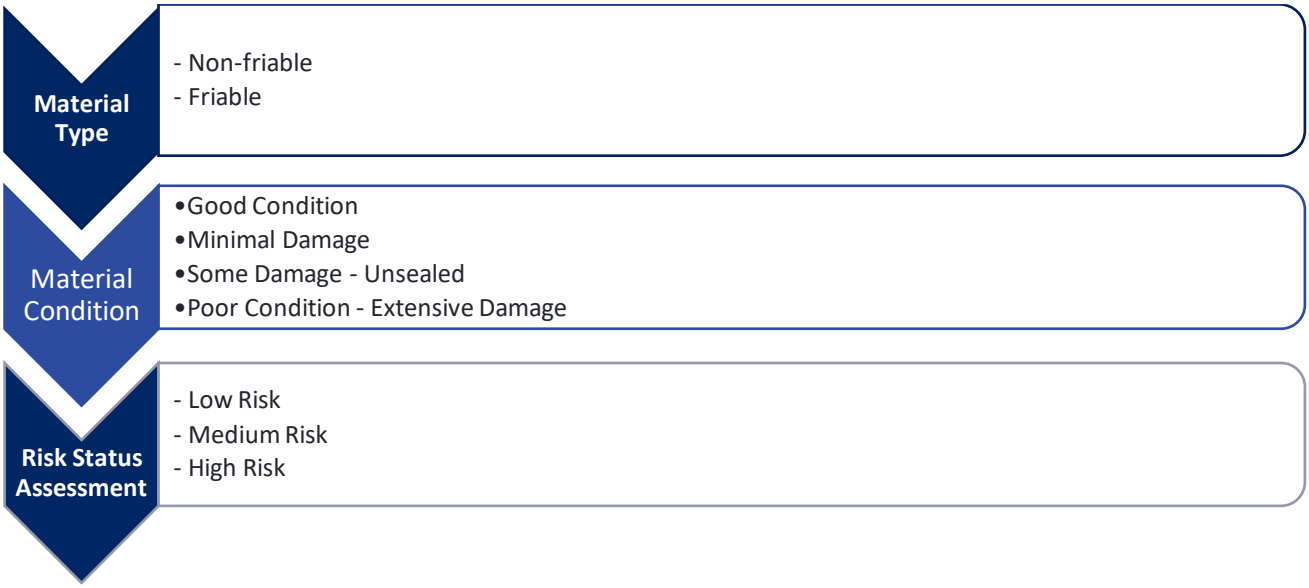


When deciding if there is a risk to health from asbestos, consideration should be given to whether the ACM is:

- in poor condition;
- likely to be further damaged or to deteriorate;
- likely to be disturbed due to work practices carried out in the workplace (for example routine and maintenance activities and their frequency); or
- in an area where people are exposed to the material.

A summary of the NSW Department of Education risk assessment process is presented in Figure 3.

Figure 3: Risk Assessment Process



To ensure uniform application of the risk assessment process, additional information is provided in the following sections.

7.2 Material Condition Assessment

The Online Asbestos Review Tool records the material condition of identified ACM in accordance with the assessment criteria presented in Table 7.2.

Table 7.2: Material Condition Assessment

Material Condition	Assessment Criteria
Good Condition	Non-friable sealed and no visible damage.
Minimal Damage	Non-friable sealed and minimal visible damage (e.g. hairline cracks).
Some Damage - Unsealed	Non-friable asbestos with significant breakage or several small areas where material has been damaged, revealing loose asbestos fibres. Non-friable asbestos that is unsealed.
Poor Condition - Extensive Damage	Non-friable asbestos that has extensive damage. Visible asbestos debris.

7.3 Risk Status Assessment

The competent person/ licensed asbestos assessor undertaking the on-site assessment allocates a risk rating in the Online Asbestos Review Tool, taking into account the condition, location, surface treatment and potential friability.

The allocation of the risk rating is based on many factors but is ultimately subjective and relies on the professional experience and competency of the assessor. The NSW Department of Education requires these to be well defined so there is a uniform application of criteria, and this is applied consistently across the portfolio by assessors in accordance with the risk status assessment ratings are presented in Table 7.3.

Table 7.3: Risk Assessment Status

Risk Status	Assessment Criteria
Low	**Low potential for fibre release. No remedial action, remove during refurbishment or maintenance, reinspect periodically.** As a guide, the material conforms to one, or more, of the following: • sealed, bonded ACM; • firmly bonded to substrate; • asbestos debris or stored material in rarely accessed areas; • further disturbance or damage unlikely other than during maintenance or service; • readily visible for further assessment; or • stable and damage unlikely, due to isolation or location.
Medium	**Elevated potential for fibre release. Enclose, encapsulate or seal, reinspect periodically.** As a guide, the material conforms to one, or more, of the following: • damaged material in accessible area; • friable material or poorly bonded substrate, with bonding achievable using appropriate surface treatment; • possibility of disturbance through abrasive contact; or • possibility of deterioration caused by weathering.
High	**High potential for fibre release. Restrict access and remove.** As a guide, the material conforms to one, or more, of the following: • friable or poorly bonded to substrate (that can readily release fibres), located in an accessible area; • asbestos subjected to recurrent abrasion or disturbance; • severely water damaged or deterioration likely; • friable asbestos material located in air-conditioning ducting; or • asbestos debris and stored asbestos in reasonably accessible areas.

8 Control Measures

8.1 Hierarchy of Controls

The NSW Department of Education controls the risks arising from asbestos-related work in a way that is consistent with the hierarchy of controls which ranks control measures from the highest level of protection and reliability to the lowest.

A combination of these controls may be required in order to adequately manage, and control risks associated with asbestos and ACM.

The Asbestos Management Procedure lists out the specific control measures which the NSW Department of Education implements in line with the hierarchy of controls.

The most suitable control measure should be selected in consultation with the competent person / licensed asbestos assessor.

8.1.1 Elimination

Elimination of the hazard and associated risk, for example by removing the asbestos, must always be considered first. While the ultimate goal is to have workplaces free of asbestos, it may not be reasonably practical or necessary to remove asbestos.

Other ways to eliminate the risk include not conducting work that has the potential to disturb asbestos or making decisions as to whether the work can be performed without disturbing the asbestos through alternative options such as re-routing services to avoid penetrating ACM.

8.1.2 Substitution

Where products containing asbestos are removed, they must be replaced with products that do not contain asbestos.

8.1.3 Isolation

If it is not reasonably practical to eliminate the risk, the risk must be minimised as far as reasonably practicable by using isolation controls which provide physical separation of workers from the asbestos hazard through a combination of barriers, distance, and enclosures. Examples may include restricting access to disused areas that contain ACM, covering or sealing a deteriorating asbestos-containing material with another material or paint, or using barriers and fencing to prevent access into an asbestos removal area by unprotected personnel.

8.1.4 Engineering Controls

Engineering controls relevant to asbestos comprise the tools and equipment used to carry out asbestos-related work. Information about how to safely carry out asbestos-related work, and which tools/equipment are prohibited for asbestos-related work, can be found in the Asbestos Management Procedure. Note that staff are not permitted to perform asbestos-related work.

8.1.5 Administrative Controls

If the risk remains, administrative controls can be implemented. Administrative controls include safe work methods and procedures that are designed to minimise exposure to asbestos as well as information, training and instruction needed to ensure workers can perform their roles safely. Examples include the development of safe systems of work, maintaining and communicating the presence and location of ACM through NSW Department of Education's asbestos registers, and reporting.

8.1.6 Personal Protective Equipment

If a risk to health remains after the higher order control measures have been implemented, personal protective equipment must be used to supplement higher order controls.

Personal protective equipment can be effective in controlling the risk from airborne asbestos fibres if appropriate equipment is selected and maintained, and employees are trained and supervised, and comply with the system. NSW Department of Education employees do not perform asbestos-related work, therefore personal protective equipment is not generally required.

8.2 Asbestos Management

8.2.1 Removal

Asbestos removal should be performed in accordance with the SafeWork NSW Code of Practice How to Safely Remove Asbestos. To ensure removals are compliant to the Code of Practice, specific guidelines for asbestos removals are provided in the Department of Education Asbestos Management Procedure.

All asbestos removal work carried out on NSW Department of Education facilities must be carried out by a licensed asbestos removalist. The validity of a relevant license can be found here: https://verify.licence.nsw.gov.au/. The licensed asbestos removalist must prepare an ARCP for any licensed asbestos removal work. The licensed asbestos removalist must notify the regulator in writing at least five days before the licensed asbestos removal work commences. The type of licence required will depend on the type of ACM being removed and is detailed in Table 8.2.

Table 8.2: Licence requirements for asbestos removal work

Type of license	What asbestos can be removed
Class A	Can remove any amount or quantity of asbestos, ACM or ACD.
Class B	Can remove any amount of non-friable ACM including any amount of ACD associated with the removal of non-friable ACM.

So far as is reasonably practicable, asbestos removal should be performed after school hours (including when there is no occupancy of after-school care) to minimise the number of people in the area. Approval must be obtained from the relevant Executive Director for asbestos removal

to be performed during school hours. Employees may be on NSW Department of Education - owned facilities while an asbestos removal is occurring elsewhere, providing that the asbestos work area is suitably restricted. The Project Manager must give due consideration to the means of communicating to all relevant employees that an asbestos removal is occurring.

The asbestos work area should be isolated, and access restricted to only those people carrying out the asbestos removal work. Barriers and warning signs should be used to separate the area from the rest of the workplace and ensure that other workers do not enter the area. Where an enclosure is used for friable asbestos removal work, a licensed asbestos assessor must visually inspect and conduct smoke testing of the enclosure to ensure there are no leaks or deficiencies before the asbestos removal work commences. The effectiveness of the enclosure should be regularly monitored while the asbestos removal work is underway.

Once asbestos removal work has been completed at NSW Department of Education facilities, a clearance inspection must be carried out and a clearance certificate issued before the work area can be re-occupied. Clearance inspections must be carried out and clearance certificates issued by an independent:

- Licensed asbestos assessor, for work that must be carried out by a Class A licensed asbestos removalist (e.g. friable asbestos removal), or
- Competent person, for work that is not required to be carried out by a Class A licensed asbestos removalist (e.g. non-friable asbestos).

Unauthorised people cannot enter the asbestos removal work area, and any protective barricades should remain in place until the final clearance certificate is issued.

All asbestos removed must be transported and disposed of as asbestos waste according to the WHS Regulation, the NSW Environment Protection Authority Waste Classification Guidelines, and the requirements of the local licensed waste disposal facility. Asbestos waste can only be disposed of at a site licensed by the NSW Environment Protection Authority, and it must never be disposed of in the general waste stream.

8.2.2 Enclosure

Where it is not reasonably practicable to remove asbestos, the preferred alternative control measure is enclosure.

Enclosure is the creation of a physical barrier around the asbestos that prevents access to the asbestos and minimises the potential for exposure to airborne asbestos fibres. This is an interim control measure and should be supported through regular inspections by a competent person / licensed asbestos assessor to identify if the asbestos requires removal due to damage or deterioration.

8.2.3 Encapsulation or Sealing

The next preferred control measure is encapsulation or sealing, which must be completed by contractors trained and experienced in working with asbestos under a safe system of work.

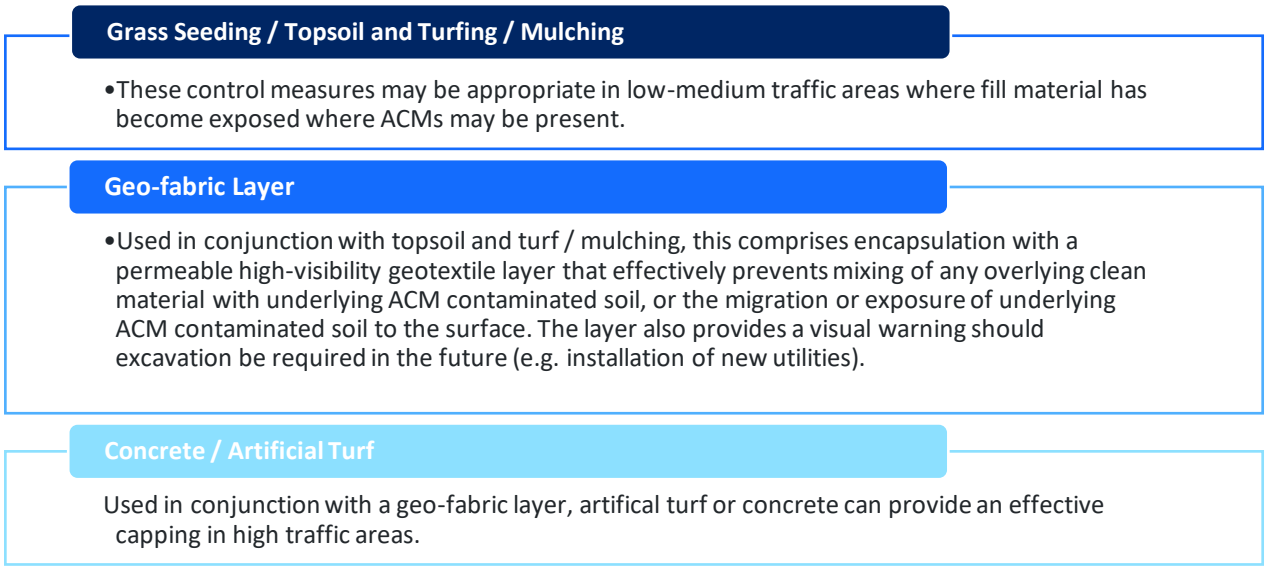
Encapsulation of asbestos can use a resilient matrix to seal any loose fibre into place. Encapsulation can help protect ACM from mechanical damage, increases the length of

serviceability of building products and may also be used to prevent the release of airborne asbestos during the removal process.

Sealing is the process of covering the surface of the material with a protective coating such as paint to protect it and prevent exposure to airborne asbestos. Sealing is inappropriate where the sealed material is likely to suffer mechanical damage. Where sealing has been selected as an appropriate control measure, a method should be used that does not disturb the asbestos.

Asbestos contaminated soil can be effectively managed by in-situ capping and containment creating a physical barrier between contaminated soils and sensitive receptors. The management and remediation of sites contaminated with asbestos is a specialised task and should be done in consultation with a Contaminated Land Consultant or Certified Contaminated Land Consultant who may be required to prepare a Remediation Action Plan and/or Environmental Management Plan detailing the requirements for proposed management. Examples of suitable in-situ capping of asbestos contaminated soil are presented in Figure 4.

Figure 4 – Encapsulation of Asbestos Contaminated Soil



Any material required to be imported to site as part of capping or backfilling must be Virgin Excavated Natural Material (VENM) in accordance with the NSW Department of Education's Educational Facilities Standards and Guidelines and NSW Environment Protection Authority requirements.

8.2.4 Leave in Situ

Asbestos in NSW Department of Education facilities that is stable and will not be disturbed during routine activities may remain in situ and be managed in accordance with the requirements of this AMP.

8.3 Asbestos In or On Grounds

8.3.1 Naturally Occurring Asbestos (NOA)

NOA is defined as the natural geological occurrence of asbestos found in association with geological deposits including rock, sediment or soil. The majority of asbestos that is encountered and poses a risk to health and safety will be found in manufactured products, however some areas may have to deal with asbestos in its natural state. It is estimated that less than 1% of the land surface of NSW has the potential to have naturally occurring asbestos within 10 metres of the surface. If naturally occurring asbestos is suspected or encountered in the course of construction work or other excavation activities, the unexpected finds procedure listed in Section 10 and further detailed in the NSW Department of Education's Asbestos Incident Management Procedure should be followed and a written AMP for the NOA must be prepared.

8.3.2 Importation of Materials

Imported material such as fill is a possible source of asbestos contamination. No individual or organisation is permitted to import or dump contaminated fill on to a NSW Department of Education-owned site. The importation of any type of fill as part of any works must have an appropriate validation certificate ensuring that the fill is certified as virgin excavated natural material (VENM) by the supplier in accordance with the NSW Department of Education's Educational Facilities Standards and Guidelines and NSW Environment Protection Authority requirements.

9 Managing Work on Facilities

9.1 Safe Work Procedures

The following represents a non-exhaustive list of considerations for workers arranging works.

9.1.1 Planning Works

The NSW Department of Education's Asbestos Management Procedure requires anyone planning works to consider the presence of asbestos and potential for disturbance during project and maintenance planning.

The NSW Department of Education has embedded criteria into its project planning documents to ensure that due consideration is given to whether asbestos removal or safe design (disturbance avoidance) is reasonably practicable.

9.1.2 Procuring Works

The NSW Department of Education's Asbestos Management Procedure requires service providers to be given key asbestos management related documents (including the SAMP which contains the asbestos register) before they price work to ensure that service providers have information about asbestos risks associated with the work. This enables service providers to:

- consider the tools and work methods to be applied for the work;
- consider the legislative prohibitions or restrictions on the use of certain plant on ACM; and
- prepare any necessary safe work method statements for the works and ensure their workers are trained in the safe work method statements before commencing the works.

Service providers with relevant training, expertise, experience and safety performance history should be preferenced during selection activities.

9.1.3 Pre-works

The person responsible for planning works must communicate, where relevant, any school community impact information associated with the works.

The person responsible must ensure any school community impact information is communicated to potentially affected parties including:

- NSW Department of Education employees;
- out of school hours providers;
- community organisations using the facilities; and
- Parents and Citizens' association members.

The person responsible must ensure that any revised information obtained through the pre-start work meeting is communicated to all potentially affected parties.

9.1.4 During Works

Departmental employees must not carry out works on assumed or confirmed ACM.

All employees must manage asbestos related incidents that occur during works in accordance with the Asbestos Incident Management Procedure including developing safe work method statements.

Air monitoring is to be performed during all asbestos removal works which require a Class A asbestos removal licence, where required for friable removals, or where otherwise required by the WHS Regulation. Control air monitoring is asbestos fibre air monitoring performed at the boundaries of the asbestos removal area to ensure that the control measures are effectively preventing asbestos fibre escape outside of the asbestos removal area.

The competent person performing the air monitoring must conform to the action limits outlined in the Code of Practice How to safely remove asbestos. Any air monitoring result greater than or equal to 0.01 fibres/mL must be reported to the Project Manager, who will then log this finding with the Incident Response & Support Hotline.

9.1.5 Post Works

Asbestos removal areas are not to be reoccupied until a Clearance Certificate has been received from a hygienist. The hygienist must update the asbestos register to indicate any asbestos that has been removed, as well as any areas in the Clearance Certificate where asbestos must be assumed to remain. The person responsible for the works should check that this process has been completed as part of project close-out.

9.2 Maintenance Work

It is important that work is performed safely to ensure that ACM are not disturbed during maintenance work.

Certain equipment can generate airborne asbestos fibres and must not be used on ACM. NSW Department of Education does not permit the use of the following equipment on ACM:

- high-pressure water spray; or
- compressed air.

Any equipment which may release airborne asbestos (such as power tools and abrasive hand tools) must not be used on ACM unless controls have been implemented in consultation with a competent person / licensed asbestos assessor. The following maintenance activities must not be conducted without approved safe work practices being implemented in consultation with a competent person / licensed asbestos assessor:

- drilling of ACM;
- sealing, painting, coating and cleaning of asbestos-cement products (***under no circumstances should asbestos cement products be water blasted or dry sanded in preparation for these activities***);
- cleaning leaf litter from gutters of asbestos cement roofs;
- replacing cabling in asbestos cement conduits or boxes;
- working on electrical mounting boards (switchboards) containing asbestos; or
- inspection of asbestos friction materials.

As a priority, the practicality of removing the ACM must be considered when planning for maintenance of ACM at the workplace, in accordance with the hierarchy of controls.

Works requiring disturbance to ACM must not be conducted without consultation with a competent person / licensed asbestos assessor and implementation of an approved safe work practice.

10 Incidents & Emergency Management

10.1 Unexpected Finds

An unexpected find is the identification of an asbestos hazard (or suspected asbestos hazard) which is not listed in the relevant asbestos register.

The following protocol must be followed in the first instance of an unexpected find event:

1. Stop work.
2. Isolate the area.
3. Inform the principal or workplace manager as soon as possible.

Further steps in the unexpected finds procedure are shown in Asbestos Incident Management Procedure and in Figure 5.

10.2 Incidents

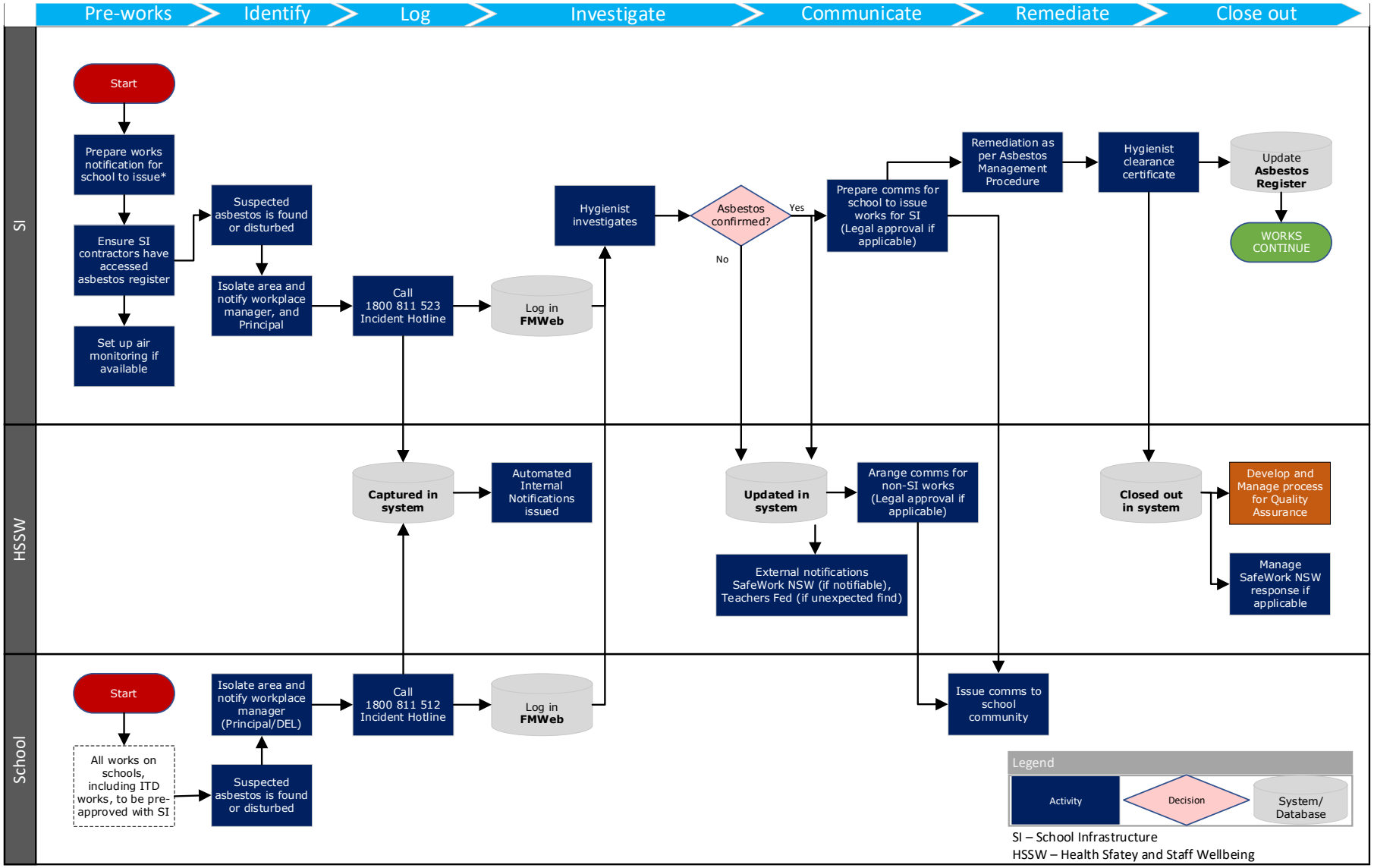
Where there are incidents of damage or disturbance to potential or known asbestos-containing material, the incident response procedure detailed in Figure 5 should be implemented as soon as practicable to reduce the risk of exposure to workers in the vicinity of the area.

Further steps in the incidents procedure are shown in Asbestos Incident Management Procedure.

10.3 Incident Notification

Asbestos incidents and near misses must be reported as soon as reasonably practicable within a 24- hour period either to the principal, other workplace manager or supervisor and/or directly to the Incident Report and Support Hotline on 1800 811 523 in accordance with the Incident Notification and Response Policy Procedures. Further details regarding notifiable incidents are contained in the Asbestos Incident Management Procedure.

Figure 5 – Asbestos Incident Management Process



* If works have material impact to school/community and/or WHS concern
** E.g. if works arranged by the GA, ITD or if asbestos is identified by school staff

10.4 Emergencies

An emergency can occur if a building, structure, or plant is structurally unsound or the collapse of a building, structure or plant is imminent.

If an emergency occurs and requires demolition, a procedure must be developed in consultation with a competent person / licensed asbestos assessor that will, as far as reasonably practicable, reduce the exposure to asbestos of workers and persons in the vicinity of the demolition site to a level below the exposure standard before the demolition work starts. The regulator must also be provided with written notice of the emergency immediately after they become aware of the emergency and before the demolition starts.

Further steps in the emergency procedure are shown in Asbestos Incident Management Procedure.

10.5 Vandalism & Illegal Dumping

Unexpected finds or accidental disturbances could occur from vandalism (for example, damage to ACM) or illegal dumping. In addition to the process outlined above, instances of vandalism and illegal dumping should be reported to the following:

- The local police station.
- The School Security Unit on 1300 880 021.
- The NSW Environment Protection Authority on 131 555 (for illegal dumping).

11 Review

This AMP must be reviewed, and if necessary revised, at least once every five years or when:

- the plan is no longer adequate for managing ACM at NSW Department of Education facilities; or
- a health and safety representative requests a review on reasonable grounds.

Note that different review requirements exist for SAMPs.

11.1 Record Keeping

To support the management of asbestos and ACM on its facilities, NSW Department of Education must maintain information on the following:

- copies of all asbestos registers, including reviews and revisions;
- evidence of documents relating to the provision of information to workers on the presence and location of asbestos and any associated safe work procedures such as any hazmat pre-start forms, or site inductions records that form part of a safe system of work;
- records of all training provided to workers while they are carrying out the work and for five years after the day the worker stops carrying out the work;
- records of any health monitoring that has been commissioned for at least 40 years after the report is made; and
- records relating to asbestos-related works including removal, for instance evidence of asbestos removal licenses and associated notifications to the regulator, results of air monitoring, and clearance certificates.

Appendices

Appendix A: Asbestos in Facilities

The following represents examples of ACM commonly found in Australian workplaces. Note that this is a non-exhaustive list of ACM and that ACM may appear different in different contexts due to material type, age and condition.

Asbestos in Buildings

Flat Asbestos Cement (AC) Sheeting, typically used for internal and external lining of walls, eaves and ceilings.

Compressed Asbestos Cement (AC) Sheet, a reinforced cement board that can be used as step treads.

Compressed Asbestos Cement (AC) Sheet, commonly used for toilet cubicle partitions and as an underlying flooring material for walkways and classrooms with raised floors.

Old Electric Heaters, insulation materials in the heater may contain asbestos.

Vinyl Tiles, floor tiling typical in laboratories, kitchens, bathrooms, corridors.

Putty, commonly used as a sealant in windows or expansion gaps.

Mastic/glue, a heavy-duty adhesive commonly used to adhere vinyl floor sheeting or tiles to the substrate.

Asbestos-backing paper, can be used to line to underside of vinyl flooring.

Asbestos Cement (AC) Sheet packing can be fixed under the bottom plate to ensure the timber frame is fully supported under studs.

Resinous Insulation Boards, commonly used as electrical backing boards for electrical meters and circuits.

Asbestos Cement Flue, commonly used as a channel through which gases and smoke travel from a source of combustion (fireplace, fume cupboard, furnace, hot water system) to the outside environment.

Lagging/sprayed limpet, usually found within ceiling cavities, to timber beams and to service pipes. Was used as an insulating material.

Asbestos in or on Grounds

Asbestos Cement (AC) Fragments/Debris such as fibro are often present in or on the soil surface as a result of incomplete clean-up following the past-demolition of structures that contained asbestos and the widespread presence of asbestos-containing fill. The debris can also be found in recycled aggregate.

Asbestos Cement (AC) piping, asbestos cement water and sewer pipes.

Stumps of Asbestos Cement (AC) fences, remnants of old fencing left buried in the ground.

Dumped ACMs, illegally dumped ACM.

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