



WATER SERVICES
ASSOCIATION OF AUSTRALIA

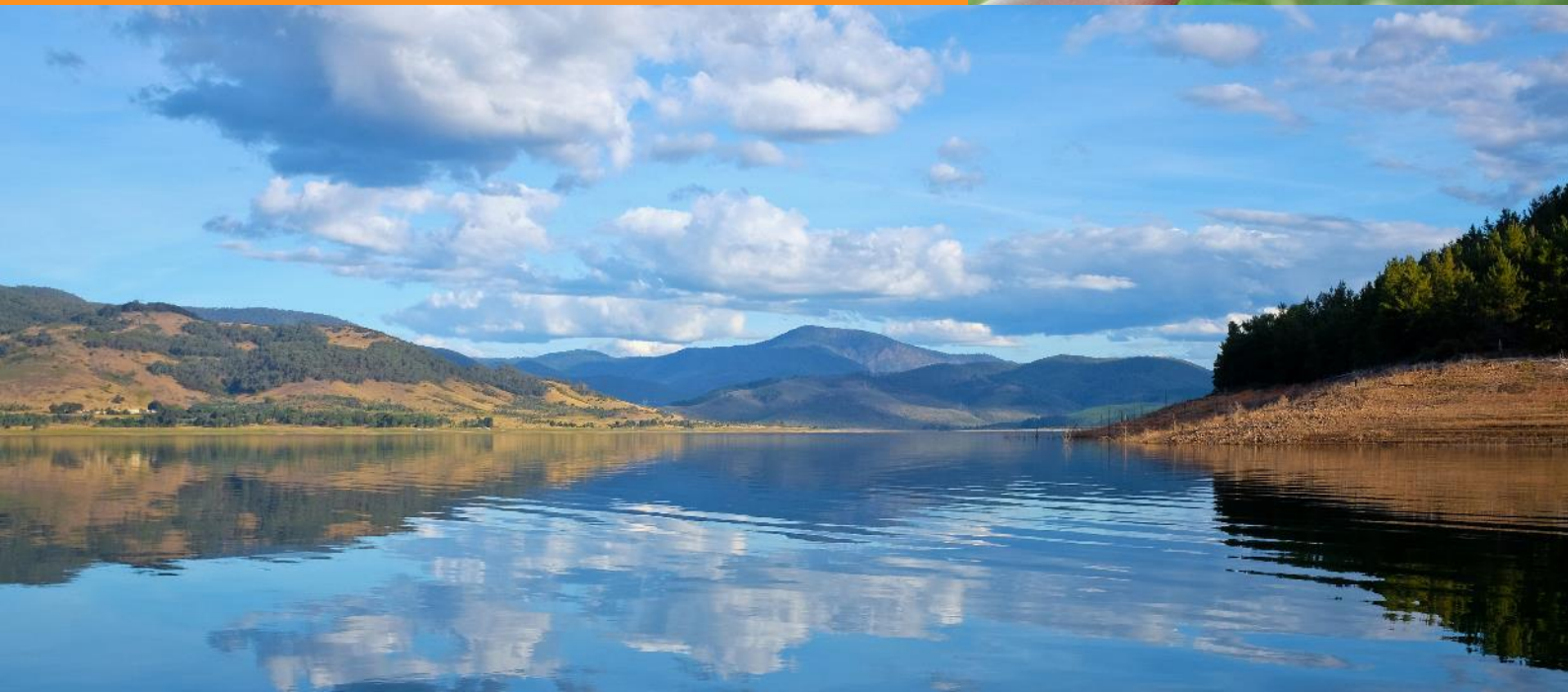


WSAA Submission

ASEA

Asbestos-Cement Water and Sewer
Pipe Management Guidelines

Public Consultation





7 August 2020

Attention: Stacey Tomley
Asbestos Safety and Eradication Agency
Level 10, 255 Elizabeth St
Sydney NSW 2000
engage@asbestossafety.gov.au

SUBMISSION: Asbestos-Cement Water and Sewer Pipe Management Guidelines Draft for public consultation.

Adam Lovell
Executive Director
Water Services Association of Australia
Level 8, 401 Docklands Drive
Docklands VIC 3008

I confirm that this submission can be made available in the public domain.

About WSAA

The Water Services Association of Australia (WSAA) is the peak body that supports the Australian urban water industry. Our members provide water and sewerage services to over 24 million customers in Australia and New Zealand and many of Australia's largest industrial and commercial enterprises. WSAA facilitates collaboration, knowledge sharing, networking and cooperation within the urban water industry. The collegiate approach of its members has led to industry wide advances to national water issues.

WSAA supports the important work that ASEA and the Water Pipes Working Group has done in the preparation of the guidelines. WSAA has been an active participant in the Water Pipes Working Group convened by ASEA to collaboratively develop these guidelines. WSAA appreciates the opportunity to provide significant input into the Asbestos-Cement Water and Sewer Pipe Guidelines issued for public consultation. The comments detailed in our submission below have been collated from our members' responses and reviewed by the WSAA representatives on the Water Pipes Working Group in order to provide consistent feedback.

WSAA's submission

WSAA's submission on the guidelines has been divided into two parts:

1. The collated response from our members on the 7 consultation questions
2. Clause specific comments

Consultation Questions

1. Are there additional asbestos-cement maintenance and management techniques that should be included in the guidelines? Or, alternatively, are there any that should be excluded from the guidelines?

The guidelines could benefit from a recommendation that the water utility should seek to opportunistically gather additional field information on the condition of their buried asbestos pipes. This information would be gathered from normal field operations on A/C pipes including tapping, repairs or CCTV condition assessment.

2. In which circumstances is it appropriate to use pipe bursting and pipe reaming methods for managing asbestos-cement water and sewer pipes? When using these methods is it possible to ensure that all asbestos-cement is removed from the ground during the clean up? How can the risks of future contamination be managed?

Based on member feedback, WSAA recommends that pipe bursting should only occur as a last resort. Any consideration of pipe bursting needs to be as part of a broader risk assessment. It is only to be used in situations where the risks resulting from pipe bursting are determined to be significantly lower than the risks from open excavation or bypassing. These risks could include the impact on the community, environment or cultural sensitive areas. In such situations an exemption from the WHS regulator should be sought prior to proceeding. The risk of future contamination would need to be managed using Asbestos registers and Geographic Information Systems (GIS) records.

3. Should the guidelines include more detail on the requirements to consult

WSAA's position is that the guidelines contain sufficient level of detail on the requirement to consult.

4. How should disused asbestos-cement water and sewer pipe be managed? Can it be adequately managed in situ?

WSAA's position on this matter has not changed since our letter to ASEA dated 3 October 2017. However WSAA believes the current guidelines appropriately address this issue.

It is WSAA's view that disused asbestos cement pipe can be safely managed in-situ. Disused asbestos remains the responsibility of the relevant authority (typically the water authority) and the relevant authority needs to demonstrate that the risk is being appropriately managed.

5. Should guidance on temporary storage and disposal of asbestos waste be added?

WSAA's position is that the current legislation adequately addresses temporary storage and disposal of asbestos waste.

6. Is there further practical guidance that should be included in the guidelines?

It is requested that the document include "the Victorian Compliance Code - Removing Asbestos in Workplaces" in the "Contacts and resources" section.

7. Are the guidelines user-friendly in terms of the language, layout and format? Or is there a better way to communicate a nationally consistent approach to managing asbestos-cement water and sewer pipes?

WSAA notes that the guidelines are user friendly and well written.

Clause specific comments

Clauses 13 & 14

WSAA would like to discuss with the Water Pipes Working Group amendments to Clauses 13 and 14 in the guidelines. The specific area of concern is the use of high pressure jetting to clear blockages in AC sewer pipes.

Clearing of sewer blockages is routinely undertaken using high pressure water jetting and cutting devices. These blockages can result from several causes and is almost always done in emergency situations to prevent a sewer spill. There is no reasonable or practicable alternative to the current methodology to clear the blockage in a timely fashion nor is it always practical to seek prior approval from a regulator in these circumstances.

The guidelines could benefit from greater clarity on two elements of the approval process for high pressure jetting in sewer pipes:

1. A standard protocol for the use of high pressure jetting on asbestos cement sewer pipes including, if possible, details of the appropriate risk controls required
2. Advice on when high pressure jetting could be used as an emergency response without prior approval from a regulator.

To assist the discussion, WSAA can provide reports from our members where minimal airborne asbestos cement fibres were measured during the high pressure jetting of sewer pipes.

Clause 17

It is recommended this clause be amended to include a reference to Clause 28 as shown below:

"WHS laws also require that an asbestos register (as defined in further in Clause 28) for the workplace... "

Clause 26

Please remove the following section of Clause 26:

"given that pipes are subject to weathering and chemical erosion particularly in areas where the water has high alkalinity or pH levels"

The clause does not define what "high alkalinity or pH levels" are and WSAA does not believe this clause assists management practices.

General Comments

The current document is well written and with minor changes as detailed above would be suitable for publication. Separately, for completeness, WSAA would like to discuss the issue of pressure jetting of asbestos cement sewer pipe to clear blockages.

For further information on this submission please contact James Goode, james.goode@wsaa.asn.au or 0434 609 618