ASU Submission

Draft Asbestos - Cement Water and Sewer Pipelines Management Guidelines

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Date:	11th August, 2020

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Introduction

1. The Australian Services Union (ASU) is one of Australia's largest unions, representing approximately 135,000 members.

2. The ASU was created in 1993. It brought together three large unions – the Federated Clerks Union, the Municipal Officers Association and the Municipal Employees Union, as well as a number of smaller organisations representing social welfare workers, information technology workers and transport employees.

3. Currently ASU members work in a wide variety of industries and occupations because the Union's rules traditionally and primarily cover workers in the following industries and occupations:

    - Local Government;
    - Social and community services;
    - State Government, Statutory Authorities & State owned corporations;
    - Transport, including passenger air and rail transport, road, rail and air freight transport;
    - Clerical and administrative employees in commerce and industry generally;
    - Call centres
    - Electricity generation, transmission and distribution

4. The ASU has members in every State and Territory of Australia, as well as in most regional centres and represents workers throughout the water industry of specific relevance to this submission.

PART 1

Nationally consistent approach

5. In 2018, the Asbestos Safety and Eradication Agency (ASEA) released the report, *Case studies of asbestos water pipe management practices* in relation to rehabilitating water and sewer pipes containing asbestos in three States: Victoria, Queensland and Western Australia and identified best practice for safe and effective management and removal. The report recommended that a clear, nationally consistent approach to managing asbestos-cement water and sewer pipes across Australia.

6. The ASU supports a nationally consistent approach to managing asbestos-cement water and sewer pipes to ensure the health and safety of the public and workers employed in this sector many of whom are ASU members.

7. The Agency has released the draft *Asbestos-Cement (AC) Water and Sewer Pipe Management Guidelines* for public comment and has invited submissions from the public on the draft Guidelines. The ASU strongly supports practical guidance on how to eliminate or minimise the risks of asbestos exposure when managing water and sewer pipes in accordance with the work health and safety and environment protection laws that currently exist across Australia.

8. The ASU in these submissions aims to contribute to the final version to ensure it is useful and supports safe practices when managing and removing AC water pipes.

Water Pipes Working Group

9. ASEA convened the Water Pipes Working Group ('WPWG') so that governments, water authorities, industry and unions could work together to develop nationally consistent information on how to eliminate or minimise the risk of asbestos exposure when managing and removing asbestos-cement and sewer water pipes.

10. The WPWG was established as the primary consultative mechanism for developing a nationally consistent approach to managing asbestos-cement water and sewer pipes. The WPWG is comprised of representatives from environment authorities, work health and safety regulators, peak industry and unions. It was the WPWG that developed the draft Guidelines based on their collective experience and expertise. The Union representative on the WPWG is ASU delegate, Steven Newham, an experienced Process & Water Quality Specialist from Goulburn Valley Water. The ASU wishes to acknowledge Mr Newham's contribution to the WPWG and the following response to the Draft Guidelines in this submission.

Responding to the Consultant questions

11. In relation to Consultation **Question 5** - **Should guidance on temporary storage and disposal of asbestos waste be added?** The ASU's answer is: Yes.

12. Further in relation to Consultation **Question 6**. **Is there further practical guidance that should be included in the guidelines?** The ASU's answer is: Yes; such as Practical guidance on safe methods of managing AC during Sewer mains high pressure jetting.

PART 2 - Draft Asbestos-Cement Water and Sewer Pipe Management Guide

13. Specifically the ASU wishes to make the following comments:

14. **Paragraph 12 & 29 -** If asbestos is to be left in situ on private property; then regardless of any land titles requirements, the water agency should note either on periodic fee statements or at the least during sale of land or transfer of title that the asbestos waste exists, and to what extent it exists. There could be a plan showing location, depth, size etc.

15. The following is specific to **paragraph 12**, but should be considered a general management standard for **Asbestos registers, asbestos management plans and environment protection.** Periodic inspections of the abandoned asset should be completed at an appropriate timeframe e.g. every 2-5 years, to ascertain whether the asbestos waste is still

covered to a sufficient depth to prevent exposure; consider excavations or land erosion that may occur.

16. Paragraph **13 & Common management methods.** A clear distinction between best practice management methods for Water pipes and Sewer pipes should be made as Sewer pipes are often at great depth so lift and relay may not be the best method of management or even appropriate.

17. Pipe **removal and replacement (lift and relay) Paragraph 39-43.** This only refers to future exposure. However lift & relay exposes the most immediate amount of AC to workers and, subject to management practice, arguably the most amount of AC exposure long term due to the need to break sections into manageable lengths and manually wrap every single section prior to disposal.

18. **By-passing and construction of a new alignment Paragraph 44 – 46.** All forms of renewal may include connection to existing AC pipe that is to be retained in service. Paragraph 46 is not unique to this method and should not be listed as an individual risk for this method.

19. **Slip lining and curing-in-place pipe lining Paragraph 47 – 49.** Pipe renewal techniques all leave legacy risk of exposure to AC for workers long term from maintenance activities. Cut-ins (sewer or water) and Tappings are often undertaken by contractors or plumbers. This is a future risk, but arguably causes less exposure than removing entire water mains as the AC removed is a very small quantity and easily managed.

20. **Pipe bursting / pipe reaming Paragraph 50-57, Bypassing Paragraph 44 - 46 & Paragraph 12.**There is no fundamental difference in the nature of the AC fragments left in situ around a pipe burst to full sections left in situ. If the management practice of leaving a full length in the ground is acceptable for one, then it is acceptable for the others and its' prohibition is only on legal technicalities. Long term exposure to AC during maintenance activities, cut-ins or tappings, remains the same as cure in place methods

21. **Figure 1 & Paragraph 34 and General comments.** The comments in the document around lift and relay and By-passing being the best methods are based on a fundamentally flawed premise that small pieces of AC left in the ground are waste that must be removed, but large pieces left in the ground are safe if there is enough soil coverage and, that lift and relay eliminates the future risk. Paragraph 34 states that release of AC fibres during *maintenance* work must be eliminated or minimised so far as is reasonably practicable. The document appears to consider that the replacement of an AC main *is not* a maintenance activity. However, lift & relay is a maintenance activity that exposes workers to the most amount of AC handling.

Conclusion

22. The ASU submits for the health and safety of workers and the general public; the Draft Guidelines are about minimising the risk of exposure to AC with the least amount of handling.