Asbestos Disposal Management Plan

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# Definitions

In this plan, the following definitions apply:

|  |  |
| --- | --- |
| **Asbestos short-term storage and transfer sites (‘asbestos transfer sites’)** | Suitable locations with appropriate infrastructure to enable the safe consolidation and temporary storage of wrapped and sealed asbestos until it is taken to a licensed landfill for disposal (end fate). |
| **Licensed landfills** | A landfill is a specially designed and engineered facility for the burial of solid waste. The Environment Protection Authority Victoria require landfills to be licensed to protect the environment and meet community aspirations.  Landfills accepting commercial or domestic asbestos must have the relevant conditions on their licence to receive this waste stream. |
| **Site operators** | Owners and/or operators (local government or private businesses) of waste facilities such as landfills and waste transfer stations/resource recovery centres. Some facility owners may contract a third party to operate their facility. |
| **Commercial removalists** | * Asbestos removalists licensed by WorkSafe Victoria to remove asbestos from buildings and properties (residential or commercial/industrial). There are two different licence categories – Class A and Class B asbestos removal work. There are about 300 licensed removalists in Victoria. * Employers or self-employed persons who carry out **limited** asbestos removal work that doesn't require them to hold a licence under OHS regulations. For more information on legal responsibilities associated with removing and disposing of asbestos, see [asbestos.vic.gov.au/builders-and-trades/asbestos-removalists](https://www.asbestos.vic.gov.au/builders-and-trades/asbestos-removalists) |
| **Household removalists** | Private citizens/homeowners who remove non-friable asbestos from their own premises as part of renovating or refurbishing a home. |
| **Commercial asbestos waste** | Waste asbestos that has been wrapped and sealed and transported by a commercial removalist to an appropriately licensed or permitted facility for disposal. |
| **Domestic asbestos waste** | Waste asbestos that has been wrapped and sealed and transported by a household removalist to an appropriately licensed or permitted facility for disposal. |
| **Friable asbestos** | Products that are generally quite soft and loose and can be crumbled into fine material or dust with very light pressure, such as crushing with your hand. |
| **Non-friable or bonded asbestos** | When dry these products may not be crumbled, pulverised or reduced to powder by hand pressure (e.g. materials containing asbestos that have been mixed with cement or other hard bonding materials). Non-friable asbestos may become friable as a result of work processes over time, such as degradation due to chemical exposure, or due to other factors such as damage by fire. |

1. About the Asbestos Plan

The aim of the Asbestos Disposal Management Plan (Asbestos Plan) is to ensure Victoria has the infrastructure and supporting systems[[2]](#footnote-3) to enable safe management and disposal of waste asbestos and to meet future disposal needs.

We want to expand the current asbestos disposal system to give Victorians greater access to safe disposal options for wrapped and sealed asbestos. In this Asbestos Plan, we propose to develop an integrated network composed of existing licensed landfills and new asbestos short-term storage and transfer sites, referred to as **‘asbestos transfer sites’**.

The Asbestos Plan has three goals:

1. Asbestos disposal is easier
2. Asbestos disposal is safe
3. The asbestos disposal system is sustainable and able to meet changing needs.

The Asbestos Plan has a 10-year outlook and will guide our implementation over three years. To support Goals 1 and 2 over this time, we will:

* provide funding to support the development of infrastructure at asbestos transfer sites
* develop guidance, standards, training and communication materials to enable safe management of asbestos across the integrated network
* work with stakeholders to address potential barriers to expanding the system.

Under Goal 3, we will develop an ongoing funding and support model (to go beyond three years). Asbestos disposal infrastructure needs beyond 10 years will be considered in future Victorian Recycling Infrastructure Plans (VRIP). The VRIP is a statewide, long-term plan that will ensure Victoria has a reliable and safe waste and recycling system to meet the needs of an expanding population and safely manage our waste.

Sections 5.2 and 5.3 explain the Asbestos Plan goals and actions for government in more detail.

1. Introduction
   1. Why develop the Asbestos Plan?

Asbestos was widely used in commercial and domestic building materials across Victoria from the late 1800s until the 1980s. It was completely banned in Australia in 2003 because it causes fatal and debilitating diseases. The only way to prevent asbestos-related diseases is to eliminate the risk of exposure by safely removing asbestos-containing materials.

Victoria needs conveniently located infrastructure for the safe disposal of asbestos and asbestos-containing materials removed from our building stock and other sources to support the gradual removal of this legacy waste from the community. Asbestos removal should be done primarily, and preferably, by a licensed removalist. However, householders are also permitted to remove non-friable asbestos in accordance with strict guidelines. Both need access to safe disposal options.

Victoria has 26 landfills licensed to receive asbestos with only 21 currently accepting waste. Some of these facilities also have limitations on the type and amounts of asbestos they will accept.[[3]](#footnote-4) For many Victorians, these landfills are located more than a 60-minute drive from their household or business. Over time, the number of landfills will decline reducing access further.

The Victorian Government is funding the implementation of this Asbestos Plan under *Recycling Victoria* (Action 10.2) to ensure adequate disposal options for asbestos across the state.

* 1. How was the Asbestos Plan developed?

Sustainability Victoria (SV) is leading the development and implementation of the Asbestos Plan in partnership with key agencies and departments, including Environmental Protection Authority, Victoria (EPA), WorkSafe Victoria and the Department of Environment, Land, Water and Planning (DELWP) and with support from Waste and Resource Recovery Groups (WRRGs).

In 2019–20, SV did preliminary work to inform the Asbestos Plan. We engaged with local governments and government agencies to understand the emerging challenges as Victoria becomes less reliant on landfill (the end fate) and how to develop alternative management and disposal options. We developed a discussion paper to inform a consultation process with local government, waste industry and other stakeholders. We used feedback from this process to develop the Asbestos Plan.

* 1. Scope of the Asbestos Plan

### In scope

* Asbestos disposal system for wrapped and sealed asbestos and asbestos-containing materials (friable or non-friable/bonded) removed from commercial, industrial and residential sources. Volumes accepted by asbestos transfer sites will be determined with site owners and will align with relevant regulation under the new Environmental Protection Act 2017. These sites will be appropriately registered or licensed and are not expected to address disposal of significant volumes.
* Asbestos short-term storage infrastructure, management guidance and transportation from asbestos transfer sites to final disposal at a licensed landfill, including consideration of regulatory requirements.
* Liaising with and supporting selected landfill operators to ensure, where possible, that these facilities are able and willing to accept commercial and/or domestic asbestos waste as part of the asbestos disposal system.

### Out of scope

* Any aspects relating to **removing** asbestos from commercial, industrial and residential sources and transporting it to an asbestos transfer siteor directly to a licensed landfill by a removalist.
* Infrastructure, systems and guidance for disposing of asbestos-contaminated soils. Contaminated soils, including contamination with asbestos, will be addressed in the VRIP.
* Management or regulation of licensed landfills accepting asbestos.
* Education to raise awareness about asbestos in houses, buildings or sites, its impacts, management or removal.
  1. Links to legislation, policy and other organisations

### Legislative framework

The asbestos disposal system will align with the regulatory framework provided under:

* *Environment Protection Act 2017*
* *Occupational Health & Safety Act 2004*
* *Dangerous Goods Act 1985*
* other relevantlegislation and regulations.

### Recycling Victoria; a new economy

*Recycling Victoria* is the Victorian Government's 10-year policy and action plan for waste and recycling. It outlines key commitments and actions related to planning for waste and resource recovery. Actions linked to the Asbestos Plan include:

* 6.2: Illegal Waste Disposal program
* 7.2: Plan for recycling infrastructure over the long term
* 10.1: Policy and planning for hazardous waste management.

### National Strategic Plan for Asbestos Awareness and Management 2019–2023

The Victorian Government is a signatory to the *National Strategic Plan for Asbestos Awareness and Management 2019–2023* (NSP) which outlines a phased approach to eliminating asbestos-related diseases in Australia. The NSP facilitates all levels of government across Australia working together in a consistent and coordinated way to ensure effective asbestos awareness, management and removal of asbestos. The NSP has four priorities:

* 1. Improve asbestos awareness to influence behavioural change
  2. Identification and effective legacy management
  3. Safe prioritised removal and effective waste management
  4. International collaboration and leadership.

The Asbestos Plan supports Victoria’s implementation of the NSP, specifically in the delivery of Priority 3 and the actions and target related to asbestos disposal.

The Asbestos Safety and Eradication Agency (ASEA) coordinates the implementation of the NSP and supports jurisdictions in meeting the national targets. This work includes developing an optimal framework for asbestos waste management in Australia in consultation with states and territories. As this framework evolves, SV will work with ASEA to align Victoria’s asbestos disposal system with relevant recommendations, where feasible.

### Victorian Asbestos Eradication Agency

The Victorian Asbestos Eradication Agency (**VAEA**) was established in 2016 to:

* prioritise and plan for the removal of asbestos from government-owned buildings
* develop a risk-based schedule for the prioritised removal of asbestos from government-owned buildings
* report on the ongoing progress of asbestos removal from government-owned buildings.

The Asbestos Plan will support VAEA’s work by increasing access to appropriate disposal infrastructure.

### Latrobe Valley Asbestos Taskforce

Established by the Victorian Government in 2019, the Latrobe Valley Asbestos Taskforce (**Taskforce**) is reviewing how asbestos is managed in the Latrobe Valley.

The Latrobe Valley has a long history of asbestos-related issues and the community has a strong awareness of, and local concern about, the disposal and management of asbestos waste in their community. The Taskforce brings together government agencies, local councils, unions and community groups to:

* develop a clear understanding of community expectations about asbestos management and disposal in the Latrobe Valley
* design a plan for managing asbestos at all Latrobe Valley sites and locations
* enquire into and report to government on current asbestos waste handling processes and safety practices within the public and private sector
* raise awareness of asbestos-related risks to change behaviour (with a priority focus on apprentices and home renovators).

The Asbestos Plan will support this work by improving Victorian community access to the asbestos disposal system both in the Latrobe Valley and elsewhere. We will also investigate opportunities to work with the Taskforce and build their learnings into the implementation of the Asbestos Plan.

1. Asbestos waste in Victoria
   1. What is asbestos?

Asbestos is the name given to a group of naturally occurring mineral fibres which were used extensively in the manufacture of many products such as tiles, cement pipes and insulation among others. Asbestos was used because of the versatility, strength, fire resistance and insulating properties of the fibres. Australian homes built or renovated before1990 have a good chance of containing asbestos (ASEA). Asbestos is also present in other commercial and public buildings and infrastructure.

Asbestos management is a legacy issue. From the end of 2003, a total ban was put in place on the manufacture, supply, use, reuse, import, transport, storage and sale of all forms of asbestos.

* 1. Risks to human health

Inhaling asbestos fibres is associated with several diseases including pleural disease, asbestosis, lung cancer and mesothelioma. An estimated 4,152 deaths in Australia in 2015 were caused by asbestos-related diseases (ASEA 2018). In addition to the lost lives, these diseases lead to high economic costs including health system expenditure, productivity losses and lost quality of life. The only way to prevent asbestos-related diseases is to eliminate the risk of exposure.

Currently, there is no treatment to decrease the hazardous aspects of asbestos waste. Until effective technologies are viable, these wastes are best managed through their final disposal at specifically designed landfills, licensed by EPA.

* 1. The impact of mismanaging asbestos waste

When not managed properly, Asbestos waste negatively impacts human heath, the environment, the community and the economy. Mismanaged asbestos contaminates both public and private land and waterways, exposes individuals to health risks, and represents a clean-up cost to landowners and government, who also face potential costs associated with the health system.

Mismanagement typically includes activities such as:

* asbestos being illegally dumped on public and private land
* asbestos being buried onsite
* poorly wrapped and sealed asbestos being taken to licensed landfills
* asbestos being hidden in other loads of waste being disposed of at landfills or at transfer stations/resource recovery centres.
  1. Asbestos waste disposal in Victoria

By weight, asbestos is one of the largest hazardous waste streams in Victoria. In 2019–20, it made up about eight per cent of hazardous material disposed of at licensed landfills, with an estimated 178,000 tonnes of asbestos-containing materials disposed of at landfill (SV 2020). Lots of wrapped asbestos disposed of directly by household removalists is not formally captured via Victoria’s waste data tracking system. Our research suggests this is a relatively small fraction, with most asbestos entering landfills as a contaminant in soil or from commercial removalists.[[4]](#footnote-5)

Asbestos removal needs special controls and regulatory requirements to reduce the risk of exposure, including wrapping and sealing at the point of removal for transport to its end fate at landfill (EPA 2017). Asbestos waste has two classifications for disposal purposes.

**Domestic asbestos waste**

* Has been removed, wrapped and sealed and transported by a household removalist to an appropriately licensed or permitted facility for disposal.
* Small amounts can be transported without EPA Waste Transport Certificates or transport permits.

**Commercial asbestos waste**

* Has been removed, wrapped and sealed and transported by a commercial removalist to an appropriately licensed of permitted facility for disposal.
* Transport for disposal is tracked via EPA Waste Transport Certificates under the code N220.

Victoria currently has 26 landfills licensed to accept asbestos, as summarised in Table 1 and shown in Figure 1. Of these, 13 are licensed to accept both domestic and commercial asbestos waste, eight to accept domestic only and five commercial only. Five are licensed to accept asbestos but currently do not.

Table : Asbestos-licensed landfills in Victoria as at December 2020

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of licence** | **Licensed landfills (no.)** | **Landfills licensed, but not accepting, asbestos (no.)** | **Total landfills accepting asbestos (no.)** |
| Domestic asbestos only | 8 | 1 | 7 |
| Commercial asbestos only | 5 | 0 | 5 |
| Commercial and domestic asbestos | 13 | 4 | 9 |
| **Total** | **26** | **5** | **21** |

Source: Various sources including EPA’s Victorian Landfill Register

Note: One resource recovery centre currently accepts small quantities of domestic asbestos waste for disposal at landfill.

Map showing landfills licensed to accept asbestos in Victoria. colour coding is used to display different license types - Red for Commercial, Green for Domestic and Yellow for Commercial and Domestic

**Figure 1: Landfills licensed to accept asbestos in Victoria as at December 2020**

1. What is the problem?

Access to convenient asbestos disposal options is limited for some Victorians, and is a particular issue for regional communities. Victoria has 43 population centres with more than 5,000 people. Based on our research, ten of these centres do not have access within a 60-minute drive to licensed landfills that currently accept commercial and/or domestic asbestos waste[[5]](#footnote-6).

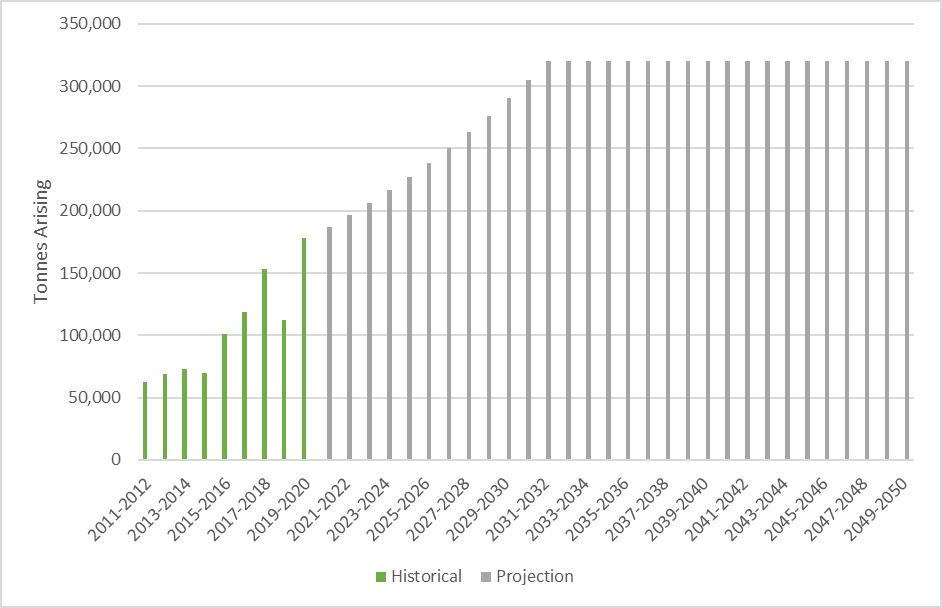
Over time, as landfills close, more Victorians (including licensed removalists) in both regional and metropolitan areas will need to travel further to dispose of asbestos safely and legally.

Lack of convenient disposal options, within a reasonable distance and travel time, are linked to illegal dumping and mismanagement (ASEA 2016). Anecdotally, long drive times also increase transportation costs for both commercial and household removalists.

* 1. Why do we need to expand the current system?

### Asbestos volumes are expected to grow

The arising[[6]](#footnote-7) of asbestos waste in Victoria is increasing over time. Figure 2 shows trends in asbestos arisings from 2011–12 to 2019–20 (shown in green), and projections from 2021 to 2050 (in grey).



**Figure 2: Asbestos arisings trends (2011–12 to 2019–20) and projections (2020–21 to 2049–50) (Source: SV 2020)**

We will most likely continue to need asbestos disposal sites for at least the next 30 years as waste arising in Victoria will increase as asbestos in building and housing stock is removed. This plan is focused on meeting needs during the next 10 years.

The large increase from 2016 can be explained by the increased health and safety focus in building and demolition practices, as well as the government commitment to remove asbestos from schools and other government buildings. Flows are projected to plateau in about 15 years as stocks of asbestos being removed from buildings flatten (SV 2019).

### Access to disposal options are limited and will become more limited

Currently, a restricted number of landfills are licensed to accept commercial and/or domestic asbestos waste (see Figure 1). Some landfills licensed to accept asbestos do not currently do so, due to concerns around risk management and costs, or they only accept it from residents in their immediate local government area (SV 2017 and Goulburn Valley WRRG 2017).

Based on SV’s preliminary research into planned closures of Victorian landfills, the number of landfills licensed to receive asbestos is projected to decline from 26 to 18 in the next ten years. In the next 30 years, it is projected to drop to seven landfills. Landfill closure over time will increase drive times to asbestos disposal options. In regional Victoria, by 2030 an estimated 50 per cent of the population will be located more than 60 minutes’ drive from a landfill accepting commercial asbestos waste and 30 per cent from a landfill accepting domestic asbestos waste. Drive times will also increase in metropolitan Melbourne by 2030 with nearly an estimated 20 per cent of the population located more than 60 minutes’ drive from a landfill accepting commercial asbestos waste.[[7]](#footnote-8)

The Asbestos Plan will consider the impact of likely landfill closures in the next 10 years on accessibility for asbestos disposal, but will not address needs beyond 10 years. Infrastructure needs beyond 10 years will be considered in future VRIPs.

* 1. What are the challenges for expanding the system?

The following issues were identified and tested with stakeholders during consultation. They were considered when developing the Asbestos Plan goals and actions and will be addressed as needed to enable the expansion of Victoria’s asbestos disposal management system.

**Issue 1: Access to, or cost of, insurance may impact on preparedness to establish asbestos transfer sites or accept asbestos at licensed landfills**

Some local government operated landfills reported difficulty sourcing insurance to cover asbestos-related claims. Most public liability insurance policies exclude asbestos, potentially due to the residual liability that can last for many years, clean-up costs and perceived high-risk approach taken for asbestos.

Environmental insurance such as Environmental Impairment Liability Insurance can be used as an alternative to address this asbestos exclusion. However, additional insurance typically comes at a higher cost. Anecdotally, this may be contributing to some landfills increasing their gate fees or prohibiting staff to handle loads, even when properly wrapped and sealed. Further, insurance costs may be a barrier to other suitable landfills seeking a licence to accept asbestos.

Perception of the risks posed by asbestos may be more influenced by the potential harm it can cause when mismanaged rather than the actual risk when properly managed.

**Issue 2: Regulatory barriers may make establishing new asbestos transfer sites difficult**

Regulatory requirements, including limits on how long asbestos can be stored at a facility before disposal at landfill, and volumes that can be accepted, may present cost and timing challenges to the roll out of asbestos transfer sites.

**Issue 3: Sites receiving asbestos may not have consistent and appropriate procedures to facilitate safe receival, management and disposal of asbestos**

Poor management practices, inappropriate infrastructure and lack of standard operating procedures for receiving and disposing of asbestos could expose staff and visitors to unnecessary risks.

Existing guidance and standards for managing waste asbestos are distributed across multiple documents and sources and are not relevant to all types of sites that could potentially receive asbestos.

**Issue 4: Asbestos loads entering sites may not be appropriately packaged**

It is challenging to ensure that all asbestos entering facilities has been properly wrapped and sealed by removalists. If the site operator rejects the load, it potentially increases the risk of illegal dumping, creating an ongoing public health risk and clean-up cost. Accepting the load could increase the risk of exposure to staff.

**Issue 5: Asbestos can illegally enter sites**

Operators report that unwrapped asbestos is improperly and illegally entering landfills and resource recovery centres with staff only realising after its disposal. Asbestos may be hidden in loads of other waste either deliberately or due to lack of community awareness about proper disposal requirements.

**Issue 6: There are costs associated with the legal and illegal disposal of asbestos**

The cost of asbestos disposal is a potential barrier to efficient and safe disposal. Research by the New South Wales Environment Protection Authority found that cost of disposal is a key reason why people illegally dump asbestos waste (NSW EPA 2019). The cost of proper and legal disposal is the gate fee charged per tonne by licensed facility owners/operators and covers:

* the levy for wrapped asbestos – this fee is set by each Australian state or territory
* management costs and profit margin.

Gate fees for asbestos disposal vary depending on the receiving landfill and the type, volume and condition of the material (SV November 2019). Anecdotal evidence suggests the significant difference in gate fees results in asbestos being transported around Victoria and interstate to get the lowest disposal cost.

Illegally dumped asbestos increases the risk of exposure to the public and results in substantial clean-up costs for councils, public land managers and private landowners. In 2012, Victorian councils spent $6 million cleaning up illegally dumped asbestos (ASEA 2016).

**Issue 7: Impact of asbestos data gaps and data limitations on longer term infrastructure planning**

Planning for safe and accessible infrastructure for disposal of asbestos relies on accurate data and information about how much waste is entering the system, and in what way, to identify any issues and future needs. Restrictive waste codes can create challenges with data analysis and understanding the source and movement of asbestos. Datasets relating to the potential generation of asbestos waste from some types of building stock could be better integrated with SV’s waste data system to improve accuracy of data projections.

**Issue 8: Asbestos arisings from unexpected events need expanded landfill capacity at short notice and reactive solutions may have other impacts**

Events such as natural disasters, including fire, floods and storms, unexpected landfill closures or unexpected access restrictions can result in significant volumes of asbestos with no management pathway. In many instances, this can occur in a volatile, fast-moving context and the need for timely and accessible disposal options may result in suboptimal solutions. With the frequency and severity of natural disasters, such as bushfires, expected to increase due to climate change (DELWP 2019), the risk of this occurring is likely to increase.

Solutions for different scenarios, which can be deployed as needed, require coordination across multiple layers of government, jurisdictions, industry and the community. However, Victoria currently lacks a coordinated contingency plan for asbestos disposal options in the case of unforeseen situations like natural disasters or unexpected landfill closures.

1. What we want to achieve
   1. Aim

The aim of the Asbestos Plan is to ensure Victoria has the infrastructure and supporting systems to enable safe management and disposal of waste asbestos and to meet future disposal needs.

* 1. Goals

### Goal 1: Asbestos disposal is easier

The current asbestos disposal system will be improved to provide greater access to disposal options.

An integrated network will be established composed of existing licensed landfills and new asbestos transfer sites to support safe and legal disposal of wrapped and sealed asbestos waste. The expanded system will improve access for Victorians by providing commercial and/or domestic asbestos disposal options within a 60 minute or less drive time where feasible.

Landfills already licensed to accept asbestos are an integral part of the network. Opportunities to expand access to both commercial and household removalists will be investigated with landfill owners and operators. Expanding EPA licence conditions at other suitable licensed landfills, which cannot currently receive asbestos, will also be explored with stakeholders where a geographic need has been identified.

The asbestos transfer sites will accept wrapped and sealed asbestos, which will be consolidated in appropriate infrastructure for a short time before being collected by a licensed waste transporter and taken to a licensed landfill for its end fate.

These sites will be located at existing waste facilities such as transfer stations/resource recovery centres or other suitable locations. Potential sites will be determined with local government, in consultation with waste facility owners/operators, EPA, WRRGs and communities as needed.

The infrastructure and systems supporting the roll out of the network will be designed to maximise operational costs efficiencies without compromising safety.

### Goal 2: Asbestos disposal is safe

Onsite management of waste asbestos at asbestos transfer sites and transportation for disposal at licensed landfills will be safe and minimise risks to staff, service providers, customers and the environment.

Appropriate infrastructure, guidance, standard operating procedures, training, communication materials and other resources will support best practice management. Guidance will include managing different scenarios at sites such as dealing with asbestos loads that may include non-compliant packaging.

Guidance, training and other resources will be broadened for asbestos receival and management at licensed landfills if a need is identified by operators who elect to accept asbestos as part of the system. However, the EPA’s Best Practice Environmental Management landfill guide (*Siting, Design, Operation and Rehabilitation of Landfills,* 2015) remains the primary guidance document for licensed landfills.

### Goal 3: The asbestos disposal system is sustainable and able to meet changing needs.

A funding and support model will be developed for government consideration to enable ongoing access to the asbestos disposal system beyond the three-year implementation phase of this Asbestos Plan. The model will consider:

* the costs of asbestos disposal
* sustainable funding opportunities, for example, reinvesting the asbestos landfill levy to support ongoing implementation
* supporting site operators and those transporting asbestos to comply with regulations
* mechanisms needed for ongoing compliance and effectiveness
* alignment with EPA’s new Waste Crime Prevention Directorate and the existing Illegal Waste Disposal Program to ensure integrated solutions to achieve the best outcomes
* alternative asbestos disposal options for remote communities where a 60-minute drive time is not practical.

The asbestos disposal system will be supported by the best available data to enable ongoing monitoring, future planning and reporting. This includes identifying changing volumes and infrastructure requirements over time.

Unexpected asbestos waste arising from natural disasters and other unforeseen events will be appropriately managed through contingency plans.

* 1. How we will do this

| **GOALS** | **Our actions** | **When**  (financial year) | **Outcome** |
| --- | --- | --- | --- |
| **Goal 1: Asbestos disposal is easier** | | | | |
| **A. Confirm sites, infrastructure and transport needs and options**   * Consult with licensed landfill owners on potential site accessibility for commercial and household removalists to ensure their effective role in the asbestos disposal network. Support owners with licence amendment processes as needed. * Map existing disposal facilities against population, confirm geographic gaps and liaise with operators, councils and WRRGs to identify potential asbestos transfer sites, considering location and access constraints. * Identify infrastructure and transport options that are cost-effective, meet regulatory and operator requirements and community expectations, assessed through multi-criteria analysis. * Understand insurance and regulatory barriers and facilitate solutions.   **B. Pilot infrastructure and transport options**   * Pilot option/s in one or more subregions1 to better understand costs and operator needs, test infrastructure and transport effectiveness, engage with community to identify potential concerns, identify any other unexpected issues and barriers with implementation and unidentified consequences for regulators. * Work with stakeholders to address key barriers, infrastructure and transport challenges and any issues and community concerns that arise through the pilot. * Develop a business case for roll out of preferred infrastructure and transport options.   **C. Roll out statewide program**   * Based on pilot analysis and business case, roll out the preferred infrastructure and transport option/s with stakeholders at confirmed sites through funding agreements, engaging with local communities as needed. * Ensure that new sites comply with OHS and environmental requirements at the point of commissioning. | | | 2020/21–2023/24 | *More Victorians will have access to a licensed landfill or asbestos transfer site within 60 minutes’ drive time 2* |

| **GOALS** | **Our actions** | **When**  (financial year) | **Outcome** |
| --- | --- | --- | --- |
| **Goal 2: Asbestos disposal is safe** | | | |
| **A. Develop and implement an operational support package**   * Consult with stakeholders on guidance, standards, compliance and training needs and review existing materials and resources. * Develop new materials as needed and collate existing information into the one package that includes guidance, standard operating procedures templates and other resources. This package will link, where relevant, to [asbestos.vic.gov.au](http://intranet/Docs/Projects/1235/Deliver/Draft%20Asbestos%20Disposal%20Management%20Plan/Asbestos.vic.gov.au)3 * Develop a training program for staff managing asbestos as sites are introduced to the integrated network.   **B. Develop and implement a communications support package**   * Develop communication resources to help councils and site operators inform their communities about the asbestos disposal network and how to safely use the sites located near them. Communications material will link, where relevant, to [asbestos.vic.gov.au](http://intranet/Docs/Projects/1235/Deliver/Draft%20Asbestos%20Disposal%20Management%20Plan/Asbestos.vic.gov.au) | | 2021/22–2022/23 | *Site operators will have the support, training and information to keep staff and users safe.*  *Commercial and household removalists will have clear information on how to access and safely use the asbestos disposal network.* |

| **GOALS** | | **Our actions** | **When**  (financial year) | | **Outcome** |
| --- | --- | --- | --- | --- | --- |
| **Goal 3: The asbestos disposal system is sustainable and able to meet changing needs** | | | | | |
| **A. Develop an ongoing funding and support model (for government consideration) to sustain the expanded asbestos disposal system**  Collaborate with stakeholders to identify a model to support the system in the long term   * Draw on outcomes from the pilot, preferred infrastructure and transport options and work to address any barriers * Investigate sustainable funding options and ongoing requirements to support compliance * Identify disposal options for communities with limited access to the disposal system.   **B. Establish monitoring and evaluation plan**   * Measure and communicate the effectiveness and impact of the Asbestos Plan * Inform the model to sustain the asbestos disposal system over the longer term.   **C. Ensure adequate data supports planning and monitoring beyond the three years of the Asbestos Plan**   * Review existing asbestos datasets with stakeholders * Provide recommendations to address needs for data and analysis.   **D. Ensure that asbestos transfer site operators establish site-specific contingency plans for asbestos**  **E. Contribute to contingency planning at a state level**   * Include asbestos disposal in Victoria’s Risk and Contingency Framework (being developed in parallel with the VRIP). | | | 2021/22–2022/23 | *A model is developed to support the asbestos disposal system.* |
| 2022/23 | *An evidence-based monitoring and response system is established to ensure the asbestos disposal system is safe, efficient and effective.* |
| *Contingency plans are in place for emergency events and other changing circumstances such as unexpected landfill closures.* |

Notes

[1] Plans for a pilot will align with current programs and recent investigations into asbestos disposal options for communities. Subregions are defined as drive-time catchment areas that may cross local government areas.

[2] The increase in percentage of Victorians who have reasonable access to the system will be reported as the implementation of the Asbestos Plan progresses. Consideration will be given to where reasonable access has been maintained if existing landfills are closing and where increased access has been provided to new communities.

[3] Asbestos.vic.gov.au contains links to the latest information, guidance, forms and compliance codes for employers, licensed removalists, builders and tradespeople, council staff and members of the public to help with safely managing asbestos.

* 1. Principles

The following principles will guide our work:

1. Risks of harm to human health and the environment will be minimised so far as reasonably practicable.
2. Existing licensed landfills will be prioritised in the network for disposal where appropriate and in agreement with owners/operators.
3. Asbestos short-term storage infrastructure solutions and associated transport systems will be cost-effective and meet regulatory requirements and stakeholder needs and expectations.
4. Operators will be supported throughout implementation.
5. Victorians will have reasonable access to asbestos disposal options where feasible.

‘Reasonable’ access is proposed to be 60 minutes or less drive time. Most Victorians will not frequently need access to asbestos disposal points, and a drive time of 60 minutes provides a reasonable and feasible option which is expected to reduce transport costs and illegal dumping.

The preferred approach to asbestos removal from homes is by a licensed removalist. Providing disposal options within an hour is expected to enable this service to be expanded to more Victorians. However, asbestos transfer sites are not expected to accommodate the disposal of significant volumes.

Goal 3 includes investigating disposal options for communities who do not have ‘reasonable’ access.

* 1. Delivery and evaluation of the Asbestos Plan

The Asbestos Plan will inform SV’s delivery until the end of 2023. The program delivery and the effectiveness of the Asbestos Plan will then be evaluated. Delivery will be guidedby an implementation plan and supported by a working group consisting of DELWP, EPA, Municipal Association of Victoria, SV, VAEA, WRRGs and WorkSafe Victoria. We will develop advisory groups as needed to work through specific issues.

The Asbestos Plan includes developing a sustainable model for ongoing operation of the asbestos disposal system beyond 2023 (as per Goal 3).

* 1. Who we will work with

Table 2 lists the roles and responsibilities of different stakeholders that will support or inform delivery of the Asbestos Plan. Stakeholder engagement and communications will be core to our implementation and an engagement plan will guide how and when we work with different stakeholders.

Table : Key stakeholder groups

| **Stakeholder** | **Relevant function/s** | **Role in implementing the Asbestos Plan** |
| --- | --- | --- |
| DELWP | Set policy and oversees implementation, including Recycling Victoria and leads legislative reform. | Inform and support developing a model to enable a sustainable asbestos disposal system. |
| EPA | Regulate the classification, storage, transport and disposal of asbestos waste under the *Environment Protection Act 2017* | Inform and support implementation by ensuring that the expanded asbestos disposal system complies with regulations, standards and codes.  Support alignment with EPA’s Waste Crime Prevention Directorate and the Illegal Waste Disposal Program. |
| WorkSafe Victoria | Responsible for health, safety and welfare in the workplace under the *Occupational Health and Safety Act 2004.*  Issue and control licences for all asbestos removalists and demolition contractors. | Inform and support implementation by ensuring that the expanded asbestos disposal system complies with regulations, standards and codes.  Support engagement with commercial removalists. |
| WRRGs | Support statewide planning and lead planning and implementation at the regional level, including working with local governments and industry. | Support SV engagement with stakeholders and help identify potential asbestos transfer sites and infrastructure and transport needs. |
| VAEA | Provide Victoria with a long-term plan for the removal of asbestos from government-owned buildings. | Inform and support implementation as a member of the working group. |
| Local government | May own and operate landfills and waste transfer stations/resource recovery centres  Give information to communities on waste services in their municipality and beyond. | Confirm role of licensed landfills in integrated network.  Help identify potential asbestos transfer sites and infrastructure and transport needs and – pending need – establish sites and participate in the system.  Inform their communities on asbestos disposal options. |
| Municipal Association of Victoria (MAV) | Advocate for local governments. | Inform and support implementation as a member of the working group. |
| Latrobe Valley Asbestos Taskforce | Review asbestos management in the Latrobe Valley and make recommendations to government. | Share information and data on asbestos disposal. Support/align implementation activities where relevant. |
| Waste industry (private waste facility owners/operators, transporters, peak bodies and unions) | Private landfill operators may be licensed to accept asbestos or have the potential to accept asbestos with appropriate licence condition changes.  Privately-owned waste transfer stations/resource recovery centres may be suitable asbestos transfer sites.  Waste transporters collect and move waste materials between facilities.  Peak bodies and unions advocate for their members (private operators and local government). | Work with SV and support implementation as needed to:   * integrate relevant facilities and transport services into the expanded asbestos disposal system * meet the safety of workers. |
| Commercial and household removalists | Key users of the asbestos disposal system. | Users of system. May contribute to identifying suitable sites and issues. |
| Community | Communities may live near potential asbestos transfer sites. | Give feedback as needed to ensure potential concerns are considered. |

1. Keep in touch

SV will develop an implementation plan to support delivery of the Asbestos Plan with work commencing in 2021. We will publish updates on the delivery of the Asbestos Plan every six months at [sustainability.vic.gov.au](https://www.sustainability.vic.gov.au/)

If you want to know more about the Asbestos Plan, contact [asbestosdisposalplan-enquiries@sustainability.vic.gov.au](mailto:asbestosdisposalplan-enquiries@sustainability.vic.gov.au)

1. References

ASEA (Asbestos Safety and Eradication Agency) (16 March 2016) [*Illegal asbestos dumping: Review of issues and initiatives – final discussion paper*](https://www.asbestossafety.gov.au/research-publications/illegal-asbestos-dumping-review-issues-and-initiatives-discussion-paper), ASEA, Australian Government, accessed 21 November 2020.

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SV (November 2019) *Asbestos Disposal Management Plan Discussion Paper*, SV, Victorian Government, Melbourne.

SV (December 2020) *Hazardous Waste Projection Model – waste code N220* [commercial-in-confidence, unpublished] internal dataset.

1. Asbestos Disposal Management Plan updated in August 2021 to incorporate extended timeline for its implementation from two to three years. All references to the EPA Act have been updated to reflect the new EPA Act 2017 effective 1 July 2021. [↑](#footnote-ref-2)
2. Includes resources such as guidance, templates for standard operating procedures, training and communication materials. [↑](#footnote-ref-3)
3. Note that there are additional privately-owned landfills that manage their own asbestos and are not included in statewide infrastructure planning. [↑](#footnote-ref-4)
4. A desktop review of differences between EPA’s Waste Transport Certificates (i.e. asbestos not disposed of by household removalists) and landfill levy (all disposed asbestos) data over a 12-year period demonstrates some variation, for which there are likely several causes. This data is expected to improve with better use of waste codes and with data collected through the work of the Asbestos Plan. [↑](#footnote-ref-5)
5. 5 Population figures have been based on 2016 ABS census data [↑](#footnote-ref-6)
6. Wastes are said to ‘arise’ when they cause demand for storage, treatment or disposal infrastructure. [↑](#footnote-ref-7)
7. Population figures have been based on 2016 ABS census data [↑](#footnote-ref-8)