



20 June 2016

Mr Liam O'Dwyer
Asbestos Safety and Eradication Agency
GPO Box 9880
SYDNEY NSW 2001

**RE: Project to strengthen asbestos-related training materials in the
utilities sector – Request for endorsement of draft unit of competency**

Dear Mr O'Dwyer,

I refer to the letter sent to Mr Wayne Cullen as the Energy Network's Association's (ENA) representative on the Asbestos Safety and Eradication Agency Technical Advisory Group on 6 June 2016, in regard to the request for endorsement for the proposed draft unit of competency to strengthen asbestos-related training.

By the way of background, the ENA is the peak national body representing gas and electricity transmission and distribution businesses throughout Australia. A safe, reliable and affordable electricity supply is the cornerstone of Australia's economy and of modern society.

Significant effort is required every year to maintain assets and provide services to customers which ensure the safe and reliable operation of Australia's electricity transmission and distribution networks. This work must be undertaken in a manner which ensures adequate safety for electricity networks employees and the public. The ENA have been a strong supporter of the Asbestos Safety and Eradication Agency's initiatives to help ensure that safety is maintained for our workforce and the public, and that it is undertaken in a nationally consistent manner, including a consistent approach to the provision of an Asbestos Awareness course/Unit of Competency that is tailored to the utility sector.

In relation to your request for endorsement of the proposed unit of competency, ENA through our member organisations have identified a number of areas of concern relating to the proposal in question that were not agreed to by ENA member representatives at the DACUM meeting referred to in your letter.

Training management representatives from our member companies have reviewed the draft unit of competency and have identified that the proposed requirement for assessment of the unit of competency to contain in-person 'face to face' role playing and simulation of scenarios where workers may encounter asbestos during work activities is unnecessary and unsuitable for the purpose of the unit of competency. This extends to the impracticable requirement for a physical demonstration of how to change into, fit, decontaminate, change out of, and dispose of personal protective equipment.

ENA member companies believe that these requirements are excessive and unsuitable for assessment of learning of a unit of competency intended to provide workers with ability to recognise and respond to asbestos risk; the unit of competency is not intended to provide workers with the skills and

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knowledge required to undertake tasks involving asbestos containing materials (such as handling and disposal).

The ENA recommends that the proposed unit of competency be allowed to be delivered through an internet-based 'E-Learning' platform that does not require the in-person 'face to face' practical assessments as noted here. This flexibility in assessment delivery is required by our member companies to ensure practicable and affordable training of the industry's geographically dispersed workforce, and is how similar training is delivered.

For the reasons outlined above, the Energy Network Association is unable to provide endorsement for the proposed Unit of Competency in its current format and content.

I look forward to and support a more practicable national asbestos awareness course which contains assessment methods appropriate to the course intent and is able to be delivered in a format suitable for our industry's geographically dispersed workforce.

If you have any questions or wish to discuss this matter further, please contact Wayne Cullen on 07 4432 8173 or wayne.cullen@ergon.com.au (cc. Heath Frewin at hfrewin@ena.asn.au).

Sincerely,



John Bradley

Chief Executive Officer