



Asbestos Management Plan

V 2.0

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1. PURPOSE

This document provides direction to all employees and subcontractors responsible for identifying, managing, removing and transporting asbestos, in the workplace.

When asbestos is identified or removed at workplaces, all reasonably practicable steps are to be taken to minimise the harm it may cause to employees, subcontractors and the public.

2. SCOPE

This plan applies to all locations Brydaw employees and subcontractors who will be engaged to undertake their contractual obligations. This plan does not describe work practices for 'friable asbestos disturbance and/or removal', however provides emergency processes where any type of asbestos is inadvertently encountered and/or disturbed.

3. OVERVIEW

When undertaking work, particularly in the Telecommunications industry, employees and subcontractors may encounter Asbestos Containing Materials (ACM). The process and systems set out in this document are minimum requirements as established under legislative requirements and contractual obligations for the management, control, removal and transportation of asbestos materials.

4. DEFINITIONS AND ACRONYMS

10 square metres (10m²) - refers to the permitted amount of non-friable (bonded) asbestos that a worker/company person can generally remove without holding as asbestos removal license. (Note: 10 square metre rule removed in the ACT)

Asbestos - asbestos form 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),
- tremolite asbestos,
- a mixture that contains 1 or more of the minerals referred to above

Asbestos containing material - any material or thing that, as part of its design, which contains asbestos. (ACM) - When working on Telecommunications network infrastructure network it **must** be presumed that all Telstra non-plastic pits and conduit contain ACM.

Asbestos Disposal Register (ADR) - a register used to manage and document, where Consolidated Bins or combined storage facilities are used, the receipt of asbestos materials (i.e. bags) received from various projects.

Asbestos management plan - a written plan identifying the asbestos and how it is to be managed



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Asbestos register - a written register recording the asbestos containing materials (ACM) within a workplace

Asbestos-related work - work involving asbestos other than asbestos removal that is permitted i.e. rodding through an asbestos conduit, accessing a port in an asbestos pit, drilling into asbestos eaves

Asbestos removal licence - Class A asbestos removal licence or a Class B asbestos removal licence.

Asbestos removal work - Work involving the removal of asbestos or ACM, or Class A asbestos removal work or Class B asbestos removal work

Asbestos waste - asbestos or ACM removed and disposable items used during asbestos removal work including plastic sheeting and disposable tools.

Clearance certificate - is a certificate issued by a licensed asbestos assessor verifying that the asbestos work area is now safe to return to work.

Employee - means persons under contractual obligation to Brydaw including staff but excludes sub-contractors (as defined below)

EPA - Environmental Protection Authority

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.

HSE Advisor - Health, Safety and Environment Advisor

Incident - An unplanned event resulting in actual or potential injury, equipment damage, property damage, environmental damage, public liability exposure or business interruption.

Inert Soil/Fill/Waste - also known as Clean Fill, Clean Earth, Clean Earthen Material, Waste Fill or VENM. Inert soil is soil not contaminated with any material.

Naturally occurring asbestos - the natural geological occurrence of asbestos minerals found in (NOA) 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.

Photo - A picture taken which includes a Date, Time and Location Coordinates (GPS) displayed on the photo (and/or recorded with the data set of the photo)

Regulator - government body that ensures compliance with laws, regulations and established rules; SA = Safework SA.

RTO - Registered Training Organisation

State - refers to States and Territories within Australia

Subcontractor - means a contractor engaged by Brydaw to perform services under specific contracts

WHS - Work Health and Safety

Worker - A person who performs the work

5. Responsibilities

5.1 Managers/Director

Managers/Director have overall responsibility for asbestos management. They are to ensure that:

- Any works that may involve working near suspected ACM is advised to the Client and Brydaw Director immediately;
- Any modification or removal of ACM is notified to the Client and the required permissions are obtained;
- Regular inspections and monitoring are conducted for identified asbestos areas/equipment within their responsibility;
- Safe work procedures are developed and communicated for asbestos removal work within their area of responsibility;
- Appropriate asbestos hazard control methods are implemented for the removal of asbestos where appropriate training and personal protective equipment;
- Work that can involve asbestos hazards does not place Brydaw workers or the public at risk;
- The person declaring site clean has been appropriately trained to do so
- They have a good understanding of asbestos management procedures and clearly understand the process for asbestos management detailed in the SWMS
- Ensuring asbestos workers comply with all legislation and documented processes for managing the removal and transport of ACM material;
- Undertake site observations of workers performing ACM work
- Report any incidents immediately

5.2 Site Supervisors

Where asbestos removal or modification occurs, Brydaw requires that an asbestos supervisor be within 20 minutes of site. The site supervisor is responsible for control of the site and to manage works to defined standards. The site supervisor is responsible for but not limited to:

- Ensure workers have signed SWMS and JSEA
- Ensuring all PPE and equipment required is on site
- Monitor safe work practices and record observations
- Correct any unsafe behaviours or acts
- Nominated as site supervisor on JSEA
- Manage any incident response and report occurrences to management

5.3 HSE Manager/Advisor

Will be responsible for:

- Reviewing and monitoring the asbestos management plan and associated documents
- Assist with incident review
- Assist with inducting new workers
- Provide advice on the management of asbestos
- Monitoring staff training and accreditations

Note: Where HSE Advisor/Manager not in place, Company Director will assume responsibility for the above.

5.4 Workers

Workers involved in removal and/or transport of ACM are responsible for:

- Not placing themselves, other workers or the public at risk of injury
- Observing safe work procedures
- Complete asbestos training as defined in this document
- Wearing appropriate PPE when dealing with ACM
- Not removing ACM unless they appropriately licensed to do so
- Reporting ACM related incidents to their supervisor immediately
- Carrying a copy of relevant EPA exemptions/licensing where applicable
- Carrying and understanding asbestos related SWMS
- Cooperating with Brydaw and Client managers and HSE

6. The use of Asbestos

The use of all forms of asbestos is no longer permitted in Australia. The use of all types of asbestos including manufacture and use (including the reuse or sale) of any asbestos product is prohibited. When ACM (or suspected ACM) is identified in the workplace/work site, an appropriate risk assessment is to be completed, i.e. JSEA and or SWMS. Brydaw employees are to adopt safe work method practices for handling/removal/transport of the ACM if it is in their scope of work.

7. Training

Most removal work for non-friable ACM typically involves less than 10 square metres. Before working with any ACM or presumed ACM, a worker carrying out asbestos removal work on behalf of Brydaw, including a self-employed person conducting a business or undertaking, must be trained in the identification and safe handling of asbestos prior to carrying out asbestos removal work. An asbestos worker may need an asbestos non-friable removal unit of competency and to be licensed depending on Client requirements or quantity above 10 square metres.

General asbestos awareness training provides the absolute minimum requirements to identify and manage the asbestos hazards in network buildings, general office buildings, pit and conduits, residential and commercial customer premises, but this training may not provide sufficient training to remove any asbestos on behalf of Brydaw.

8. Asbestos removal and supervision

To undertake asbestos modification or removal, workers must be approved to do so by Brydaw Director. Undertaking a work practice assessment is the required task for approval. Non-licensable asbestos removal work cannot be performed without Brydaw approval and may not be performed for Clients such as Brydaw without additional training and licensing requirements.

This includes:

- CPCCDE3014A – Remove non-friable asbestos (general asbestos worker)
- CPCCBC4051A – Supervise asbestos removal (site supervisor who under Brydaw must be onsite during asbestos works at all times.
- Condition Class B non-friable asbestos removal license

8.1 Refresher training

Any refresher training required for asbestos accreditations will be attended in line with state based requirements.

8.2 Licenses

Asbestos removalists are to be appropriately licensed in accordance with the Workplace Health and Safety legislation. These specify that:

An “**A Class**” asbestos removal license, also known as Asbestos Removal Business Certificate, must be acquired for the removal of friable asbestos containing material but the license also covers the removal of bonded asbestos material of 10sqm or more.

A “**B Class**” asbestos removal license is acquired for work to remove 10sqm or more of bonded asbestos material. This licence **DOES NOT** permit its holder to remove friable asbestos.

The law permits an employer or self-employed person to conduct a limited amount of asbestos removal work without a licence if:

- The ACM is non-friable
- The area of ACM to be removed does not exceed 10 square metres in total

8.3 Health Surveillance and Medicals

Legislation requires that an Asbestos Health Surveillance examination is required:

- At time of employment in asbestos-related process
- Every 2 years whilst working in an asbestos-related process
- At termination of employment in an asbestos-related process
- Ongoing as determined by exposure history and as recommended by the over sighting Medical Adviser or Occupational Physician.



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Reports will be kept as a confidential record for at least 40 years after the record is made and identified as a formal record for the particular worker. The report and results must not be disclosed to anyone unless the worker has provided their written consent. However, if the person was releasing the record under a duty of professional confidentiality, the worker's written consent is not required.

8.4 Records

Records of license, training, and medical etc shall be archived by Brydaw management/admin to allow tracking of currency. Brydaw will capture this information on the staff training matrix.

9. Asbestos Removal/Modification

9.1 Friable asbestos

Under no circumstances can Brydaw workers undertake tasks that involve working near, around or with potentially friable asbestos. If a substance is unknown and may have potential to be friable asbestos, this must be reported immediately to Brydaw management. Work is not to commence and area should be barricaded off to prevent any person/s entering that zone.

9.2 Non-friable

More than 10 square metres

This is licensable work and requires a Class A or Class B license. The removalist or modifier also requires specific training. Brydaw does not perform non-friable asbestos removal above 10 square metres. If asbestos removal is calculated to be 10 square metres or above, report this to Brydaw management. Work is not to begin and it is likely that an external licensed contractor will need to be engaged. When approved to remove more than 10 square metres, Brydaw will engage an external company to perform air monitoring and provide that evidence to the Client.

9.3 Asbestos contaminated soil

Workers removing ACM and contaminated soil must dispose of the soils in accordance with relevant State / Territory legislative requirements that apply to the location where the waste was generated. Movements of waste materials across state or territory borders may also trigger requirements under the Australian Dangerous Goods Code.

Transporters will hold relevant licenses where applicable for transport and storage, and to dispose of ACM waste and/or contaminated soil at appropriate landfills which may lawfully receive asbestos waste or contaminated soil.

9.4 Moving dislodged ACM or removing non-embedded pieces of potential ACM

Where there are fragments or broken pieces that are already dislodged, these may be moved to perform your work by applying the following controls:

- Take photos with GPS, date and time of before and after

- Guard area
- Put on safety glasses, P2 face mask and disposable gloves
- Wet the area down with water via a spray bottle
- With PPE on, remove the ACM slowly and place into double lined asbestos bags.
- Wipe clean reusable equipment with wet wipes/rags
- Place wipes and disposable equipment in asbestos bag and then double bag in an asbestos bag and dispose of at an approved facility

9.5 Rod, Rope and Haul

Rodding and roping through ACM conduit (typically A100 in Telstra CAN) between two pits/manholes can occur, with adherence to the following:

- Guard area
- Put on safety glasses, P2 face mask and dedicated ACM riggers gloves
- Wet the removal area down with water via a spray bottle
- With PPE on, clean rods, ropes or cable that has been in ACM conduit as it is removed
- Dispose any removed rope that was previously left in the ACM conduit as ACM waste
- Wipe clean reusable equipment with wet wipes/rags
- Place wipes and disposable equipment in asbestos bag and then double bag in an asbestos bag and dispose of at an approved facility

9.6 PPE, Equipment and Documentation

PPE and equipment is to be made available and worn when conducting work activities that require the need to penetrate or remove ACM. Documentation must be available at each site where works occur in order to provide workers with the ability to check work practices.

Prohibited Tools and Equipment

Legislative provisions state that tools and equipment that generate dust must not be used on asbestos. These include:

- High-speed abrasive power and pneumatic tools, for example angle grinders, sanders, saws and high-speed drills
- Brooms and brushes (unless brushes are used for sealing with liquid substances)
- **High-pressure water spray**, jets, power or similar tools and instruments on asbestos in the workplace
- **Compressed air.**

Refer to Brydaw FRM-11 Asbestos Equipment Check List - for a full list of PPE, equipment and documentation required to perform non-friable asbestos work, which must be available at site.



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Issue Date: 01/02/2018

10. Document Control

All changes and updates to this document are to be recorded below.

Document Control/Approval		
Prepared by: Chris Hoffmann Role: Director Signature: Date: 1/02/18 Mobile:	Reviewed by: Pam Hoffmann Role: HSE Admin Signature: Date: 1/02/18 Mobile:	Approved by: Chris Hoffmann Role: Director Signature: Date: 1/02/18 Mobile:

DOCUMENT CONTROL				
Amendment	Date	Page/ Section	Description	Edited by
1.0	01/02/2018	All	First Release	Chris Hoffmann

ENVIRONMENTAL POLICY

Brydaw has a duty of care to all employees, subcontractors and visitors to provide a safe and healthy working environment.

Where the behaviour of an employee, subcontractor or visitor is influenced by alcohol and/or drug use and this behaviour is improper, unsafe or constitutes a risk to themselves or others, this behaviour must be addressed immediately by any manager or employee.

This Policy applies to all Brydaw locations, work related functions, (including off site functions) and any event where Brydaw is represented by invitation.

This policy may be overridden by other alcohol and/or drug policies that apply to individual activities and/or groups working on specific projects.

ROLES AND RESPONSIBILITIES

Management - are responsible for the implementation of this policy in their area of responsibility and have the authority to act immediately. Management will provide opportunities and information for support and assistance for employees with drug and alcohol related problems and other substances

Employees, subcontractors and visitors – will ensure they are fit for work and their work performance is not impaired by the misuse of alcohol and/or drugs (including over the counter medications). They must not endanger their own safety to the safety of others. Where alcohol is approved at company sponsored functions and one chooses to drink, they will behave in a professional manner within the bounds of Brydaw policies.

Construction sites and field works – employees and subcontractors must maintain a zero drug and alcohol reading during the course of works while at site and or operating any item of plant or heavy vehicle. They are require to participate in Brydaw and/or client drug and alcohol testing programmes.

Disciplinary action

A breach of this policy will result in Brydaw management conducting an investigation and applying its disciplinary policy and this may result in termination of employment.

Chris Hoffmann
Director