



## Submission Template

### Encompassing:

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

**Submission from:** Local Government Association of South Australia

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*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](mailto:engage@asbestossafety.gov.au)

Consultation closes on **Friday 14 October 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- do not publish submission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

**Please note this submission has been developed based on information from member councils.**



## 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?**

It is recognised that the draft Guidelines have been developed as a high-level strategic document to support local government to take a preventive approach to mitigating against the illegal dumping and improper disposal of asbestos.

The 'barriers' framework located on page 13 is a clear representation of the key factors that can lead to issues. The strategies throughout the draft Guide to mitigate these challenges focus on preventative actions.

Members have advised of the importance of taking a preventative approach to address these challenges, but also understand the importance of providing resourcing to implement surveillance, enforcement and clean-up activities.

To support local government with implementing a prevention approach, it is suggested that a communication plan template be developed to provide clear direction for agencies to implement effective and engaging awareness campaigns.

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?**

The draft Guide provides a strategic approach as opposed to specific procedures/requirements to implement in addressing illegal dumping and improper disposal of asbestos.

It is suggested that the example tactics listed within the document are expanded or altered. For example, the table on page 20 'Expand capability' specifically "to safely prepare asbestos for disposal". It is suggested that this would need to be carefully considered. There are concerns that by implementing such a tactic local government could be seen to be encouraging residents/community members to handle this material as opposed to engaging a licenced operator.



The table located on page 21 'Increase opportunity' implies that local government are to encourage residents to remove small pieces of asbestos from their properties and provide assistance with asbestos removal kits and personal protective equipment. Although there is a disclaimer there is still concern about future liability to local government if not implemented appropriately or correctly.

The third table on page 21 'Build motivation' appears to contradict the above table with the statement "challenge community and professional beliefs that it is safe and easy to remove asbestos oneself". It is recommended that a stance on engaging a licenced operator for the removal and disposal of asbestos is encouraged for the safety of the community.

Overall, the draft Guide is an appropriate framework for local government to implement programs to reduce illegal dumping and improper disposal of asbestos.

### 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 nine key principles are easy to read and understand. However, it is suggested that the information provided under each principle should be expanded. It is suggested that information below be listed in dot point format rather than as paragraphs. Practical examples to suit these principles would also be useful (ie. documents, meetings, routine reviews of asbestos guidelines and framework or available tools etc.)

### 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?**

Prevention is a key aspect to reducing incidents associated with illegal dumping and improper disposal of asbestos. By taking a preventative approach it can reduce the environmental, social and financial impacts.

It would be useful to still have advocacy and recognition associated with the need to have resources allocated for surveillance, enforcement and clean up associated with asbestos.



- 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?**

Feedback from councils suggested that there was a lack of awareness on these resources, which since reviewing the draft Guide are now aware and note that they are easily accessible. We encourage these resources to be promoted. Please consider incorporating the web addresses into the document so individuals reviewing a printed version can still access the resources.

#### **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?**

As illegal dumping and improper disposal of asbestos impacts on the waste management sector we recommend that the waste industry body is engaged. The Waste and Resource Recovery Association of Australia (WMRR) is the industry body for the waste management sector (both private and public). The guidelines could be provided to the industry body for distribution and promotion.

- 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?**

Yes - Case studies are fantastic. We would also like to see more detail in these case studies. They are a bit vague. Could we please get some more detail in the practical application of these case studies, or perhaps contact persons or a liaison between councils if anyone wishes to adopt the same strategies outlined in case studies.

- 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?**

On page 16 paragraph 3 - Link to "National Asbestos Awareness Week 2021 Stakeholder Campaign Pack." - all resources via this link are branded and include 2021 dates. Whilst this is an example, it would likely



prevent council staff using it. Developing resources that were not dated would be beneficial and better received by the community.

Alternatively, if there are materials that are not dated on the website, perhaps providing a link to them in the draft Guide would be better. Further to this, we would suggest the inclusion of written websites along with hyperlinks, as the report may be printed for ease of access.

### 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 draft Guide is very detailed and informative, the information is well divided and clear and logical to read. Only suggested improvement would be that given the report is so in depth and detailed, it may be overwhelming for councils with little to no measures in place to begin with. It would be great to see a simplified version of the guide with key action items.

The Case Studies included in the guide are a key highlight. They are a useful, practical tool for local government to learn practical approaches to tackling asbestos disposal management.

### Other comments

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

We appreciate the holistic approach to waste management, notably in the section describing interventions in the event of extreme weather, catastrophic events or natural disasters; and the particular acknowledgement of the additional room in kerbside landfill bins (given the push to utilise food organics and garden organics (FOGO) bins to their full potential.

This acknowledgement is key to ensure that considerations are made to ensure this does not result in the increased dumping of asbestos items in kerbside collection.

Lastly, well done on providing a thorough and useful guide. Local government can play an important role in asbestos management and the practical advice and examples provided will be of benefit to the sector.