SUBMISSION FORM

Responses close:
5pm on Friday, 27 May 2016

Email to: guidanceandstandards@worksafe.govt.nz
Please put **Consultation on Asbestos Code of Practice** in the subject line.

OR send by post to:

FEEDBACK ON ASBESTOS CODE OF PRACTICE

WorkSafe New Zealand
PO Box 165
WELLINGTON 6140
Attention: Guidance and Standards

SUBMISSION: MANAGEMENT AND REMOVAL OF ASBESTOS – DRAFT CODE OF PRACTICE

Please use this submission form to comment on our draft guidelines. The form has space for you to:

- respond to general questions about the guidelines
- comment on particular sections
- provide overall comments.

Thank you for taking the time to provide feedback.

YOUR CONTACT DETAILS HERE PLEASE:

Your name: If this is a joint response, please add other people's names too.	Nick Walmsley on behalf of Water New Zealand representing NZ water utilities (councils)
Organisation name (and position, if responding on behalf of an organisation):	Technical Manager Water New Zealand
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☐ I wish to keep my contact details confidential

WorkSafe New Zealand will manage any personal information you supply in accordance with the Privacy Act 1993. If your response is made publicly available, your contact details will only be removed *if you have ticked the confidentiality box above*.

WorkSafe New Zealand may post your response on its website at www.worksafe.govt.nz. We may make your response available if answering a request under the Official Information Act 1982.

GENERAL QUESTIONS

1) Is the code easy to read? (Please consider the language used, as well as the overall structure and layout.) **Please note:** the final code is designed to be published on WorkSafe's websites in eight hyperlinked parts. This will make finding the information relevant to the particular PCBU easier than reading the Code from cover to cover in hard copy.

It is written in plain English but heavily biased towards buildings work and silent in relation to the large national asset base of underground water and wastewater pipes. See expanded information under GENERAL COMMENTS.

2) What is unclear or confusing?

There is no specific or direct comment, guidance or relationship with the large national asset base of underground water and wastewater pipes. See expanded information under GENERAL COMMENTS. Given this significant omission we have not provided detailed comment under the subsections below.

3) Are the diagrams easy to follow? Are other diagrams, tables or flowcharts needed?

See comments above.

4) Tell us what you think about the draft Code's definition of 'minor work' and 'routine work' (sections 21.2.1 and 21.2.2).

See comments above.

5) Tell us what you think about the draft Code's definition of 'minor contamination' (table 7, section 23.2.2).

We could not find the definition of 'minor contamination' anywhere in the Draft Code.

6) Tell us about the practice of spraying an adhesive solution on surfaces within the asbestos removal area before conducting air monitoring, and whether this is good practice (section 26.7).

See comments above.

7) Tell us what you think about the proposal to conduct asbestos-related work on soil if the contamination is unlikely to exceed trace levels, and to conduct asbestos removal work if the contamination is likely to exceed trace levels (section 18).

See comments above.

COMMENTS ON SPECIFIC SECTIONS

If you would like to make additional comments on specific sections, please add your comments below. If you have only general comments, please skip to the last page.

Specific comments

Please identify sub-section number (eg: *2.1.2*):

Please identify sub-section name (eg: *What can a PCBU expect from workers?*): Put in consultation specific example references.

Comment on the proposed content, clarity and accuracy (or other suggestions):

There is no specific or direct comment, guidance or relationship with the large national asset base of underground water and wastewater pipes. See expanded information under GENERAL COMMENTS. Given this significant omission we have not provided detailed comment under the subsections below.

GENERAL COMMENTS*

(for example, about the scope of the guidelines, or anything you haven't already commented on above).

Thank you for the opportunity of commenting on the draft CoP. Our comments are as follows:

This document is heavily predicated towards building work and has little content directly relevant to underground infrastructure such as water pipes. While several sections are written as generic requirements they are in fact not suited to many activities associated with repairing or replacement of underground water pipes and are therefore likely to be misinterpreted for such activities.

Background: In 1997 a nationwide survey on asbestos cement pipes in water supply and drainage systems was carried out. The responses received represented a population of 2 million. The results indicated that 97% of respondents had asbestos cement pipe in service for water supply purposes and that asbestos cement pipes comprise approximately 36% of piping in public water supply systems. More importantly the 1997 survey showed that most problems experienced with asbestos cement water pipe occur after 30 years and 50% of all asbestos cement pipes were older than 25 years.

The survey led to the development of the New Zealand Asbestos Cement Watermain Manual (NZACWM). This manual is currently being updated**. As part of this update we are including H&S advice on how to deal with such pipes during maintenance and replacement work. This advice is yet to be complete and we would appreciate meeting with WORKSAFE NZ to discuss its content.**

Asbestos Cement (AC) Asbestos cement is composed of approximately 10-15% asbestos fibres in a matrix of ordinary Portland cement or Portland cement and finely ground silica. The Process for making pipes was refined between 1906 and 1913 by Societa Anonia Eternit Pietra Artificiale of Genoa Italy. The pipes imported from the UK (Everite) in the 1940's, 50's and 60's were composed of asbestos fibres and Portland cement, and were water cured for 8- 10 days. AC pipes manufactured in Italy, Australia and New Zealand were steam cured in an autoclave.

AC pipe production ceased in 1984 and most pipes have been in service for at least 30 years.

There has not been any formal survey of AC pipes since 1997. Given the increase in population served, replacement of pipes and increase in pipe installations since that time, it is estimated that currently (2016) asbestos cement pipes comprise perhaps 25% of piping in water supply systems.

Water New Zealand complete an annual national performance review of water utility performance. Data for the financial year 2014-15 shows that 41 utilities took part covering water supplies to over 85% of the population. Data from this survey also indicates a total length of the water supply pipelines of this network at 36,436 km and a total value for the network assets at $8.7 billion.

Based on the above the total length of asbestos pipe in water supply service could be 9,000 km with a total asset value of $2.2 billion. Ultimately all of this pipe will be replaced as condition assessments warrant. However much of this pipe still has many years useful life left and good practice for monitoring its condition, maintenance and ultimate replacement techniques will allow its safe use to continue for some time.

We believe that there should be more specific content related to underground AC pipe infrastructure or this CoP should be re-titled for building work only.

Water utilities undertake or manage all types of asbestos related work mentioned in the CoP from time to time yet the scope of their work is only mentioned three times in the whole document (sections 4.3.6, 11.2.1and the example

* You can include further information with your submission. If you are sending your submission electronically and attaching a file, the file must be no more than 8Mb. We accept the following formats – Microsoft Word, Text, PDF, ZIP, JPEG.

on Pg51) and then only by indirect reference, with little relationship to specific work on underground pipes. Also, the $10m^2$ restriction of friable asbestos material is not a useful or arguably even relevant measure for work on AC pipes.

We understand that there is an emphasis on managing the more hazardous friable asbestos than the less hazardous non-friable asbestos, which necessarily focusses attention away from pipelines which are typically non-friable. While some of the content would be useful for work on pipelines, it would need adaptation to be useful for the typical water services provider, contractor or engineer.

Leaving unused pipes in the ground with managed locational information is a specific issue for water utilities that requires resolution. If the material stays intact in the ground it is arguably safe. We offer to work with WORKSAFE NZ to include for the above issues in the draft CoP and to agree 'approved methods' for selective but common work on this large asset base.

Water NZ represents all water utilities in New Zealand and we would welcome direct dialogue with you to resolve these significant issues.