

Submission on the Draft Asbestos National Strategic Plan Phase Three 2024-30

October 2023

About WALGA

The Western Australian Local Government Association (WALGA) is the united voice of Local Government in Western Australia. The Association is an independent, membership-based organisation representing and supporting the work and interests of 139 Local Governments in Western Australia, comprising 1,215 Elected Members and approximately 22,600 Local Government employees, as well as over 2.5 million constituents of Local Governments in Western Australia.

Western Australian Local Governments vary greatly in:

- size, ranging from less than 1.5 to over 370,000 square kilometres,
- population, just over 100 to more than 224, 000 people,
- the number of staff employed, from less than 10 to over 1000,
- in revenue received, which in 2019-20 ranged from just over \$2 million to just over \$226 million.

Acknowledgement of Country

WALGA acknowledges the continuing connection of Aboriginal people to Country, culture and community. We embrace the vast Aboriginal cultural diversity throughout Western Australia, including Boorloo (Perth) on the land of the Whadjuk Noongar People where WALGA is located, and we acknowledge and pay respect to Elders past and present.

WALGA is committed to supporting the efforts of WA Local Governments to foster respectful partnerships and strengthen relationships with local Aboriginal communities.

Comment

The Association appreciates the opportunity to comment on the Asbestos Safety and Eradication Agency (ASEA)'s [Draft Asbestos National Strategic Plan Phase Three 2024-30](#) (Draft ANSP).

This Submission was endorsed by WALGA State Council on 12 October 2023.

WALGA generally supports the priorities and actions identified within the Draft ANSP, but recommends further clarification be provided on resourcing, responsibilities, performance measures and targets for the plan to be effectively implemented.

Local Governments' role in asbestos management

The management of asbestos and asbestos containing material is a small but significant part of Local Government activities. As identified through the Draft ANSP, significant barriers to correct and safe disposal of asbestos are evident in the community, including low awareness of asbestos occurrence and risk, difficulty in identifying ACMs and accessing qualified asbestos assessors and removalists.

Local Government is often the first point of contact for residents to provide advice relating to asbestos disposal. Local Governments actively promote correct disposal of

asbestos to residents and provide resources to assist residents in assessing asbestos risk.

Challenges faced by Local Government, and the communities they represent, in ACM management include:

- Health, environmental and financial impacts of managing asbestos illegally dumped in the natural environment.
- Health and financial impacts of managing asbestos illegally disposed of through Local Government services, such as kerbside bin systems, vergeside collections and a landfills.
- The significant costs associated with remediation of ACMs in public buildings and government owned housing.
- Managing ACMs during emergency response and recovery.
- Accessing in a timely manner, and the cost of accessing, suitably qualified contractors in regional and remote areas, for example to undertake air monitoring following a fire or to remove friable asbestos.
- Remediation of asbestos contaminated land.
- Community members whose properties are under, or not, insured.
- Ensuring health and safety of Local Government staff and the community where ACMs are present, particularly in regional and remote communities.

WALGA supports the range of actions proposed under the Draft ANSP, in particular:

- **The development of further guidance on management of ACMs during emergency response.**
- **Improvement and promotion of the National Residential Asbestos Heatmap.**
- **The development of incentives to encourage the safe removal of ACMs from residential and commercial properties.**
- **The identification of legacy asbestos in remote communities to inform better management.**

National Action Plan and measuring performance

The Draft ANSP identifies proposed actions, performance measures and targets to support the overall aims, through a National Action Plan aligned to the four priorities and six enablers.

The actions and performance targets are clear, however need to be supported by outlining which agency, tier of government or non-government group has responsibility for implementing the action and reporting on the targets. Further detail on progress against the actions in previous versions of the plan would also be useful in determining whether the specified targets are achievable within the timeframe.

The 'percentage of national actions completed' target of 50% by 2026 and 100% by 2030 for several categories would be strengthened by providing information within the report on anticipated timeframes for each action, whether they are ongoing from previous plans or new actions, and defining who is responsible for implementation.

The 'Increasing level of compliance' target would be better supported by commentary within the report on the current level of compliance, frequency of illegal dumping and illegal imports in order to establish a baseline for reduction.

Recommendations:

Amend the National Action Plan section of the ANSP to include:

- anticipated timeframes for each action
- new or existing status of the action
- responsibility for implementation and monitoring.

Include commentary within the report on current rates of asbestos compliance, illegal dumping and illegal imports to establish a baseline for reduction.

That sufficient resources are available to ensure that the Plan can be implemented.

Asbestos Management System

While all participants have been identified in the updated matrix (Figure 1), further detail is required on the specific roles of each group, as it is unclear which actions sit under Local Government responsibility.

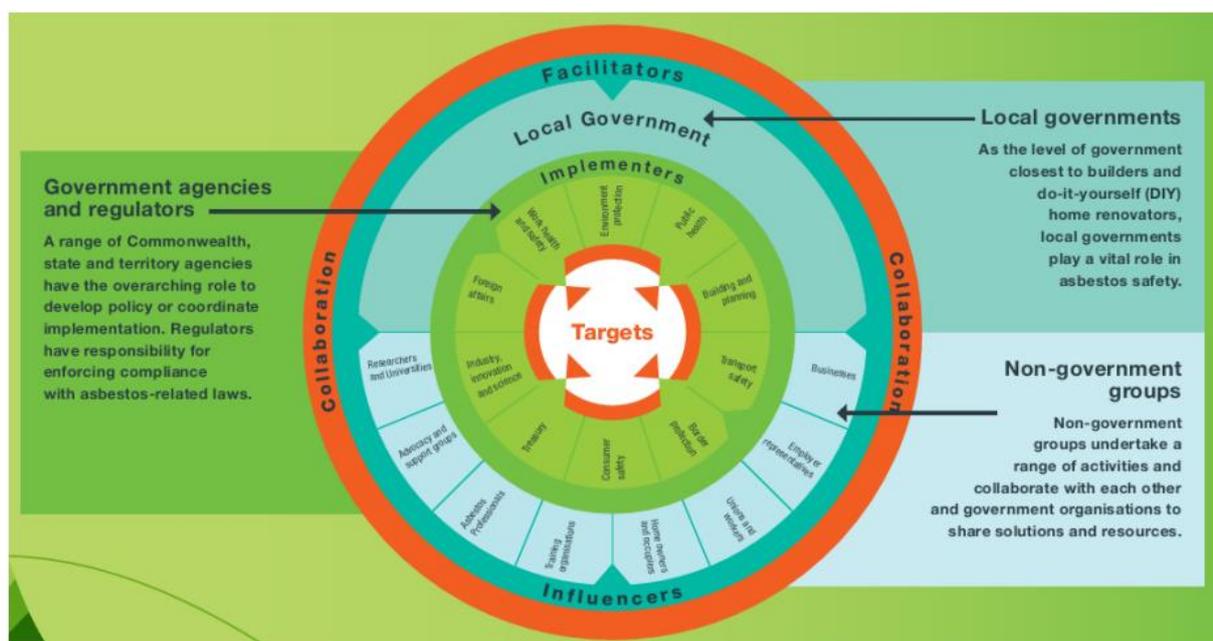


Figure 1: Asbestos Management System, Draft ANSP Phase Three

WALGA understands the intent to simplify the management system from previous phases of the plan, however the matrix used in Phase Two of the ANSP, which clearly specified the roles of each group within the system (Figure 2) is more effective in communicating the responsibilities of Local Government.

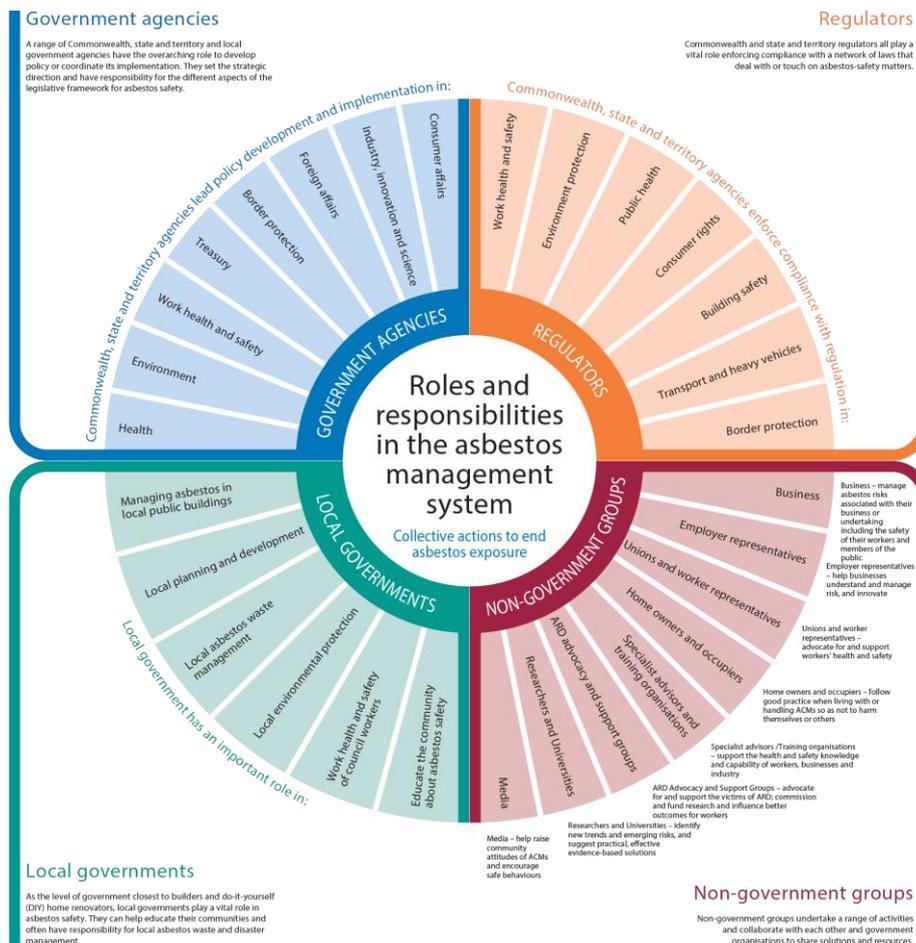


Figure 2: Asbestos Management System, ANSP Phase Two

Recommendation:

Amend the Asbestos Management System section to:

- **Define specific roles and responsibilities for each participant identified within the system, as outlined in the ANSP Phase Two.**
- **Ensure the role of Local Government in emergency preparation, response and recovery is clearly identified.**

Conclusion

Asbestos management is an ongoing and increasing challenge for Local Government, in particular asbestos management during and following emergency events, illegal disposal of asbestos into the environment and through Local Government services and the regulation of asbestos removal industry. Local Governments in regional and remote areas face additional significant and complex challenges, including the limited availability and cost of suitably qualified contractors, large areas of asbestos contaminated land requiring remediation and limited ability to fund asbestos removal and communities where property with asbestos is under, or not, insured.

Local Government considers that a coordinated and collaborative approach, with clearly identified roles and responsibilities and sufficient resourcing, will be essential to address this issue and anticipates the ANSP, and ASEA's, will provide the mechanisms to coordinate and fund national action.