



Submission Template

Encompassing:

Guide for local government to combat illegal dumping and improper disposal of asbestos (the draft Guide)

Submission from: Australian Institute of Health and Safety, College of Fellows Policy Committee

Contact details: Dr Peta Miller College of Fellows Policy Committee

Whilst you can structure your submission in any form that you choose, you may like to use the questions below to frame your thoughts and ideas. Please write as much as you like.

*The final question – **question 10** – is open ended and asks for any other feedback or experience you may like to share.*

Information about submissions:

Please send your submission (or any questions) to engage@asbestossafety.gov.au

Consultation closes on **Friday 30 September 2022**. We will acknowledge receipt of all submissions received.

Please note that your submission may be published on our website. If you would like your submission to be excluded from publishing, or to be published anonymously, please indicate this below:

- do not publish submission
- publish submission anonymously
- other, please advise



Guiding questions:

Challenges for local governments in combating illegal dumping and improper disposal of asbestos

1. The draft Guide identifies the key challenges involved in combating illegal dumping and improper disposal of asbestos.

Do you think the draft Guide adequately addresses those challenges? If not, which additional challenges should be included and addressed?

(box will expand as you type)

2. The intended target audience for the draft Guide are council staff who have responsibility for, or oversight of, the development and implementation of waste management strategies, including illegal dumping and the prevention of asbestos exposure, or staff who are involved in collecting data about or evaluating relevant initiatives.

Do you think the draft Guide provides enough practical guidance and advice for council staff to implement reduction strategies?

Yes



Principles to encourage action

3. The draft Guide provides principles to address the challenges of combating illegal dumping and improper disposal of asbestos.

Are the asbestos intervention principles easy to understand and incorporate into designing reduction strategies and interventions?

If not, how can these principles be enhanced or improved upon?

The principles are clear, practical and appropriate

The section on Understanding the Asbestos Waste Journey would benefit from some diagrams whilst I understand where the jargon comes from words, like 'pre-awareness' may not be user friendly.

Point four consider additional words... *Understanding your council's* asbestos waste journey...

Some great points clearly presented

Proactive and reactive approaches

4. The draft Guide has a consistent theme of encouraging preventative strategies to reduce illegal dumping and improper disposal of asbestos.

Do you agree with this approach?

We also support the way the document encourages the reader (council) to consider the whole system (referred to as the asbestos journey) impacts risks and opportunities for control.

I noted reference to builders and construction trades. It would also be useful to call out the need to ensure as part of the planning application process with councils designers/architects have discusses with their clients and the builders the costs and safe processes for waste management. This provides then an extra defence layer and is consistent with shared WHS duties ins supply chains.

5. ASEA has developed asbestos awareness resources and materials that are freely available to all councils. Does the draft Guide make it clear that these resources can be easily accessed, tailored and distributed?

Yes

Collaboration, knowledge sharing and stakeholder engagement

6. ASEA plans to have the draft Guide made freely available through its website and to update it to incorporate new learnings or innovations over time.

Do you have any suggestions on how ASEA could most effectively promote this Guide to its stakeholders, and encourage collaboration and knowledge sharing?



7. Would you like to see more case studies and best practice examples provided in the Guide?
If yes, are there any case studies or examples you could provide for this purpose?

Additional examples for communities with high numbers of ATSI would be beneficial. Examples are best sought from these groups directly

8. The draft Guide includes links to a number of organisations and resources.
Are there any links that you think are missing and would like ASEA to consider including?

Accessibility, format and design

9. What are your overall impressions of the Guide? Do you think the information is provided in a logical, flowing way? Do you have any concerns about the information included or the way that it has been included? Are there any aspects you would recommend for improvement or change?

The guide is clear and well set out.

Generally, consider how use of '*your council's*' through the document may increase a sense on connectedness for the reader

Other comments

10. Are there any other comments you would like to make on this Guide?

On page 6 text box, we suggest under *Your council does not provide waste services but contracts them out...* include a sentence noting that a council retains shared WHS responsibilities with the contractor to ensure relevant workers and others are not harmed.

Page 7 para 2, suggest the addition 'illegal dumping **prevention** strategy'