

OHS ASBESTOS MANAGEMENT PROCEDURE

SCOPE

This Procedure relates to all activities under the management and control of Monash University in Australia and applies to affected workers; including staff, students, contractors and visitors.

PROCEDURE STATEMENT

The purpose of this document is to provide an overarching framework for the effective management of Occupational Health and Safety associated with asbestos containing materials (ACMs) at Monash University.

This procedure sets out the requirements to ensure compliance with the legislation and to eliminate or minimise the risks that asbestos may pose to workers.

Under the current legislation ACM is not permitted to be imported, installed, used or re-used under any circumstances.

1. Abbreviations

ACD	Asbestos Contaminated Dust or Debris
ACM	Asbestos Containing Material
CRP	Contractor Responsible Person
EPA	Environment Protection Authority
HSR	Health and Safety Representative
NATA	National Association of Testing Authorities
OH&S	Monash Occupational Health & Safety team, led by the Health, Safety and Wellbeing Manager
OHS	Occupational Health and Safety
SARAH	Safety and Risk Analysis Hub

2. Asbestos Management

2.1 Identification of Asbestos

- 2.1.1 Where it is reasonably practicable, Monash University must identify all asbestos present within its owned and controlled properties (where Monash University is a tenant within a property, the landlord must provide Monash University with a report or a register that identifies any asbestos present within the Monash University occupied buildings prior to occupation).

2.2 Asbestos Audit

- 2.2.1 OH&S will ensure that an asbestos audit (also known as a Division 5 audit) is conducted every 5 years as a minimum that will:

- Identify asbestos, where it is contained in material that is fixed or installed in buildings, plant or asbestos contaminated soil or dust;
- Where there is uncertainty as to the presence of asbestos (as a result of areas being inaccessible at the time) assume that asbestos is present or arrange for analysis of a sample to be taken; and
- Where asbestos has been identified determine:
 - The location of the asbestos;
 - The type of asbestos containing material;
 - Whether the material is friable or non-friable;
 - The condition of the material;
 - The likelihood for the material to sustain damage or deterioration; and
 - Any activities likely to be carried out that could damage or disturb the asbestos.

2.3 Asbestos Audit Specific to Demolition and Refurbishment

2.3.1 Where a Contractor Responsible Person (CRP) (as defined in the [Contractor Management Procedure](#)) from Monash University commissions or carries out demolition or refurbishment work on a building or plant where asbestos is fixed or installed, the CRP and the Contractor engaged will:

- Review the Asbestos Register
- Ensure a comprehensive audit of the building or plant is undertaken with regard to those areas likely to be affected by the works and not previously audited (Division 6 audit);
- Forward the report to OH&S to update the asbestos register; and
- Ensure ongoing assessment of areas that were previously inaccessible but will be impacted by the proposed works.

2.3.2 The CRP must provide the Asbestos Register, and the report of the Division 6 audit, to the person/s who will be performing the demolition or refurbishment works (and the register must be provided to the asbestos removalist, if removal works are necessary).

2.4 Asbestos Register Requirements

2.4.1 Monash University (OH&S) must record, in the Asbestos Register, the results of any asbestos identification audit or review.

2.5 Asbestos Register (Monash University Owned Properties)

2.5.1 The Asbestos Register must document:

- The location of the asbestos;
- The type of asbestos;
- Whether the material is friable or non-friable;
- The condition of the material (with associated risk rating);
- The likelihood for the material to sustain damage or deterioration;
- Any activities likely to be carried out that could damage or disturb the asbestos;
- Details of inaccessible areas that are likely to contain asbestos; and
- The date of each identification

2.5.2 OH&S maintain the Asbestos Register as an online database.

- Any enquiries with regard to the presence of asbestos in Monash University occupied buildings should be made to BPD (buildings.property@monash.edu or ohshelpline@monash.edu or 03 9902 0222).

2.6 Asbestos Register (Non-Monash University Owned Properties)

2.6.1 Where Monash University staff and students **undertake** activities in buildings leased by the University, BPD (Contracts) will request a copy of the current Asbestos Register for that building prior to occupation or any

refurbishment/maintenance work undertaken by Monash University. The register must not be greater than 5 years old and must be provided by the building owner.

2.7 Asbestos Register Risk Rating and Routine Condition Monitoring

2.7.1 A priority risk rating system for assessing the level of risk associated with identified asbestos is assigned to all identified ACM. The priority levels are:

Priority 1	P1	High Priority – Requiring immediate attention
Priority 2	P2	Medium Priority – May require action in the short term
Priority 3	P3	Low Priority – May require action in the medium term
Priority 4	P4	Very Low Priority – Requires ongoing management or longer term remedial action

2.7.2 A suitably qualified person (i.e. Occupational Hygienist) will be engaged by OH&S to review the condition of ACMs in Monash University owned buildings, and allocate a risk rating.

2.7.3 Routine monitoring of the identified asbestos will be conducted by BPD based on the priority risk rating that has been assigned. The priority risk rating and monitoring schedule is based upon the recommendations within the audit report or as otherwise determined by OH&S.

2.8 Currency of Register

2.8.1 The Asbestos Register must be reviewed and updated every 5 years, as a minimum. This work will be organised by OH&S and conducted by a suitably qualified person (i.e. Occupational Hygienist).

2.8.2 The Asbestos Register must also be updated by OH&S when the condition of the asbestos has changed or the asbestos has been removed.

2.8.3 Where asbestos has been found that was not previously identified within a Monash University owned premises or plant, the Asbestos Register must be updated by OH&S.

2.8.4 To facilitate the updating of the register all new reports (Division 6 audits, air monitoring, clearance etc.), pertaining to the identification, condition or removal of asbestos must be forwarded to OH&S.

2.8.5 The online Asbestos Register will be updated within 4 weeks of notification to OH&S.

2.9 Access to the Register

2.9.1 Relevant aspects of the Asbestos Register must be provided to:

- Any employer, employee or self-employed person conducting works that could potentially disturb the asbestos (BPD);
- Any asbestos licence holder engaged to conduct asbestos related activities (BPD);
- Anyone who proposes to occupy the workplace, upon request (BPD Contracts);
- Any person taking over the management and control of a Monash University owned site (BPD Contracts);
- Any person engaged to do work at the workplace, upon request (BPD); and
- When requested, the Health and Safety Representative for any affected Designated Work Group (OH&S).

2.9.2 The Asbestos Register will be readily available to any worker upon request by contacting OH&S via:

- T: 99020222 or
- E: ohshelpline@monash.edu

2.10 Labelling

- 2.10.1 All known ACMs in readily accessible locations in Monash University buildings must be labelled to indicate the presence of asbestos.



2.11 Asbestos Awareness

- 2.11.1 Asbestos awareness [information sheet](#) is available on the OH&S webpage.
- 2.11.2 As required, OH&S provide training to BPD Projects and Services workers with regard to this procedure and the Asbestos Register.
- 2.11.3 Contractors are informed of their obligations with regard to asbestos management via the mandatory online [Contractor Induction and Contractor website](#).

2.12 Work with Potential to Disturb ACM (Appendix A1)

- 2.12.1 CRP and contractors must refer to the Asbestos Register prior to undertaking any minor maintenance/repair works within a building or on plant. A Division 6 audit must be undertaken prior to any major works, such as refurbishment or demolition.
- 2.12.2 If it is deemed that any proposed works are likely to disturb ACM (or material assumed to be ACM) then the ACM must be removed by a licenced asbestos removalist prior to works commencing. This work will be organised through the CRP managing the work.

2.13 Suspect Material (Appendix A2)

- 2.13.1 In the event that a material is suspected to contain asbestos, or known to be an ACM and the condition is worse than that recorded in the register, then:
- Work that has potential to disturb the material must cease;
 - OH&S team is to be notified;
 - An incident report is to be raised in [SARAH](#);
 - The Asbestos Register must be re-checked to confirm presence;
 - If not included in the Asbestos Register, the material must either be assumed to be ACM or the CRP must make arrangements for the material to be analysed by a NATA accredited laboratory. Advice may be sought from OH&S;
 - If asbestos is not detected in the material, work may recommence;
 - If asbestos is detected in the material and the work is likely to disturb it, the CRP must arrange for the material to be removed prior to works commencing in accordance with section 4 of this procedure. Advice may be sought from OH&S.

2.14 Asbestos Incident Management (Appendix A3)

- 2.14.1 In the event that ACM is accidentally disturbed or asbestos contamination is discovered, notify BPD immediately and they will manage the process below:
- Access to the area must be restricted as soon as possible (signage, lock doors, hazard tape). If urgent access to the area is still required, it must be made safe as far as is reasonably practicable, in consultation with OH&S.
 - Items should remain in the area and no attempt should be made by persons to clean up the area.
 - OH&S, Safety Officer and Health and Safety Representative to be notified of the event as soon as possible.
 - OH&S to determine if WorkSafe is required to be notified of identified ACM.
 - Only trained competent persons wearing appropriate protective equipment are allowed to enter the area. This will typically be an external occupational hygienist and/or a licensed asbestos removal contractor.

- The presence of asbestos and the extent of contamination (debris and airborne) to be assessed and guidance obtained from a suitably competent person i.e. an occupational hygienist, regarding removal or remediation. Air monitoring within the contaminated area may be required to assist with a risk assessment and risk communication.
- Any necessary decontamination works to be undertaken by a suitably licenced asbestos removalist and advice from the suitably competent person i.e. an occupational hygienist. A clearance certificate to be obtained prior to reoccupation.

2.15 Fire

- 2.15.1 Following a fire, and if structurally safe to do so, a suitably competent person i.e. an occupational hygienist will determine the extent of asbestos contamination and provide advice on management and remediation and decontamination works undertaken as in 2.14 above.

2.16 Inhalation Exposure to Respirable Asbestos Fibres

- 2.16.1 Where it is suspected that workers may have had an inhalation exposure to airborne respirable asbestos fibres:

- The affected worker must immediately notify their manager/supervisor or the relevant CRP;
- OH&S, Safety Officer and Health and Safety Representative to be notified as soon as possible following the incident;
- An incident report must be entered in [SARAH](#);

The incident must be investigated in accordance with the [Managing OHS Hazards and Incidents Procedure](#).

3. Asbestos Removal Work (Appendix A4)

For any asbestos removal work, BPD will engage an external contractor who holds a current appropriate asbestos removal licence. The removalist must hold an A Class licence for removal of:

- Friable asbestos; or
- Asbestos contaminated dust or debris (ACD), unless that ACD is associated with removal of non-friable ACM or is only a minor contamination.

For removal of non-friable ACM and associated ACD, the removalist must hold an A or B class licence.

3.1 Information

The CRP must:

- 3.1.1 Provide the asbestos register for the relevant asset to the asbestos removalist prior to any asbestos removal work;
- 3.1.2 Provide a written scope to the asbestos removalist clearly indicating what ACM is to be removed and any specific requirements of the work;
- 3.1.3 Notify OH&S of all planned asbestos removal works prior to work commencing;
- 3.1.4 Request that the asbestos removalist provide a copy of the notification they submitted to WorkSafe Victoria.

3.2 Communication

- 3.2.1 The CRP to notify BPD Business Support of planned ACM removal works.
- 3.2.2 BPD Business Support must notify using a Works Notice the affected persons in the immediate and adjacent areas of any proposed asbestos removal work and the timing of the work.
- 3.2.3 The following minimum information must be provided regarding the planned asbestos removal:
- Statement that asbestos removal work is planned;
 - The location of the work;
 - When the removal work will commence;
 - When the removal work will conclude;
 - Access restrictions in place during the work;
 - Contact details of the BPD worker managing the work and/or OH&S.

- 3.2.4 BPD will also provide an information session to relevant stakeholders upon request.

- 3.3 Asbestos Control Plan
- 3.3.1 The asbestos removalist must prepare an asbestos control plan and provide it to the CRP. It must be readily available to Monash University workers throughout the duration of the removal work.
- 3.4 Access Control
- 3.4.1 The relevant CRP must ensure that appropriate processes are in place, so far as is reasonably practicable, to restrict access to the asbestos removal work area.
- 3.4.2 Authorised persons with access to the asbestos removal work area must comply with any direction of the licensed asbestos removalist.
- 3.5 Air Monitoring
- 3.5.1 The CRP must engage an independent competent person (i.e. occupational hygienist) to undertake air monitoring during friable asbestos removal work. Monash University may also undertake air monitoring for the removal of non-friable ACM. The analysis (fibre counting) following the air sampling must be conducted by a NATA accredited laboratory.
- 3.5.2 The CRP must ensure that the results of air monitoring are provided to:
- OH&S;
 - The licensed asbestos removalist;
 - Any worker (including Safety Officers and HSRs), or other persons, in locations adjacent to the removal area, upon request.
- 3.5.3 In the event of elevated air monitoring results all removal work must immediately cease until the cause is identified and the situation rectified.
- OH&S will notify WorkSafe Victoria of any air monitoring results that exceed the exposure levels.
- 3.6 Clearance Certificates
- 3.6.1 The asbestos removal work area must not be re-occupied for normal use until a clearance certificate has been issued by an independent competent person (i.e. occupational hygienist) engaged by the CRP. The clearance inspection after the completion of the removal work should include a confirmation that no ACMs are visually present and that all associated labelling has been removed.
- 3.6.2 Any worker (including Safety Officers and HSRs), or other persons in locations adjacent to the removal area, may request a copy of the clearance certificate from OH&S
- 3.7 Record Keeping
- The CRP must:
- 3.7.1 Provide records of asbestos clearance certificates to OH&S;
- 3.7.2 Keep copies of the clearance certificate on the project file.
- 3.8 Asbestos Register Maintenance
- 3.8.1 The Asbestos Register to be updated by OH&S upon receipt of clearance certificates to reflect the asbestos removal work that was undertaken.
- 3.8.2 The Asbestos Register will also be updated upon receipt of inspection reports undertaken as part of a Division 6 audit.
- 3.9 Disposal of ACM
- 3.9.1 ACM and asbestos contaminated waste must not be stored on Monash University property other than waste that is bagged, labelled and is awaiting impending disposal.
- 3.9.2 Any asbestos contaminated clothing must be laundered in accordance with WorkSafe Victoria requirements.
- 3.9.3 The disposal of asbestos waste following removal, or any loose ACM debris, must be conducted by a licensed asbestos removalist, in accordance with the EPA regulations.
- 3.9.4 The CRP must obtain a waste transport certificate from the removalist that confirms compliant disposal of ACM in accordance with the EPA regulations.

4. Responsibility for Implementation

- 4.1 A comprehensive list of OHS responsibilities is provided in the document [OHS Roles, Responsibilities and Committees Procedure](#). The responsibilities with respect to asbestos management are listed below.
- 4.1.1 **Buildings and Property Division (BPD) – Property and Leasing**
- Request the Asbestos Register for all Monash University occupied leased properties, when required and forward to OH&S; and
 - Provide copies of the Monash Asbestos Register to the tenants of Monash owned properties.
- 4.1.2 **Buildings and Property Division (BPD) – Planning**
- Develop, implement and maintain a long-term plan for asbestos abatement for the University;
- 4.1.3 **OH&S:** Relevant responsibilities in above list, plus:
- Guide stakeholders with regard to asbestos related matters/risk;
 - Develop and provide awareness training with regard to asbestos and this procedure;
 - Assist with asbestos incident management and investigation;
 - Identify ACM within Monash University controlled assets; and
 - Hold and maintain the Monash University Asbestos Register.
- 4.1.4 **Head Unit**
- Ensure that due diligence is undertaken prior to the procurement of assets to ensure, as far as practicable, that the asset does not contain asbestos.
 - Seek advice with regard to the process for this and/or questions that should be asked prior to purchase from Procure to Payment Services.
- 4.1.5 **Workers**
- Comply with this procedure;
 - Report hazards/incidents related to ACM on [SARAH](#); and
 - Undertake training as required.
- 4.1.6 **Contractor Responsible Persons**
- Responsibilities of the Contractor Responsible Person (CRP) are described in the relevant sections of this procedure.
- 4.1.7 **Contractors:**
- For works involving maintenance/repair/refurbishment/demolition of Monash University buildings or plant:
- Comply with relevant aspects of this procedure;
 - Request access to the Asbestos Register; and
 - Report hazards/incidents relating to ACM to Monash University contact.

5. Records

- 5.1 Refer to [OHS Records Management Procedure](#) for general requirements.

Record	Retention Period
Asbestos Register	Indefinitely
Clearance Certificates	Indefinitely
Air Monitoring Reports	Indefinitely
Division 5 and 6 Audit Reports	Indefinitely
Asbestos Control Plans	Indefinitely

DEFINITIONS

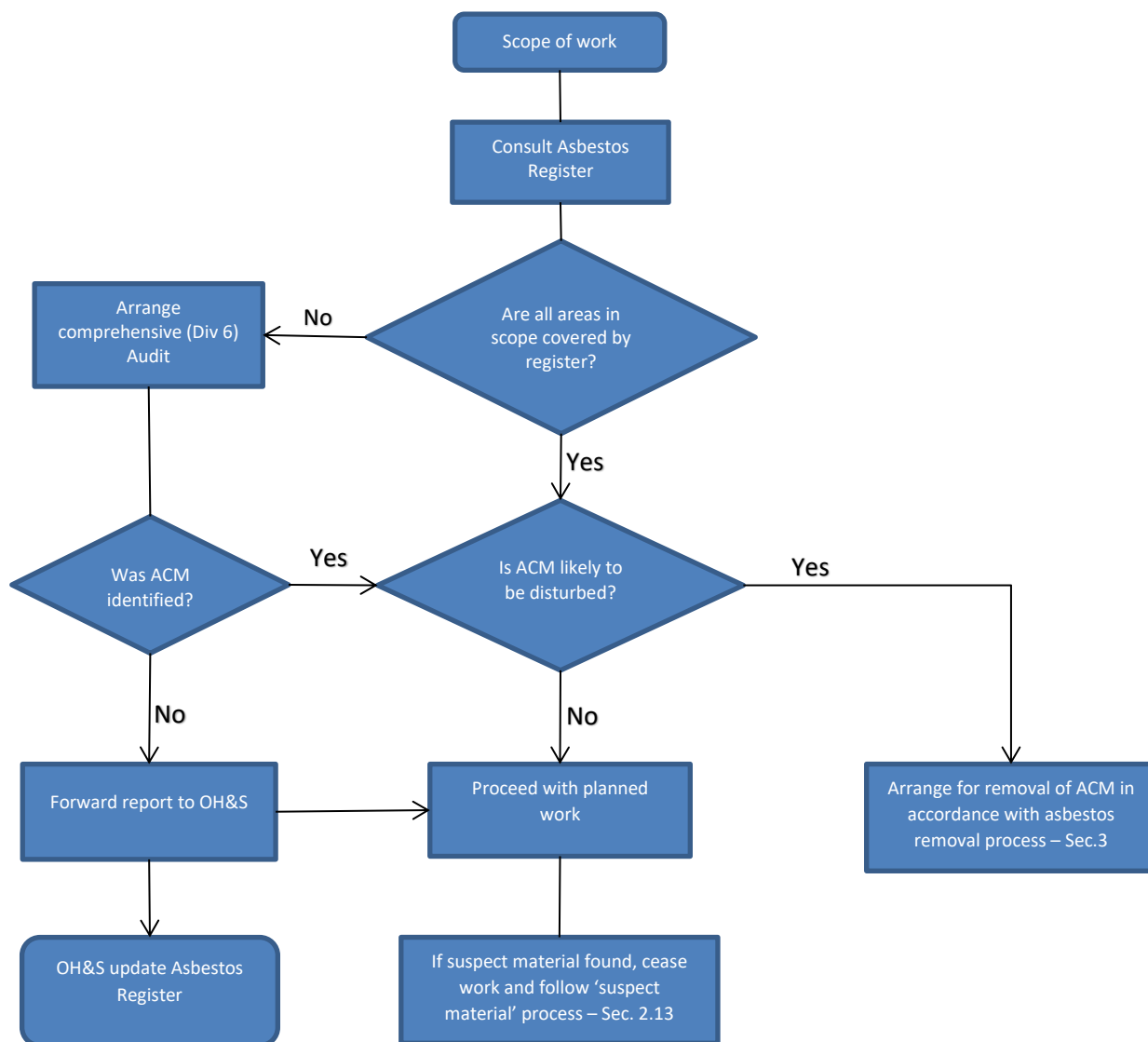
A comprehensive list of definitions is provided in the [Definitions Tool](#). Definitions specific to this procedure are as follows.

Key word	Definition
"A" Class Removalists	An employer, or self-employed person, who is licensed to undertake the removal of: <ul style="list-style-type: none"> any amount of friable asbestos or ACM any amount of ACD
ACM Incident	An event involving the disturbance of ACMs that has potential to cause significant risk associated with exposure to asbestos fibres.
Airborne Asbestos	Asbestos fibres that typically have been released from the parent material and are suspended in the air. For assessment of risk to health, only airborne fibres of respirable size are assessed.
Asbestos	The asbestiform varieties of mineral silicates belonging to the serpentine or amphibole groups of rock-forming minerals, including actinolite, or amosite (brown), anthophyllite, chrysotile (white), crocidolite (blue) and tremolite asbestos.
Asbestos Containing Materials (ACM)	Any manufactured material or object that as part of its design contains asbestos.
Asbestos Removal Work	The process of removing asbestos that is fixed or installed in a building, structure or plant to the point where it is no longer contained.
Asbestos Removalist	A person conducting a business or undertaking who is licensed to undertake asbestos removal work.
Asbestos Waste	Asbestos that has been removed and any disposable items used during asbestos removal work (such as plastic sheeting, disposable tools, used vacuum filters and disposable personal protective equipment)
Asbestos-Contaminated Dust or Debris (ACD)	Dust or debris that has settled within a workplace and is, or is assumed to be, contaminated with asbestos.
B Class Removalists	An employer, or self-employed person, who is licenced to undertake the removal of: <ul style="list-style-type: none"> any amount of non-friable asbestos or ACM ACD associated with the removal of non-friable asbestos or ACM
Contractor	A person from another organisation engaged through a service contract who is actively participating in Monash University related activities and for whom Monash University is not their sole employer
Division 5 audit	A visual inspection conducted by an Occupational Hygienist to identify ACM.
Division 6 audit	A destructive investigation conducted by an Occupational Hygienist to identify ACM prior to any demolition or refurbishment.
Friable Asbestos	ACM that is in a powder form or that can be crumbled, pulverised or reduced to a powder by hand pressure when dry.
Immediate and Adjacent Area	An area near where asbestos removal work will take place or an area adjoining or directly facing the removal area (e.g. one or more neighbouring buildings, or levels above and below the removal area)

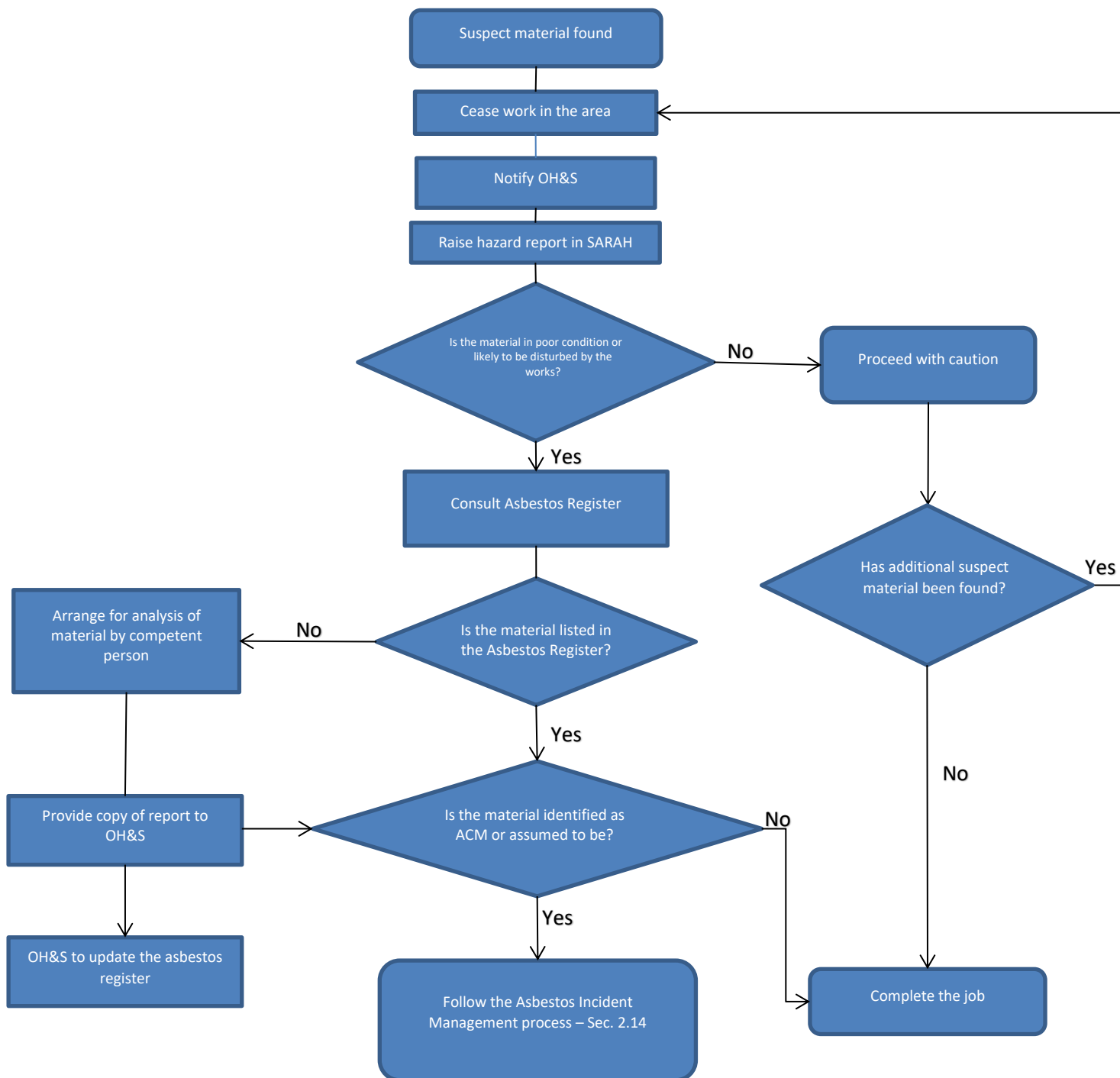
	within the same building).
NATA-Accredited Laboratory	Testing laboratory accredited by the National Association of Testing Authorities (NATA) Australia.
Non-Friable Asbestos	Material containing asbestos that is not friable, including material containing asbestos fibres reinforced with a bonding compound.
Plant & Equipment	Any machinery, equipment, appliance, container, implement or tool, and includes any component or anything fitted or connected to any of those things.
Respirable Asbestos	Fibres that are more likely to reach the small airways and alveolar region of the lung due to having a length of more than five microns and an aspect ratio ratio (length/width) greater than 3:1.

APPENDIX:

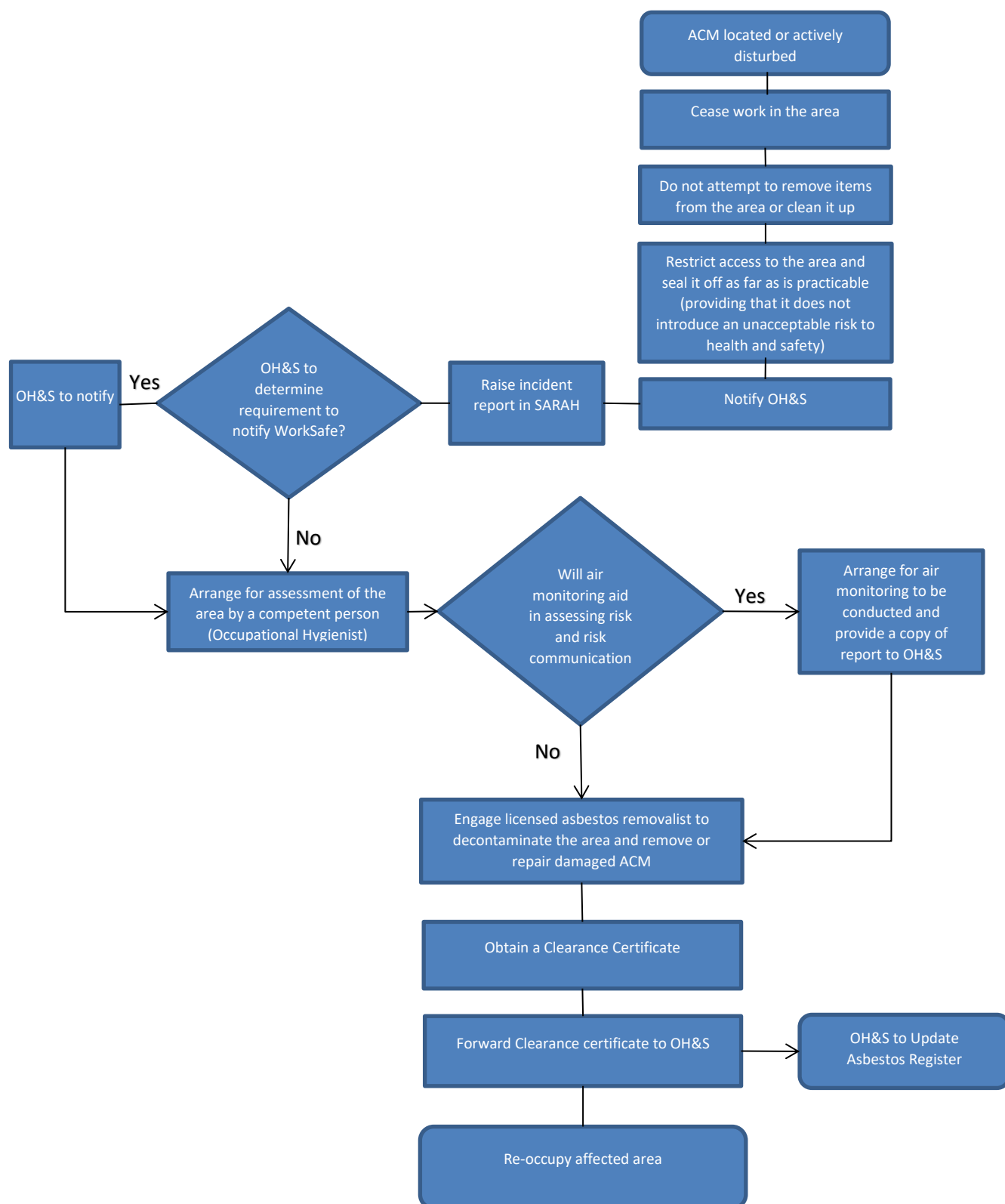
A1: Planned work to a Building or Plant



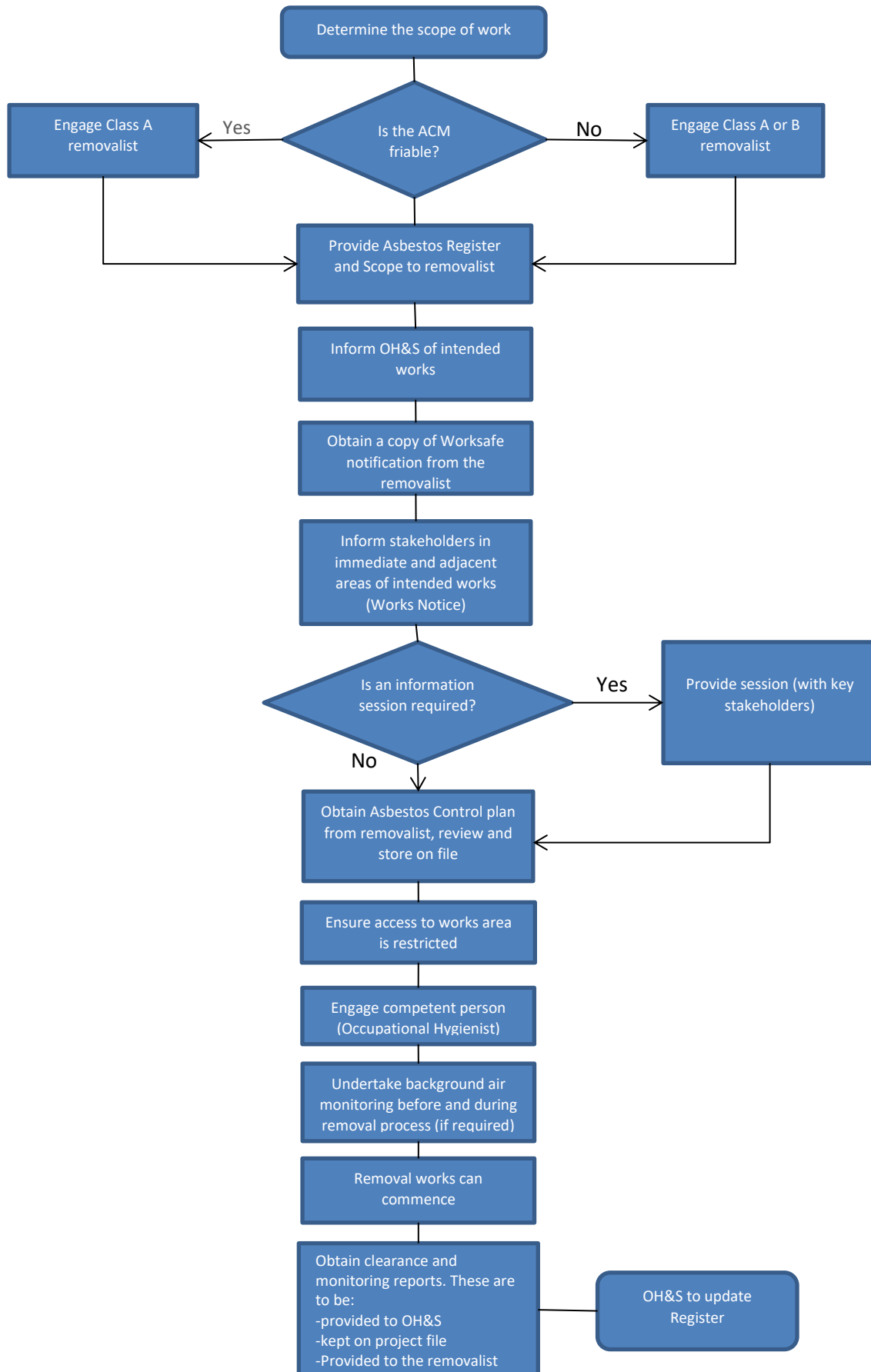
A2: Suspect Material in Building or plant



A3: Asbestos Incident Management



A4: Asbestos removal work



GOVERNANCE

Parent policy	OHS&W Policy
Supporting procedures	Monash University OHS Documents <ul style="list-style-type: none"> • Contractor Management Procedure • Managing OHS Hazards and Incidents Procedure • OHS Records Management Procedure • OHS Roles, Responsibilities and Committees Procedure
Supporting schedules	N/A
Associated procedures	Australian and International Standards <ul style="list-style-type: none"> • ISO 45001:2018 Occupational Health and Safety Management Systems Guidance Material <ul style="list-style-type: none"> • Compliance code 'Managing Asbestos in Workplaces' (2019) Victoria • Compliance code 'Removing Asbestos in Workplaces' (2019) Victoria
Related legislation	Dangerous Goods Act 1985 (Vic) Occupational Health and Safety Act (2004), Victoria Occupational Health and Safety Regulations (2017) Victoria
Category	Operational
Approval	Chief Operating Officer & Senior Vice-President 14 December 2022
Endorsement	Monash University OHS Committee 1 December 2022
Procedure owner	Health, Safety and Wellbeing Manager
Date effective	15 December 2022
Review date	2025
Version	3.0
Content enquiries	ohshelpline@monash.edu

DOCUMENT HISTORY

Version	Date Approved	Changes made to document
1	November 2016	OHS Asbestos Management Procedure
1.1	August 2017	1. Updated certification logos in header 2. Updated OHS Regulations to 2017
2.0	December 2019	1. Updated certification logo in header 2. Updated definitions for Asbestos Containing Material and Respirable Asbestos 3. Clarified type of asbestos containing material in section 3.2 4. Updated sections 3.3 and 5 to clarify the responsibilities of Contractor Responsible Persons
2.1	July 2021	1. Updated certification logo in footer to ISO 45001 2. Updated the Standard to ISO 45001 under "Associated procedures" in the Governance table 3. Updated OHS Policy under 'Parent Policy' to OHS&W Policy
3.0	December 2022	1. Flowcharts updated and moved from the main body of the procedure to appendices.

		<ol style="list-style-type: none"> 2. Added definitions for Division 5 and Division 6 audit 3. Added that ACM is not permitted to be imported, installed, used or re-used under the Procedure Statement. 4. Removed the Background section (Section 2) 5. Removed CRP responsibilities from the Responsibilities for Implementation section and as they are listed in the relevant sections of the procedure. 6. Replaced “Staff”, “Students”, “Contractors” and “Visitors” with the term “Workers”, where relevant. 7. Updated the abbreviations sections to include CRP and NATA. 8. Removed the requirement to maintain hard copies of the asbestos register. 9. Removed section 3.11 – Strategic Asset Management Requirement. 10. Update section 3.12 to Asbestos Awareness from Training. 11. Deleted section 3.15 – Asbestos incident management and incorporated into section 2.14 – Accidental Disturbance and Contamination. 12. Removed section 4.2 – Notification to the regulator as it is the responsibility of the removalist. 13. Clarified that the asbestos register provided for leased buildings must be no older than 5 years - section 2.6.1 14. Added CRP responsibility to notify BPD of planned ACM removal, section 3.2.1 15. Incorporated section 4.7 – Clearance into section 3.6 – Clearance Certificates. 16. Clarified specific responsibility for implementation in section 4. 17. Simplified wording to improve flow and clarity. 18. Added that ACM waste cannot be stored on Monash property in section 3.9.1 19. Added the requirement for CRP to obtain a waste transport certificate from disposal company in section 3.9.4
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