

HEADS OF WORKPLACE SAFETY AUTHORITIES

CAMPAIGN REPORT

Demolition and Asbestos Removal in the Construction Industry

An Australian & New Zealand Joint Compliance Campaign



ACT WorkCover



Queensland Government
Department of Employment and Industrial Relations

Department of Labour
TE TARI MAHI



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1. Background

The Heads of Workplace Safety Authorities (HWSA) initiated this Joint Campaign in October 2004.

HWSA is a framework that brings together the most senior Executive Officers from the Australian (Commonwealth, State and Territory) and New Zealand Workplace Safety Authorities. Amongst other things, HWSA seeks to improve the operational coordination and enhance the operational consistency of the Workplace Safety Authorities.

The Demolition and Asbestos Joint Compliance Campaign was designed to maximise our collective impact on these activities.

SafeWork SA and WorkSafe (WA) agreed to coordinate the campaign at a national and trans-Tasman level, and each participating Workplace Safety Authority provided an officer to manage the Joint Campaign's delivery and data collection within its jurisdiction.

The Joint Campaign Management Group held 2 meetings prior to commencing the operational aspect of the campaign.

The first meeting, on 29 and 30 June 2005, scoped the campaign, agreed on an audit tool format, identified general timeframes, and addressed the required supporting documentation for stakeholder consultation, inspector briefings and media releases.

The second meeting, on 25 October 2005, finalised the targeted number of site visits for the campaign, the arrangements for the campaign rollout and the data collection and report preparation. It also endorsed a media strategy to support the campaign.

Each jurisdiction carried out stakeholder briefings prior to the commencement of the operational aspect of the campaign, which was carried out over a six-week period between 20 February and 31 March 2006.

2. Methodology

2.1 Campaign Objectives

The key objectives of the Joint Campaign were to:

Objective 1 - Improve the level of compliance in demolition work and any associated asbestos removal work.

Objective 2 - Improve the capability of main contractors and sub-contractors to recognize, manage and control demolition and asbestos related hazards

and risks.

Objective 3 - Increase main contractors and sub-contractors perceptions of the risk of detection and sanctions imposed where non-compliance with demolition and asbestos requirements is identified.

Objective 4 – Identify and promote best practice and good innovations in managing and controlling the demolition and asbestos related hazards and risks of the targeted work.

The campaign was primarily an inspector delivered operational compliance campaign and not a research campaign, although data collected may be used for benchmarking compliance in future campaigns relating to demolition and asbestos removal work.

2.2 Scope of the joint campaign

The scope of the campaign was restricted to:

- **Residential demolition sites.** Residential demolition sites meant a site where the demolition work related to the total demolition of the residence and included single storey or two storey housing, detached, semi-detached and townhouse domestic premises, regardless of the project value.
- **Commercial demolition sites.** Commercial demolition sites meant demolition work relating to the total demolition of a building or structure (other than residential sites), or the partial demolition of a building or structure where this affected the structural integrity of the building or structure.

Work not affecting the structural integrity of a building or structure, such as the removal of non-load bearing walls, was not included.

- **Asbestos removal work.** Asbestos removal work related to the removal of either friable or non-friable asbestos containing materials from the residential and commercial demolition sites (as defined above).

The following did not form part of this Joint Campaign:

- The management of in-situ asbestos containing materials.
- Refurbishment or partial demolition work on residential properties.
- Refurbishment work on commercial sites where the work did not affect the structural integrity of a part of the building or structure.

- The removal of asbestos containing materials where it was not part of the demolition process (eg; re-roof of a building, removal of asbestos cement fencing, removal of lagging in a plant room etc).
- Workplaces that were not demolition sites.

Duty holders subject to the campaign included principal contractors, main contractors, subcontractors and self-employed persons and associated workers.

2.3 Consultation with stakeholders

The campaign management group developed various documents to assist stakeholders and participating inspectors understand the campaign and the areas targeted for the campaign. These documents included:

- ***Inspectors briefing notes*** – set out the reasons for the campaign, the scope of the campaign, the timeframe for visits and other operational aspects of the campaign (attachment 3 – inspectors briefing notes).
- ***Information flyer for stakeholders*** – each authority produced an information flyer to inform stakeholders of the campaign prior to commencement, highlight further information available in relation to the local authorities requirements for demolition work and the flyer was handed out during site visits (attachment 4 – information flyers).
- ***Audit tool development*** – an audit tool was developed targeting 15 specific areas of demolition and asbestos removal work, allowing inspectors to record data on compliance or non-compliance and any enforcement actions taken (attachment 2 – audit tool)
- ***Webpage information*** - information on the campaign was posted onto the respective web pages of participating jurisdictions prior to the commencement of the campaign.
- ***Stakeholders engaged*** – in addition to the briefing for participating inspectors, each member of the campaign management group took responsibility for meeting with the relevant stakeholders within their jurisdictions. Information on the campaign and copies of the various documents associated with the campaign were provided prior to the campaign commencement. Several stakeholder organisations assisted by circulating campaign information to their members and posting information on their websites.
- ***Media release*** – each jurisdiction prepared a media release based on a template provided, ensuring a consistent message was presented during the launch of the campaign on 1 February 2006 (attachment 5 – media release from each authority).

2.4 Audit tool

An audit tool was developed to assist inspectors and relevant stakeholders in identifying the 15-targeted areas of the campaign. The audit tool was also used to record both the enforcement actions applied and the areas of compliance and non-compliance on the sites.

The specific targeted issues were consistent with the requirements of Australian Standard *AS2601 – Demolition of Structures* (attachment 2 – Audit Tool) and consisted of:

1. Demolition work plan on site
2. Demolition work plan in accordance with AS2601 or local requirements
3. Engineers report/advice (when required)
4. A competent supervisor on site
5. Site security
6. Signage
7. Overhead protection
8. Traffic control
9. Work at heights
10. PPE
11. Asbestos removal
12. Dust control
13. Site services
14. Scaffold
15. Amenities

As well as the targeted issues, other areas of non-compliance could also be identified and reported on where significant trends were identified.

The audit tool also allowed for details such as the type of structure being demolished to be identified as either residential or commercial (total or partial commercial demolition). The audit tool also categorised the demolition methodology utilised as either manual or mechanical demolition or a combination of both, and asbestos was categorised as either friable or non-friable asbestos materials.

The audit tool allowed for feedback on how successful we were at informing stakeholders of the campaign during the consultation phase and the associated media campaign.

Enforcement action taken during the campaign was to be consistent with each jurisdiction's local enforcement policy.

2.5 Proposed number of site inspections

During the planning stage, each participating authority proposed a target number of inspections consistent with the amount of demolition work occurring within its jurisdiction at the time of the campaign.

Table 1 – Proposed site visits

State/Territory	Proposed Campaign Site Visits
Australian Capital Territory	12
New South Wales	80
Northern Territory	8
Queensland	24
South Australia	20
Victoria	40
Western Australia	40
New Zealand	40
Total Site Visits Proposed	256

3. Results of Audits

The campaign results are based on the analysis of the 376 audits completed by participating inspectors during their campaign visits between 20 February and 31 March 2006.

Table 2 – Completed site visits

State/Territory	Completed Campaign Site Visits
Australian Capital Territory	7
New South Wales	89
Northern Territory	10
Queensland	42
South Australia	25
Victoria	55
Western Australia	52
New Zealand	96
Total Site Visits Completed	376

3.1 General compliance

The audit tool categorised issues as one of either 'compliant', 'non-compliant' or 'not applicable'. To obtain an accurate analysis of compliance and non-compliance, raw numbers of compliance and non-compliance were not utilised as they would seem disproportionately low on issues such as scaffolding where most cases were 'not applicable'.

For a more accurate analysis of compliance, the 'not applicable' figures were not included. Table 3 expresses the percentage of compliance as (compliant / [compliant + not compliant] * 100)

The campaign identified that where a competent supervisor was on site there was a greater level of compliance on targeted issues.

Table 3 – Percentage of Compliance Nationally

Targeted Issues	% Compliant	% Compliant when competent supervisor on site
Work plan on site	73.7	78.9
Work plan in accordance with AS2601 or local requirements	75.3	81.7
Engineer's report/advice	79.5	87.3
Competent supervisor on site	90.8	N/A
Site security	85.5	90.0
Signage	86.1	91.4
Overhead protection	78.2	79.6
Traffic control	95.1	97.4
Work at heights	83.8	87.1
PPE	88.1	92.5
Asbestos removal	73.3	81.4
Dust control	92.0	94.1
Site services	97.0	98.2
Scaffold	87.0	90.1
Amenities	92.9	95.9

The highest compliance was for site services at 97.0%, with the lowest compliance relating to asbestos removal at 73.3%.

Tables 4 and 5 provide details of the total numbers of compliance and non-compliance for each targeted issue, for each jurisdiction.

Table 4 – Compliance detected for each targeted issue

Total compliance

Jurisdiction	ACT	NSW	NT	NZ	QLD	SA	VIC	WA	Total
work plan on site	4	55	7	72	30	22	32	39	261
work plan in accordance with AS2601 or local requirements	7	43	6	38	23	21	35	41	214
Engineer's report/advice	0	13	6	23	6	2	15	5	70
Competent supervisor on site	7	62	8	85	31	23	47	43	306
Site security	6	68	9	80	33	25	47	39	307
Signage	5	79	10	74	25	25	41	39	298
Overhead protection	0	14	3	7	1	2	12	4	43
Traffic control	3	24	3	30	7	14	25	11	117
Work at heights	3	37	6	50	18	12	21	18	165
PPE	5	67	8	74	34	23	44	40	295
Asbestos removal	5	47	7	50	20	21	37	27	214
Dust control	5	64	10	63	31	22	42	40	277
Site services	7	71	9	83	32	24	46	51	323
Scaffold	3	13	6	30	5	5	16	2	80
Amenities	4	76	9	84	28	24	39	39	303

Table 5 – Non-compliance detected for each targeted issue

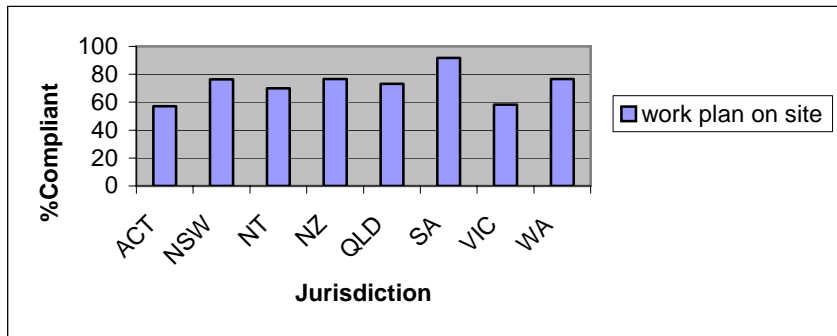
Total non-compliance

Jurisdiction	ACT	NSW	NT	NZ	QLD	SA	VIC	WA	Total
work plan on site	3	17	3	22	11	2	23	12	93
work plan in accordance with AS2601 or local requirements		18	3	13	11	1	17	7	70
Engineer's report/advice		3	2	2	2	1	7	1	18
Competent supervisor on site		8	2	9	6		5	1	31
Site security		15	1	14	6		4	12	52
Signage	2	5		8	10		10	13	48
Overhead protection		6		2	2		2		12
Traffic control		2		2			2		6
Work at heights		11	1	9	2		7	2	32
PPE		4	2	18	4		4	8	40
Asbestos removal	1	28	2	18	11		11	7	78
Dust control	1	2		12	3		4	2	24
Site services		3		2			4	1	10
Scaffold		7	1				4		12
Amenities	1	8		6	1		5	2	23

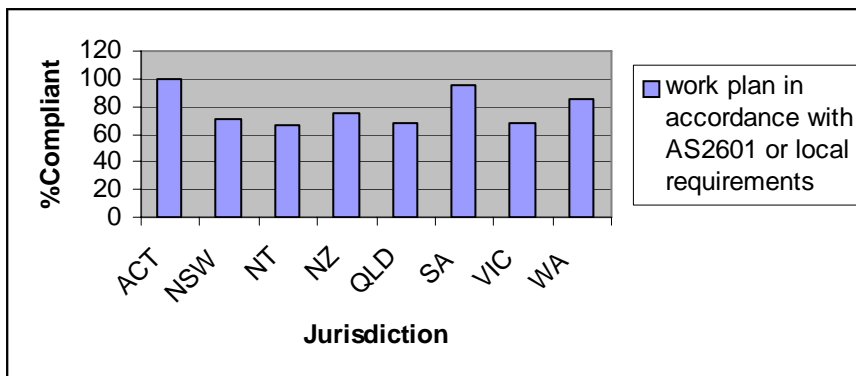
The following graphs represent the percentage of compliance for each targeted issue in each jurisdiction.

Generally there was a moderate to high level of compliance in the 15 targeted areas ranging from 80-100% in most jurisdiction (Graphs 1-16). There was a lower level of compliance for a work plan on site (see Graph 1) in ACT and Victoria and a lower level of compliance for asbestos removal in NSW and Qld (see Graph 11).

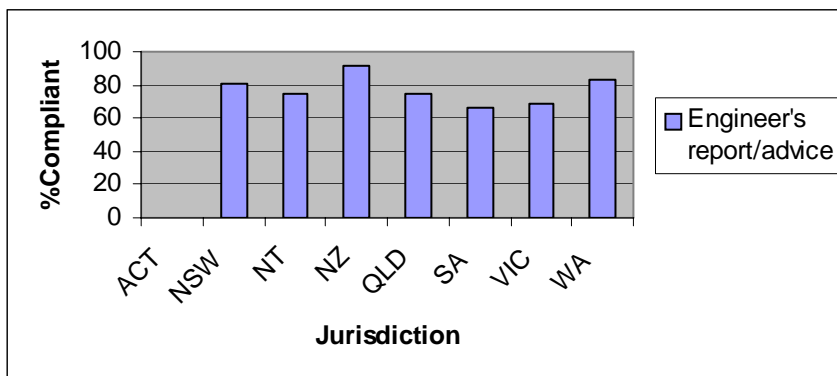
Graph 1- % Compliance for work plan on site



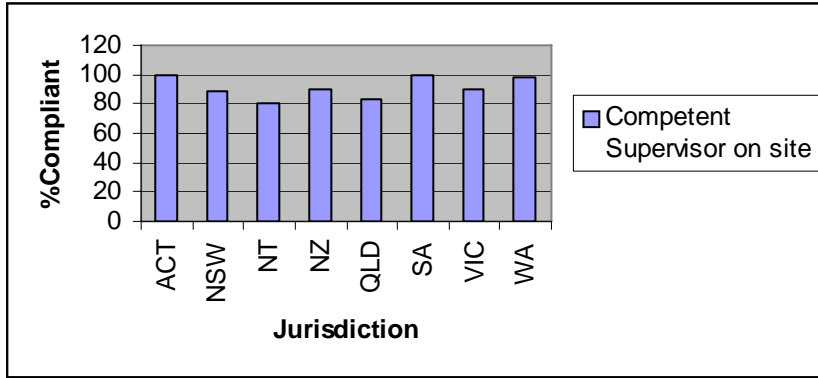
Graph 2- % Compliance for work plan in accordance with AS2601 or local requirements



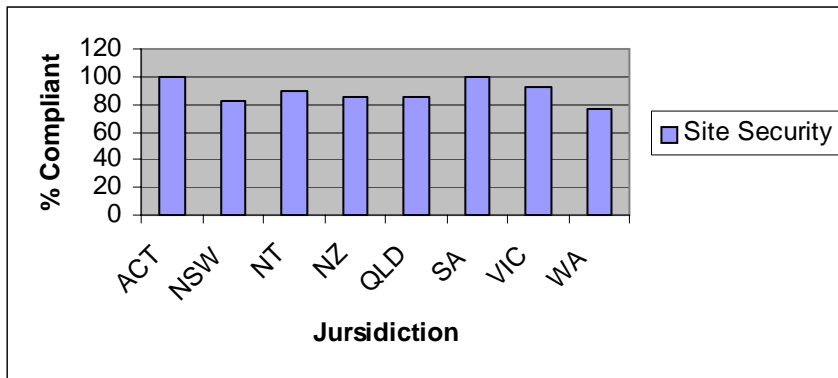
Graph 3 - % Compliance for Engineers report/advice



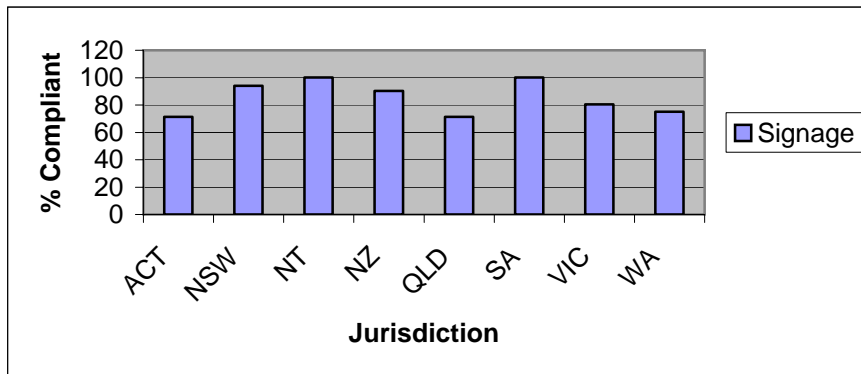
Graph 4 - % Compliance for Competent Supervisor on Site



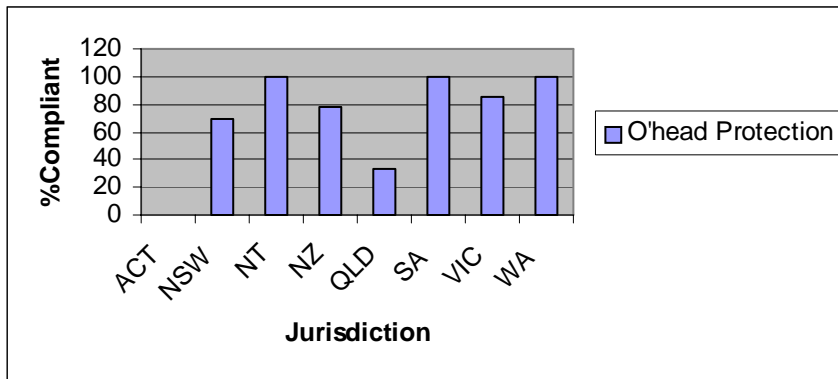
Graph 5 - % Compliance for Site Security



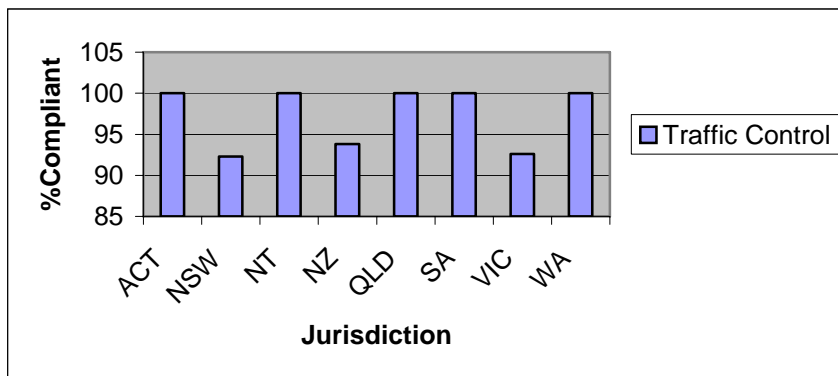
Graph 6 - % Compliance for Signage



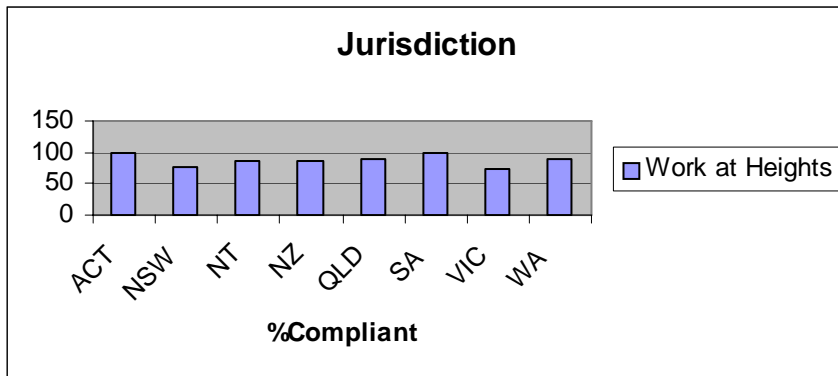
Graph 7 - % Compliance for Overhead Protection



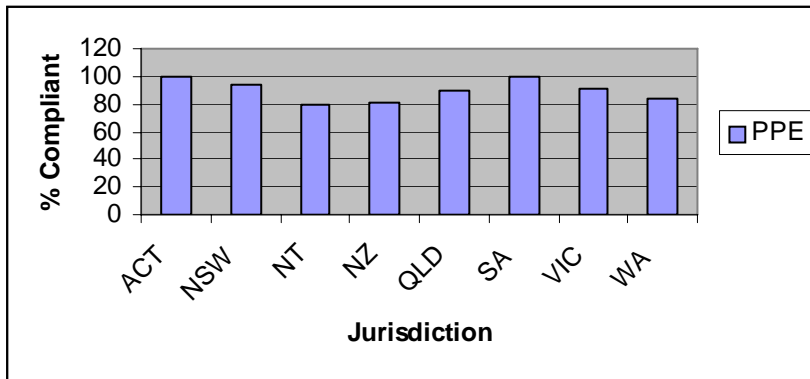
Graph 8 - % Compliance for Traffic Control



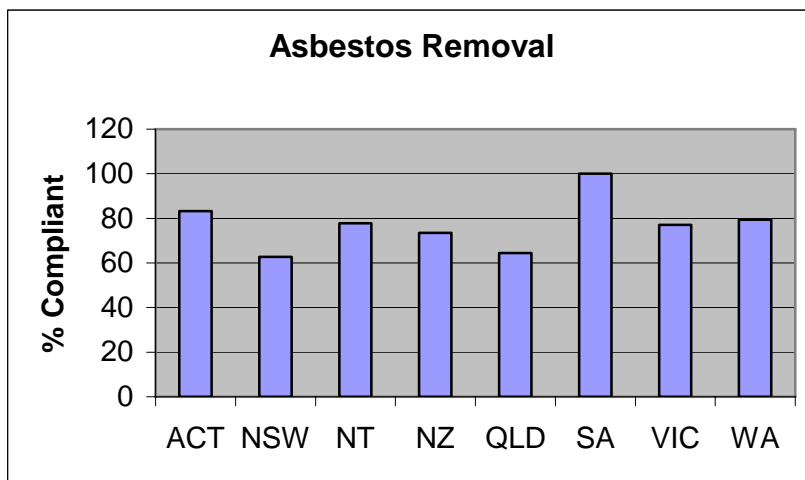
Graph 9 - % Compliance for Work at Heights



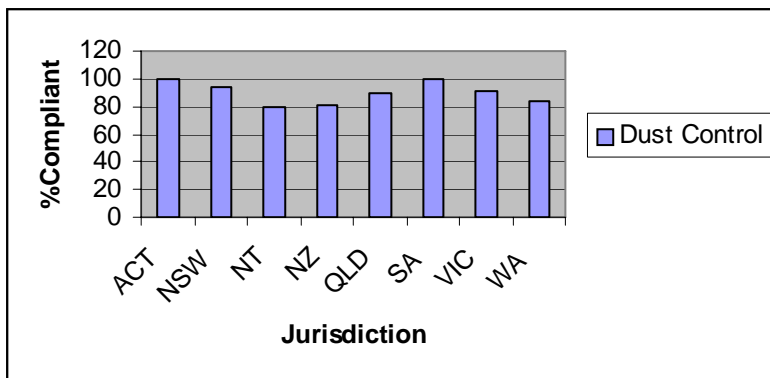
Graph 10 - % Compliance for Personal Protective Equipment



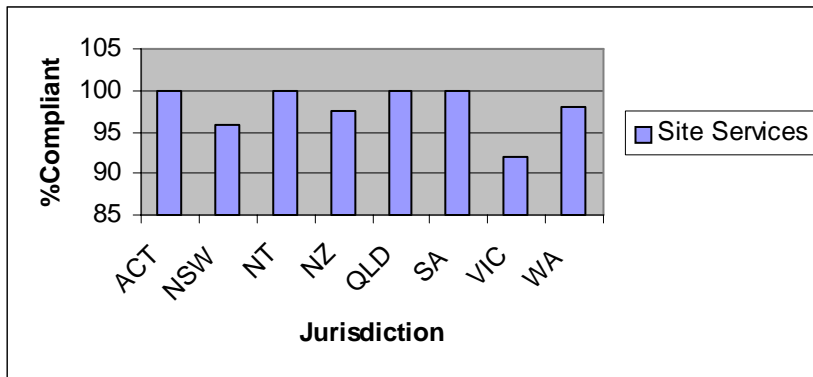
Graph 11 - % Compliance for Asbestos Removal



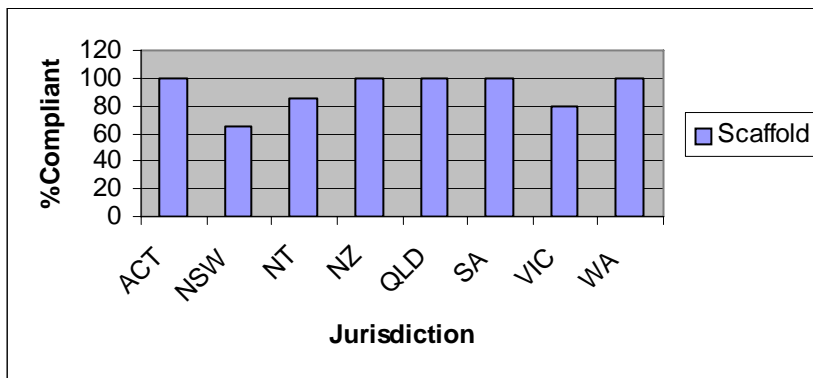
Graph 12 - % Compliance for Dust Control



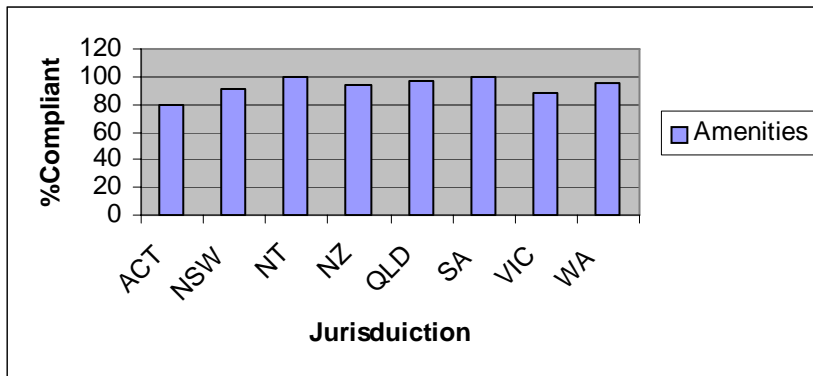
Graph 13 - % Compliance for Site Services



Graph 14 - % Compliance for Scaffolding



Graph 15 - % Compliance for Amenities on Site



Attachment 1 provides further detailed information concerning compliance, non-compliance and enforcement actions for each targeted issue, the type of demolition methodology used, the type of structure demolished (residential or commercial) and the type of asbestos removal taking place (friable or non friable).

3.2 Enforcement actions

Table 8 provides details concerning the range of enforcement actions taken by each jurisdiction for the 15-targeted issues only.

The range of enforcement actions reported on reflected the various enforcement tools available to the participating jurisdictions. It is important to note that not all authorities have the legislative ability to use all of the enforcement tools reported on.

In terms of enforcement actions, “further investigation” relates to ongoing investigations by the inspectorate as a result of detecting non-compliance at a particular demolition site during the campaign.

Table 8 –Enforcement actions taken for non-compliance with the 15 targeted issues

Jurisdiction	Improvement notice	Prohibition notice	Verbal directions	Infringement notice	Compliance notice	Warning letter	Further investigation
ACT	0	0	0	0	0	0	6
NSW	66	30	41	22	0	1	17
NT	0	1	3	2	1	4	1
NZ	11	7	103	2	0	6	42
QLD	23	16	11	4	0	0	2
SA	0	3	0	0	0	0	0
VIC	6	13	15	0	0	0	3
WA	16	5	47	0	0	0	1
Totals	122	72	223	30	1	11	72

Table 9 provides details concerning the total range of enforcement actions taken by each jurisdiction for all targeted and non-targeted issues of non-compliance found during the campaign.

Table 9 –Total enforcement actions taken for all non-compliance with any issues

Jurisdiction	Improvement notice	Prohibition notice	Verbal directions	Infringement notice	Compliance notice	Warning letter	Further investigation
ACT	0	0	0	0	0	0	7
NSW	94	41	42	27	0	2	17
NT	0	2	9	2	1	4	1
NZ	17	7	116	13	0	8	46
QLD	28	16	13	4	0	0	3
SA	1	3	0	0	0	0	0
VIC	14	16	24	0	0	0	3
WA	16	5	47	0	0	0	1
Totals	170	87	257	46	1	14	78

The issuing of verbal directions and improvement notices were the two most commonly used enforcement tools utilised in addressing non-compliance. The results also indicate further investigations were required for 78 instances of non-compliance, with the possibility that some of the further investigations may result in further enforcement action such as prosecutions in the future.

Further details of the enforcement actions carried out by each jurisdiction and each targeted issue can be found in Attachment 1.

4. Campaign Evaluation

The campaign management group believes the first three objectives of the campaign were met during the campaign, with the promotion of the results of this campaign conveyed to the various stakeholders within each jurisdiction achieving the fourth objective.

Objective 1 - Improve the level of compliance in demolition work and any associated asbestos removal work.

It is reasonable to conclude that the enforcement actions taken during the campaign to rectify non-compliance (Table 8), together with the information and advice provided by inspectors during site visits resulted in improvements to the demolition sites where non-compliance was identified.

Objective 2 - Improve the capability of main contractors and sub-contractors to recognize, manage and control demolition and asbestos related hazards and risks.

This objective was achieved by the distribution of the audit tool to stakeholders prior to the campaign commencing, the distribution of relevant information and advice during site visits and the information provided on each jurisdiction's web sites, with links to other guidance material.

Further, the enforcement actions taken will act as both an educational opportunity by highlighting hazards and risks requiring attention and as a deterrent to further non-compliance on future demolition and asbestos removal sites.

Objective 3 - Increase main contractors and sub-contractors perceptions of the risk of detection and sanctions imposed where non-compliance with demolition and asbestos requirements is identified.

This objective was achieved by way of the stakeholder briefings carried out prior to the commencement of the campaign, together with the associated media campaigns immediately prior to the campaign.

Objective 4 - Identify and promote best practice and good innovations in managing and controlling the demolition and asbestos related hazards and risks of the targeted work.

This objective will be achieved through the publication of this report and its findings. Although there were no innovations highlighted during the campaign, the information in this report can be used to promote best practice within the demolition and asbestos removal industries. Specifically, the importance of contractors having competent supervision on site during demolition work resulted in greater compliance in all other areas.

5. Conclusion

The campaign audit data and the associated enforcement actions for non-compliance indicates the greatest levels of compliance related to the management of site services, such as electricity or gas supplies, with the lowest levels of compliance related to asbestos removal work except in South Australia. Where there was a competent supervisor on site, there was a greater level of compliance on all other matters.

The two most commonly used enforcement tools were verbal directions and the issuing of improvement notices, both of which could be used by all participating jurisdictions, unlike other enforcement actions such as infringement and compliance notices which are not available to all jurisdictions.

Overall, the campaign identified that the level of compliance nationally appeared to be of a reasonable standard with respect to demolition activities. But improvements need to be considered for asbestos removal, as it was evident that levels of compliance were lower irrespective of a licence regime being implemented. The only exception to this was South Australia. This could be explained due to the strict legislative requirements that need to be met prior to asbestos removal being undertaken.

6. Recommendations

It is recommended that the Heads of Workplace Safety Authorities:

- Consider and endorse the findings of this report.
- Ensure the results of this campaign are conveyed to relevant stakeholders and can be accessed by way of the webpage of each authority.
- Initiates a re-run of this campaign in approximately 3 years time so that the compliance levels within the demolition industry can be re-measured against the baseline data that this campaign has now established.

7. Acknowledgements

The campaign management group recognises the team effort required to complete and report on this campaign, and thank the following people for their efforts;

- The participating inspectors for their efforts in completing 376 site visits within the campaign time frame.
- The support staff from each authority who assisted in various ways in the carrying out of this campaign, including administrative support, media releases and data collection and analysis.
- The various stakeholders involved from each jurisdiction.

The campaign management group was:

- | | |
|--|-----------------------------|
| • ACT WorkCover: | Steve Hart & Mick Hayes |
| • WorkCover New South Wales: | John Sharpin & Bill McColl |
| • <i>NT WorkSafe:</i> | Sandy Alp |
| • Workplace Health & Safety, Queensland: | Bob Bills & Darren Sharry |
| • SafeWork SA, South Australia: | Mary Nizamis & David Symons |
| • WorkSafe Victoria: | Steve Darnley |
| • WorkSafe Western Australia: | Tony Poulton & Dustin Lehr |
| • Department of Labor, NZ | Wayne Arnott |

8. List of Attachments

Attachment 1 – Data collected

Attachment 2 – Audit tool

Attachment 3 - Inspectors briefing paper

Attachment 4 – Information flyers

Attachment 5 – Media releases

Attachment 6 – Spreadsheet, other issues not compliant

Attachment 7 – Power-point presentation

Attachment 8 – Project concept paper