Contractor Asbestos Management Guide
Guide
HSWE-GUI-51-002-GBL-ALL

Table of Contents

1.0 INTRODUCTION

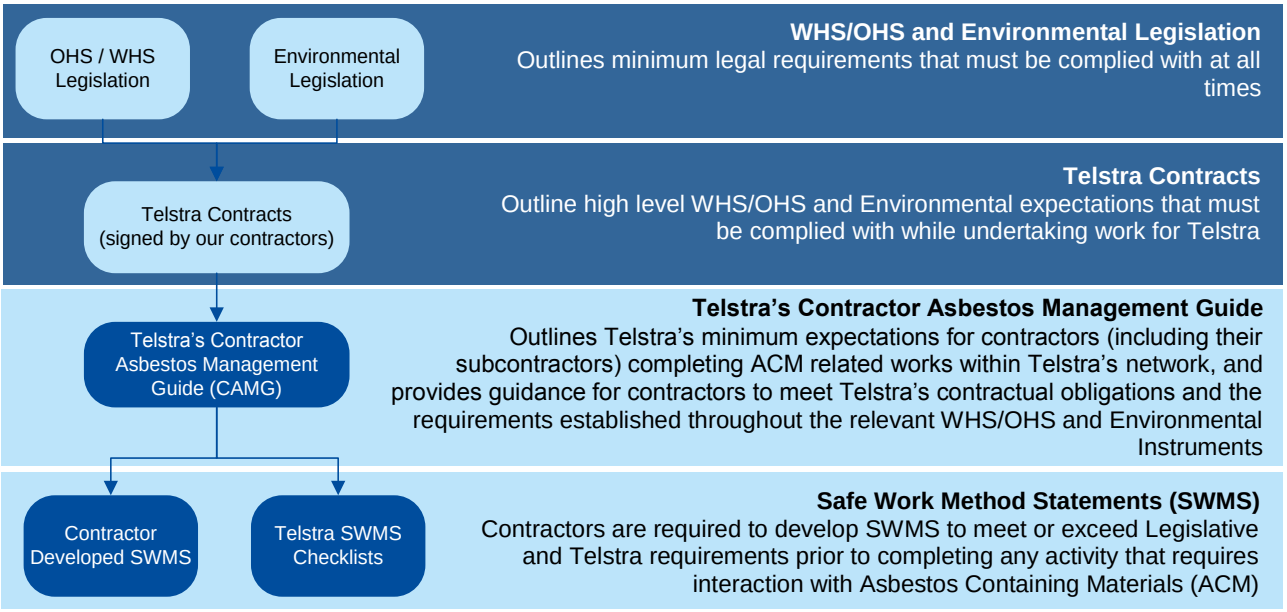
This document provides Telstra contractors with a set of minimum requirements and expectations when undertaking work where asbestos is present or likely to be present during works associated with Telstra's network.

Contractors completing asbestos related works or accessing Telstra-owned infrastructure are to meet or exceed of this Contractor Asbestos Management Guide (ASA-3148), and comply with all applicable workplace health and safety (WHS) legislation and applicable Codes of Practice. Telstra requires its contractors to confirm that all of their workers (direct or subcontracted) comply with the requirements of this document.

This document is divided into the following key areas:

- Asbestos Containing Material (ACM) activities and SWMS requirements;
- Non-friable asbestos removal;
  - Licensing and competency requirements
  - Clearance certificate requirements
  - Statutory notification requirements
- Friable asbestos removal;
- Asbestos transport, storage and disposal requirements and soil management requirements; and
- Guidance on the prevalence of asbestos containing pits and ducts in Telstra's network.

1.1 Document Hierarchy



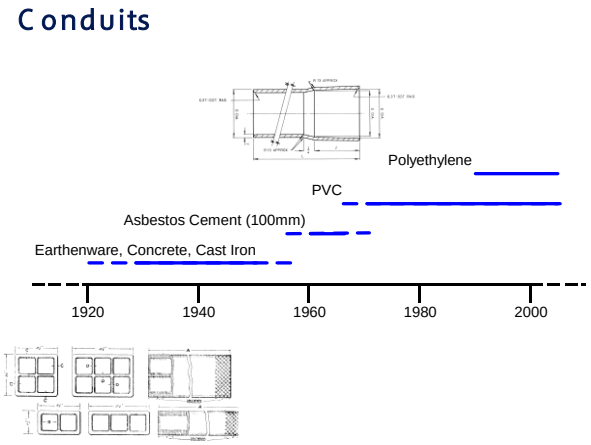
2.0 PRESENCE OF ASBESTOS

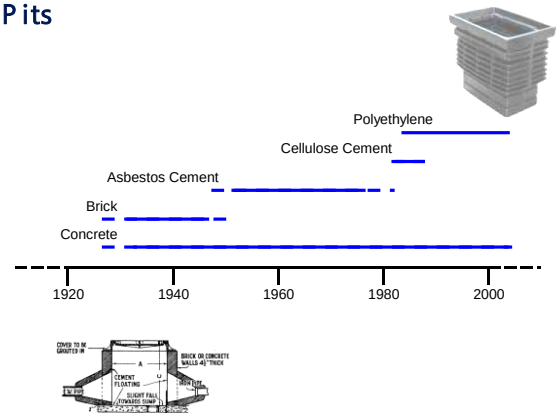
Whenever there is uncertainty about the presence of ACM in the composition of materials about to be removed or disturbed, always presume it contains asbestos. Prior to commencing any asbestos related works on Telstra's network, workers are to consider alternative construction methods that will avoid asbestos disturbance.

2.1 Works in Telstra's Access Network

Telstra requires Contractors to treat all non-plastic pits and pipes/conduits/ducts as potentially containing asbestos, and apply the processes outlined in this document accordingly.

Older pits/conduits/ducts may contain fibre cement materials with fibres made up of either asbestos or cellulose. Two timelines demonstrate when these materials were placed into the Telstra network.





Many fibre cement pits are likely to contain ACM and as such, Telstra applies the presumptive test that all non-plastic pits and pipes/conduits/ducts are to be treated as ACM. Older suburbs adjacent to modern CBD areas are likely to have a larger number of pits and pipe/conduit/ducts that are likely to contain ACM.

All ground breaking activity needs to comply with the requirements set out in this document.

2.2 Works in Telstra's Equipment Building Network

Contractors accessing Telstra's equipment building network in accordance with our access requirements are to participate in the WINS (Working in Network Sites) process, which includes specific requirements to provide documentation of proposed works to the relevant Facilities Manager. This document does not replace any part of the requirements of the WINS process.

Telstra requires Contractors to treat all vinyl floor tiles in Telstra's equipment building network as potentially containing asbestos, and apply the processes outlined in this document accordingly.

3.0 SWMS REQUIREMENTS FOR ACM ACTIVITIES

Prior to the commencement of any ACM modification or removal works, alternatives to the disturbance or modification of ACM products must always be considered as a first option. Only after ruling out these alternatives on the grounds of reasonable practicability should modification works be considered.

3.1 Key ACM Related Activities

The WHS Regulations identify works that disturb or are likely to disturb asbestos as being "High Risk Construction Work", and therefore require the development and implementation of a Safe Work Method Statement (SWMS).

Contractors that are not operating under Telstra's direct supervision are to provide and work to SWMS that meet or exceed relevant WHS/OHS Legislative requirements, have been reviewed by an occupational hygienist, and meet the requirements of Telstra's ACM SWMS Review Checklists.

Specifically, Telstra has identified the following key activities that are likely to require the disturbance of asbestos within our network infrastructure (key ACM activities):

- ACM pit removal;
- ACM pit break-in;
- ACM duct removal and repair; and
- Make safe damaged ACM pits.

No contractor shall be permitted to engage in key ACM activities without going through a Telstra ACM WPA and COE Endorsement Process (as per section 6.2 "ACM Workplace Assessment").

If a contractor is performing any of the key ACM activities, the contractor must develop and work to SWMS that meet the requirements of the SWMS checklist and meet the minimum controls documented within the sample SWMS provided.

Where a contractor SWMS does not meet the minimum requirements of the SWMS Checklist, the contractor will be advised to review their SWMS taking the points not addressed into consideration prior to the commencement of works.

For additional information refer to the following:

- Appendix 2 – Contractor SWMS Checklist
- Appendix 3 – Sample SWMSs

NOTE: Contractors are to take their own requirements and expertise into consideration when viewing the sample SWMS, and are not to solely rely on the documents as a substitute for creating their own SWMS.

3.2 Other ACM Related Activities

Where an activity requires the disturbance (or likely disturbance) of asbestos but falls outside of the key ACM activities (e.g. cutting ACM vinyl tiles in Telstra Exchange or collection of ACM debris), the contractor must notify Telstra (via their Telstra contact) of their intent to complete the task, and provide a SWMS for the proposed activity that identifies the following:

- The training and competency required to complete the activity;
- Site setup requirements (including traffic management and location of underground assets – if applicable);
- Processes to prevent the creation / spread of airborne asbestos fibres;
- The tools to be used to complete the activity (no power tools are to be used directly on ACM without authorisation from Telstra's HSWE Operations Team following detailed risk assessment and consultation with an occupational hygienist);
- Decontamination processes / requirements;
- Potential contaminated soil identification and handling requirements;
- Transport and disposal requirements for ACM waste and excess soil (where applicable); and
- Details of worker induction into the SWMS.

Works are not to commence until the relevant Contract Manager, a member of the HSWE Operations Team or one of their delegates completes a review of the SWMS using the Contractor Asbestos Management SWMS Checklist. Your Telstra contact will notify you of the progress of the review.

For additional information refer to the following:

- Appendix 2 – Contractor SWMS Checklist.

3.3 Prohibited Activities

The following activities are strictly prohibited, and are not be completed on Telstra infrastructure:

- Positive pressure roping (blowing) in ACM Ducts; and
- The use of grinding tools that may cause the release of airborne asbestos into the atmosphere.

4.0 FRIABLE ASBESTOS REMOVAL

Friable asbestos removal requires specialist training and equipment to complete, and is not be undertaken by those without the appropriate competency and equipment to do so.

If friable asbestos is encountered during any works within Telstra's network, works are to cease immediately and not continue until the following has occurred:

- Telstra is notified of the presence of the friable asbestos (via your Telstra contact);
- A Class A Licensed asbestos removalist is engaged to complete the removal work; and
- A Clearance Certificate is provided by a licensed asbestos assessor or equivalent depending on the State the work is being conducted.

5.0 TELSTRA PIT AND DUCT/CONDUIT REMEDIATION

Due to the prevalence of ACM pits and conduits within Telstra's Access Network, Telstra does not consider it to be reasonably practicable to simply remove Asbestos related infrastructure when it is encountered.

A risk based approach / assessment must be applied to determine the structural integrity of the infrastructure and determine whether asbestos related work is permissible (consistent with relevant Codes of Practice) or if removal is required. In short, ACM infrastructure will be removed where it presents as an unacceptable health hazard or where the proposed work will expedite the deterioration of the ACM.

5.1 ACM Related Work Assessment in Telstra's Access Network

Prior to commencing any asbestos related works in the Access Network, workers are to consider alternative construction methods to avoid asbestos disturbance.

Where no other alternatives have been identified, the following process must be followed:

- If the ACM pit/conduit/duct is deteriorated with extensive loose cement debris present or has lost its structural integrity:
  - the asbestos related work should not proceed (unless using a split conduit repair kit or pit collar replacement); and
  - the pit or conduit should be removed and replaced as soon as practicable by competent workers in accordance with section 6.0 of this document "Non-Friable Asbestos Removal"
- If the pit/conduit/duct has cracks or fractures that extend through its thickness and along its depth or length, then the following must be considered prior to commencing modification works:
  - Is it likely that modification works will accelerate deterioration of the ACM?
  - Is it likely that modification works will cause unacceptable health risk to others?

  If yes, the pit/conduit/duct is to be removed and replaced as soon as practicable by competent workers in accordance with section 6.0 of this document "Non-Friable Asbestos Removal"
- If the ACM pit/conduit/duct is free from damage or deterioration, modification works may be considered in accordance with section 6.0 of this document "Non-Friable Asbestos Removal"

6.0 NON-FRIABLE ASBESTOS REMOVAL

6.1 Licensing and Competency Requirements

Telstra requires that contractors completing activities that disturb or alter ACM be appropriately trained by a Registered Training Organisation (RTO) (www.training.gov.au) and competent to complete the works that they have been engaged to complete.

As a minimum, Telstra requires that contractor employees (including their subcontractors) completing ACM works hold the following minimum competencies (or approved equivalents) prior to commencing any ACM related activities:

- Remove Non-Friable Asbestos (CPCCDE3014A) (https://www.myskills.gov.au/courses/unit?Code=CPCCDE3014A)
- Work Safely in the Construction Industry (CPCCOHS1001A) (https://www.myskills.gov.au/courses/unit?Code=CPCCOHS1001A)

Further, for all ACM works, a supervisor who has completed the Supervise Asbestos Removal (CPCCBC4051A) (https://www.myskills.gov.au/courses/unit?Code=CPCCBC4051A) competency in addition to those nominated above, must be readily available at the worksite

6.1.1 Class B Asbestos Removalist Requirements

Telstra requires contractor companies completing non-friable ACM removal or disturbance to hold a Class B license for the removal of non-friable asbestos (or state/territory regulator approved equivalent) as a minimum.

Workers completing non-friable ACM removal or disturbance must be a direct employee of the Class B License Holder.

6.2 ACM Workplace Assessment (WPA) / Contractor Centre of Expertise (COE) Endorsement Process

Contractors undertaking Key ACM activities (listed in section 3.1 “Key ACM Related Activities”) within Telstra’s network are required to have successfully completed the WPA process and be Contractor COE endorsed prior to asbestos removal task commencement, as per the ACM WPA and Contractor COE Endorsement Process.

Contractors engaged to complete ‘key ACM activities’ as identified in this document are to:

- Only engage workers that have successfully completed the workplace assessment process;
- Only engage workers that have a current COE endorsement; and
- Not engage workers with a lapsed or ‘not endorsed’ COE status.

NOTE: Telstra will conduct periodic surveillance audits and inspections to verify the COE endorsement status of workers completing key ACM activities. Contracting companies found to be operating outside of the requirements above may be subject to significant contractual penalties.

6.3 Notification Requirements

Contractors completing ACM works are to:

- Notify the State/Territory based Workplace Safety Regulator in accordance with the WHS/OHS Regulations that apply to the State/Territory (e.g. 5 days before commencing licensed asbestos removal work in NSW, QLD, TAS, ACT, NT etc.); and
- If the contractor is required to provide notification in accordance with WHS/OHS Regulations, evidences of that notification must be provided to Telstra prior to commencement of works.

NOTE: where a contractor has established an agreement with a regulator that varies from the regulations, the contractor is to provide a copy of the completed agreement to the applicable Telstra Contract Manager.

6.3.1 Retention of Notification Records

Where a contractor has been required to notify the relevant regulator of their intent to complete non-friable asbestos removal works, the contractor is to maintain the records of the notification with the relevant project / work order documentation.

The records are to be kept for a minimum of 7 years, or as determined by the applicable WHS legislative requirements. Records must be made available to Telstra on request for audit and verification purposes.

6.4 Clearance Certificates

Where a ticket or scope of work requires the removal of more than 10m^2 of non-friable asbestos, a clearance inspection must be conducted by an independent competent person or licensed asbestos assessor (depending on the State in which the work is being conducted) for each work location that is part of the ticket / scope of work.

The person completing the inspection is to supply a Clearance Certificate for the ticket/scope of work once satisfied that non-friable asbestos is no longer present in the location.

NOTE: the Clearance Certificate is to identify all work areas assessed as part of the clearance inspection.

6.4.1 Retention of Clearance Certificates

Where a clearance certificate is required in accordance the contractor is to provide the applicable Telstra Contract / Project Manager with a copy of the certificate. The applicable Telstra Contract Manager or Project Manager is to maintain a copy of the clearance certificate with the project documentation.

Where work has been completed at a Telstra Network Building (e.g. Telstra Exchange) the applicable Property / Facilities Manager is also to be provided a copy of the clearance certificate to facilitate updating of the relevant Property Asbestos Register.

The contractor completing the works must also maintain a copy of the clearance certificate in accordance with the applicable WHS legislative requirements that apply to the contractor where the work is being performed.

6.5 Asbestos Control Plans

Asbestos Control Plans shall be developed prior to the completion of licenced asbestos removal work.

The Asbestos Control Plans shall include:

- details of how the asbestos removal will be carried out, including the method to be used and the tools, equipment and personal protective equipment to be used; and
- details of the asbestos to be removed, including the location, type and condition of the asbestos.

A Safe Work Method Statement may be used for this purpose provided that it details the information above.

6.6 Additional Requirements for Network Sites

In addition to the other requirements of section 6.0 “Non-Friable Asbestos Removal”, contractors working in Telstra Equipment Building sites must:

- Comply with Telstra’s access procedure for equipment buildings, including following the requirements of the Working in Network Sites (WINS) 013731 procedure and the associated WINS training requirements prior to beginning any ACM works in any Telstra Equipment Building;
- Comply with the requirements of the Asbestos Management – Telstra Network Buildings Document (007338 C8-11); and
- Access the Asbestos Management Plan (if available) and associated asbestos register (for the building being worked in) prior to any disturbance activity.

6.7 Telstra Network Site Asbestos Register

Telstra maintains electronic asbestos registers for its network sites via online platform Lupin System.

The asbestos register for the sites must be reviewed prior to any work that could potentially disturb asbestos e.g. work in a ceiling space, penetrating a surface. Any work that may disturb, change or remove asbestos from Telstra Network Sites must be notified to the Network Site Facility Manager. Updates or changes to the asbestos register are to be notified to the Network Site Facility Manager.

Lupin System Login information:

- Website: http://apps.lupinsys.com
- Username: Telstra@Lupinsys
- Password: TelstraLupinsys

Telstra Network Site ACM registers can be accessed via the Telstra Network Sites specific QR codes that are used for signing in to the facility on entry.

6.8 Surface Penetration in Non-Telstra Controlled Premises

In the cases of residential and commercial customer premises, workers must not penetrate surfaces (e.g. walls, floors, roofs, ceilings etc.) where there are indicators that ACM is present (unless an exemption is provided by Telstra’s CEO or Board).

Where surface penetration is required (e.g. drilling holes into walls or ceilings), the Asbestos register for the work location is to be obtained from the building/property/facility manager prior to commencing work. The register should be used to assist in determining the likely presence of Asbestos.

The asbestos register should not be relied upon in isolation. Other indicators such as the age of the building, types of materials used and the location that works are taking place should also be considered.

In residential premises, the property owner should also be consulted prior to commencement of works to assist in determining the likely presence of Asbestos.

In circumstances where there is any doubt regarding the presence of Asbestos, surface penetration should not commence. The relevant Telstra contract manager should be contacted to determine an appropriate course of action which may include testing by an occupational hygienist.

NOTE: ACM disturbance inside a residential or commercial customer’s premises is not permitted unless working under a Telstra CEO Leadership Team approved exemption (e.g. NBN FTTP Trial).

7.0 RESPIRATORY PROTECTIVE EQUIPMENT

Respiratory Protective Equipment (RPE) must be worn at all times when working with asbestos containing materials.

A minimum P2 (P3 preferred) filter consisting of a half face, non-disposable particulate respirator with cartridge (preferred but must be decontaminated and stored correctly after each use) or half face disposable particulate respirator must be used.

Due to differences in facial features of wearers and respirator types is important to ensure that the size is correct to properly fit to the wearer's face.

Respirators must be donned and a fit check completed each time the respirator is used and prior to entering the contaminated area as per the manufacturer's instructions. Refer to Appendix 4 for details on the typical fit check process to be used. Respirators must be inspected for any damage prior to use.

The wearer must be clean shaven in the area of the seal. Facial hair that lies along the sealing area of the respirator, such as beards, sideburns, moustaches, or even a few days of stubble are NOT permitted when wearing a respirator.

Respirators must be worn during the decontamination process and is to be the last item of personal protective equipment removed. All used filter cartridges and disposable particulate masks must be disposed of packaged and disposed of as ACM.

8.0 HEALTH MONITORING

Contractors that carry out licensed asbestos removal work for Telstra are required to complete occupational health monitoring for employees that are:

- carrying out licensed asbestos removal work on its behalf at a workplace and is at risk of exposure to asbestos when carrying out the work; or
- carrying out other ongoing asbestos removal work or asbestos-related work and is at risk of exposure to asbestos when carrying out the work.

Health monitoring should involve a baseline medical assessment before commencement and ongoing medical assessments for workers that continue to complete asbestos removal work every preceding two years.

Records for medical examinations for asbestos removal workers are to be retained in accordance with legislation but not being less than 40 years.

9.0 ASBESTOS AIR SAMPLING/ MONITORING

Telstra undertakes regular air sampling in order to confirm asbestos work activities do not exceed the National Exposure Standard for work it undertakes. There is an expectation that contractors and third parties apply similar due-diligence in this regard.

Further to the above, air monitoring should be considered for asbestos disturbance / removal activities where:

- Works are to take place in close proximity to a sensitive location (e.g. School / Kindergarten);
- There is uncertainty that the work methods will manage the risk of fibre release to below the relevant work exposure standards (e.g. where a method has not been previously assessed); or
- Class A (Friable Asbestos) removal is being conducted.

Where air monitoring is identified as being required, a licenced and competent asbestos assessor / occupational hygienist is to be engaged to complete the monitoring activity.

10.0 ACM PHOTO CHECKLIST

Photo Auditing is a requirement for Contractors undertaking key ACM related activities. Contractors will upload the completed checklist template and information as part of the project complete /as built process.

10.1 Assessment of the checklist

Contract managers will approve the appropriate level of check/audits of ACM photo checklists for the program of works.

Contract managers or their delegate/s are to approve the submitted photos per order basis or in line with their planned auditing frequency.

Where non-conformances are identified contract managers will engage Telstra inspectors to assess and confirm if a non-conformance has occurred.

Potential critical non-conformance reports will be raised in CIMS against checklist attribute/s for actioning by contract managers.

11.0 SOIL ASSESSMENT AND MANAGEMENT REQUIREMENTS

Works likely to involve ground breaking activity must follow the Telstra Soil Management Procedure.

12.0 PACKAGING AND LABELLING OF ASBESTOS WASTE

All asbestos waste must be packaged at the point of waste generation with the following requirements:

- Packaging of material in volumes suitable for safe handling (approximately 15kg);
- Double wrapping (or double bagging) the material using polyethylene sheeting, minimum 200micron polyethylene;
- Secure sealing of bags/ sheeting with adhesive tape or ties; and
- Labelling of asbestos bags with the asbestos warning mark (this marking should be approximately 75 mm x 90 mm), for example:

CAUTION
ASBESTOS

DO NOT OPEN
OR DAMAGE BAG

DO NOT INHALE DUST

13.0 ASBESTOS TRANSPORT, STORAGE AND DISPOSAL OF ASBESTOS WASTE

Telstra requires contractors removing ACM to dispose of the waste in accordance with relevant State / Territory legislative requirements that apply to the location where the waste was generated (summarised in Appendix 5). Movements of ACM waste materials across state or territory borders may also trigger requirements under the Australian Dangerous Goods Code.

ACM must not be left unattended in any public areas (even if double bagged or appropriately wrapped) and should be transported from the worksite (point of generation) to an approved consolidation point or local licenced waste disposal facility as soon as practicable.

13.1 Waste Tracking Requirements

Where required by State and Territory Regulators, waste tracking processes are to be followed. Guidance for each jurisdictions requirements is summarised in Appendix 5.

13.2 Transport of ACM Material

The contractor responsible for removing the waste must adhere to the requirements of the State/Territory legislation. This legislation may require owners of vehicles transporting industrial or commercially sourced asbestos to hold a waste transport licence (or exemption) from the relevant State or Territory Authority. Refer to Appendix 5.1 for guidance.

Contractors tasked with removing ACM are to provide Telstra (specifically, their Contract Manager) with a copy of the transport license for the vehicle removing the waste (if applicable) and details of the person(s) undertaking the waste removal activity prior to task commencement. If a contractor is engaged to transport asbestos waste to a Telstra consolidation site, approval must be obtained from the Telstra Asbestos Consolidation Site Manager.

In accordance with the relevant State or Territory environmental legislation, waste transfer certificates are to be completed (where required) for all waste transported to the asbestos consolidation site or to the waste disposal facility. Waste transfer certificates are to be provided to Telstra upon request.

The transporter is to fill in the site Asbestos Storage and Disposal Register (ASDR) or similar with the required details, as per section 13.3.1 of this procedure “Asbestos Storage and Disposal Register”.

The packaging must remain intact during transport and unloading. Any packaging that is damaged must be replaced or repaired prior to deposit in the consolidation bin or disposal, and where required, vehicles should be cleaned after transporting waste asbestos.

13.3 Asbestos Consolidation Site and Bins (Asbestos Storage)

All asbestos consolidation sites that have been licenced by a statutory body/ regulator are required to have a copy of the relevant licence or exemption present at all times at the site. Contractors must provide details of temporary storage sites to their Telstra Contract Manager (including registration or exemption from registration/licensing). Guidance is provided in Appendix 5.2.

Prior to utilising an asbestos consolidation site managed by Telstra, the contractor must obtain written approval from their Telstra Contractor Manager. Under **NO** circumstances is asbestos waste from non–Telstra works or friable asbestos is to be deposited at Telstra-licenced asbestos consolidation sites.

ACM must not be left unattended in any public areas, or at temporary storage locations (other than Telstra-licenced asbestos consolidation sites), even if double-bagged or double-wrapped in a minimum 200micron polyethylene.

Telstra retains the right to perform audits of ACM consolidation sites and bins to check they are established in accordance with the requirements in this procedure.

13.3.1 Asbestos Storage and Disposal Register

An Asbestos Storage and Disposal Register or similar must be in place on site at all times to record all asbestos received and collected at the Asbestos Consolidation Site. The Telstra ASDR template is available as an example in Appendix 6.

13.4 Waste Transport Certificates and Receipts of Disposal

Where a contractor has completed or coordinated the disposal of ACM waste associated with works undertaken for, or on behalf of Telstra, they are to obtain a completed waste transport certificate from the registered waste recipient that meets the requirements of the relevant State or Territory Environmental Protection legislation.

In addition to the waste transport certificate, Contractors are required to retain a copy of the receipt of payment from the disposal facility (waste disposal receipts) to verify that the disposal facility has been paid to receive and dispose of the asbestos waste material.

Contractors are to retain copies of waste transport certificates and waste disposal receipts with the relevant project files. These records should be retained for a minimum of 7 years (unless nominated otherwise in relevant state or territory legislation) and be made available to Telstra on request for auditing and verification purposes.

Appendix 5 – “Australian Legislative Guidance for Transport, and Disposal of ACM Waste” lists the relevant state and territory legislative instruments that must be complied with for this section.

14.0 MONITORING AND ASSURANCE OF ACM ACTIVITIES

Telstra undertakes monitoring of workers that may disturb ACM in accordance with business rules outlined below.

14.1 Audit and Assurance Framework

Quality Systems and Audit documentation outlines the rules for how audit and inspections are conducted, planning requirements, how audits and inspections are conducted and the competencies required for auditors. Audits and inspection frequency may vary depending on the contractor and the nature of activities being undertaken. Refer to the Audit and Inspection Process Document intranet page for further information.

14.2 Responsibility for Organising Audits and Inspections for Contractors

The responsibility for organising audits and inspections for ACM activities are outlined in CSD55610 - Contracting in Telstra Operations.

14.3 ACM Audit and Inspection Tool

ACM audits and inspections are conducted via the Contractor Information Management System (CIMS) tool. The audit and inspection results are to be stored in the system in accordance with Telstra's record management processes.

15.0 INCIDENT MANAGEMENT AND REPORTING

All notifiable and High Potential Incidents (HPI) asbestos related incidents, as defined in Appendix 1 are to be reported to Telstra immediately. At a frequency determined by your contract manager all asbestos related incidents are required to be submitted and discussed with Telstra.

16.0 DOCUMENT CONTROL SHEET

Document Owners	Louisa Hudson
Position	Director, Health, Safety and Environment

Issue number	Issue date	Details on the change
15	31 October 2018	Inclusion of audit and assurance processes for ACM activities Change all HSE references to HSWE Update to new template
14	31July 2018	Minor update to include links to the ACM WPA and Contractor COE Endorsement Process Inclusion of the Respiratory Protective Equipment and face fit test requirements.
13	30 April 2018	Removal of Collection of ACM debris as a key activity to align with Telstra Asbestos Management Procedure. Prohibited activities to include uncontrolled grinding. Health monitoring provider for asbestos workers included. Inclusion of Telstra Network Site ACM register information. Information on Asbestos air monitoring to align with Telstra Asbestos Management Procedure.
12	28 March 2018	Update to format, removal of duplication and consolidation of information. Included a definition for ACM removal Removed reference to nbn roll out Updated 9.0 Asbestos Transport, Storage and Disposal Requirements – replaced obsolete table and added new guidance including Appendix 5 Legislative Guidance. Included ASDR Template as Appendix 6 Amend the example of work site set up to include note relating to site limitations Updated the Soil Management Process (SMP) reference
11	16 March 2016	Changes to SWMS relating to removal of embedded ACM to enhance clarity and overcome perceived ambiguity. Wording changed from: “If ACM is embedded in the soil and requires the use of force or tools to remove it, treat as ACM Removal and follow Step 11 “Break Up and Remove ACM Pit”. In this instance, the minimum requirement is that all soil excavated will need to be treated as ACM Containing Soil. Additional requirements will be based on Preliminary Soil Screening (PSS) and/or results of Field Inspection Card. Speak to your supervisor or refer to Telstra’s Excess Soil Management Process for guidance on how to transport and dispose of the soil at an approved landfill facility.” To “If ACM is embedded in the soil and cannot be readily removed without the use of force or tools to remove it, treat as ACM Removal and follow Step 11 “Break Up and Remove ACM Pit”. In this instance, soil excavated to remove the embedded ACM will need to be treated as ACM Containing Soil. Additional requirements will be based on Preliminary Soil Screening (PSS) and/or results of Field Inspection Card. Speak to your supervisor or refer to Telstra’s Excess Soil Management Process for guidance on how to transport and dispose of the soil at an approved landfill facility”
9-10	N/A	See version 10.0 on EDMS for details of changes made from v9.0 to v10.0.
1-8	N/A	See version 8.0 on EDMS for details of changes made from v1.0 to v7.0.

17.0 APPENDICES

Appendix 1 – Definitions

TERM	DEFINITION
Access Network	The parts of Telstra's telecommunications infrastructure made up of housings, ducts, pits, manholes and lead-in conduit.
ACM	Asbestos Containing Material
Asbestos Removal Works	***"Work undertaken to deliberately remove all or part of an in-situ ACM product"*** This means the intentional removal of pieces of asbestos material from a location e.g. removing sections of vinyl tiles. This excludes the removal of decontamination materials to wipe down tools and surfaces. This definition is consistent with the WHS regulations and Codes of Practice which defines 'asbestos removal work' as: • Work involving the removal of asbestos or ACM; or • Class A or Class B licensed asbestos removal work.
Asbestos Disturbance Works	***"Work undertaken that has the potential to disturb an in-situ ACM product"*** This means work undertaken where ACM products are present and have the ability to be disturbed without deliberate removal occurring e.g. fixing something to an ACM Sheet Wall such as signage or a fire extinguisher (using screws). This definition includes the disposal of decontamination materials following an activity that is required to touch / interact with ACM products.
Asbestos incident	An asbestos incident includes: • HSWE: ○ Illegal dumping of asbestos waste; ○ Regulator intervention from any aspect of ACM management; or ○ Confirmation by an Industrial Hygienist of asbestos fibre exposure over the exposure standards. • Reputational: ○ ACM waste generated through Telstra activities and left accessible to members of the public identified by a telecommunications employee and rectified prior to 3rd party intervention. The following incidents are classified as a High Potential Incident (HPI): • HSWE: ○ Uncontrolled release of ACM disturbed by a powered activity such as grinding/ pulverising or high speed cutting ACM; or ○ Disturbing ACM without following Telstra asbestos management requirements and resulting in possible personal exposure. • Reputational: ○ ACM waste generated through Telstra activities and left accessible to members of the public and community complaints resulting in 3rd party intervention. An asbestos incident does not include the following events (classified as non-conformances): • Major Non-Conformance - Failure to comply with asbestos procedure requirements for:

TERM	DEFINITION
	○ Plastic sheeting; ○ Notification of residents, commercial, retail or residential properties; ○ Use of licensed and endorsed contractors; ○ Licenced storage of ACM; ○ Waste tracking certificates; ○ Not using ACM bags or equipment for other purposes; or ○ Signage, barricading or guarding. • Minor Non-Conformance - Failure to comply with asbestos procedure requirements for: ○ Double bagging; ○ Not smoking within 10m of an asbestos job; ○ Effective use of personal protective equipment; or ○ Completion of a safe work method statement prior to starting work.
Cellulose fibre	Plant based fibre typically used in paper making.
Equipment Building Network	The parts of Telstra's telecommunications infrastructure made up of buildings or any part of a building owned or leased by Telstra, and used primarily to house telecommunications assets.
Fibre Cement	A cement product that contains fibrous material to provide structural rigidity. The fibres can either be asbestos or cellulose fibre.
Friable (asbestos)	A type of asbestos that, when dry, may be crumbled, pulverised or reduced to powder by hand pressure.
Inert Waste	Solid waste that has no active chemical or biological properties. These wastes do not undergo environmentally significant physical, chemical or biological transformation and have negligible potential to cause environmental harm.
Non-Friable (asbestos)	A type of asbestos that, when dry, cannot be crumbled, pulverised or reduced to powder by hand pressure.
Workplace Assessment (WPA)	Process to verify that workers engaged to complete Key ACM Activities are assessed as being able to work to the SWMS of their company.

Appendix 2 – SWMS Checklist

This document is to be used by Telstra and its Contractors in the development and review of Safe Work Method Statements (SWMS) for ACM works completed within Telstra's network/infrastructure.

A copy of this review is to be attached to the SWMS for future reference if required.

CONTRACTOR NAME: _____

ACTIVITY / TASK REVIEWED: _____

SWMS ID: _____ **Date:** _____

Minimum content to be included in SWMS	Components covered in SWMS Y/N
The training and competency required to complete the activity.	
Hazards & risks associated with the task are clearly identified in the SWMS.	
The following points are addressed throughout the SWMS as a minimum.	
• Site setup requirements (including traffic/pedestrian management and location of underground services/assets – if applicable).	
• Processes to prevent the creation / spread of airborne asbestos fibres.	
• The tools to be used to complete the activity (no power tools are to be used without authorisation from Telstra Management following detailed risk assessment and consultation with a hygienist).	
• Contaminated and excess soil handling and management requirements.	
• Decontamination processes / requirements.	
• Transport and disposal requirements for ACM waste and excess soil (where applicable).	
Control measures outlined in the SWMS are relevant and in keeping with the hierarchy of control and relevant legislation?	
The SWMS has been assessed by an occupational hygienist as being appropriate for the works being carried out.	
Details of worker induction for the SWMS.	
The SWMS is current for the activity being undertaken (i.e. not more than 1 year old / site specific considerations remain unaltered)?	

If the answer to any of the above is "NO", please ensure that the SWMS is updated to reflect these points prior to being accepted.

Reviewed By: _____

Date: _____

Signature: _____

This signoff is **only** for the criteria outlined above. Telstra and its employees engaged to review SWMS's do not take responsibility for the technical accuracy of the content within the Contractors SWMS.

Appendix 3 – Telstra Example SWMS

Appendix 3.1 – ACM Pit Removal SWMS

Activity	Pit Remediation – ACM Pit Removal	**SWMS Version**	v.11
SWMS ID	ARS-5385	**Version Date**	01 March 2015
Organisation Name	Telstra Corporation Limited	**ACN/ABN**	33 051 775 556
List of High Risk Construction Work likely to be involved in this Activity	✓ Risk of a person falling more than 2m ✓ Work Involving the Disturbance of Asbestos ✓ Work Near Energised Electrical Services	✓ Carried out on or near pressurised gas distribution mains or piping ✓ Movement of powered mobile plant ✓ Work undertaken adjacent to a road	
Pre-Start checks / maintenance required	✓ Daily pre-start checks of powered mechanical plant ✓ Plant maintenance in accordance with manufacturers requirements and recommendations		
PPE Required to complete the activity:	 Hearing Protection	 Eye Protection	 P1 / P2 Respirator
	 Protective Footwear	 Disposable Gloves	 Type 5 – Cat 3 Coveralls
Associated Training (qualifications and competencies):	✓ NBN 01099C-Asbestos awareness ✓ CPCCOHS1001A-Working Safely in the Construction Industry ✓ Traffic Management Competency (for relevant State of operation)	✓ CPCCDE3014A – Remove non-friable asbestos ✓ CPCCBC4051A – Supervise asbestos removal (required for supervisors	
Telstra Standards, Procedures or other documents applicable to the works	✓ Asbestos Management Procedure in Telstra – AJZ-9070 ✓ Excess Soil Management Process – AXR-6145		

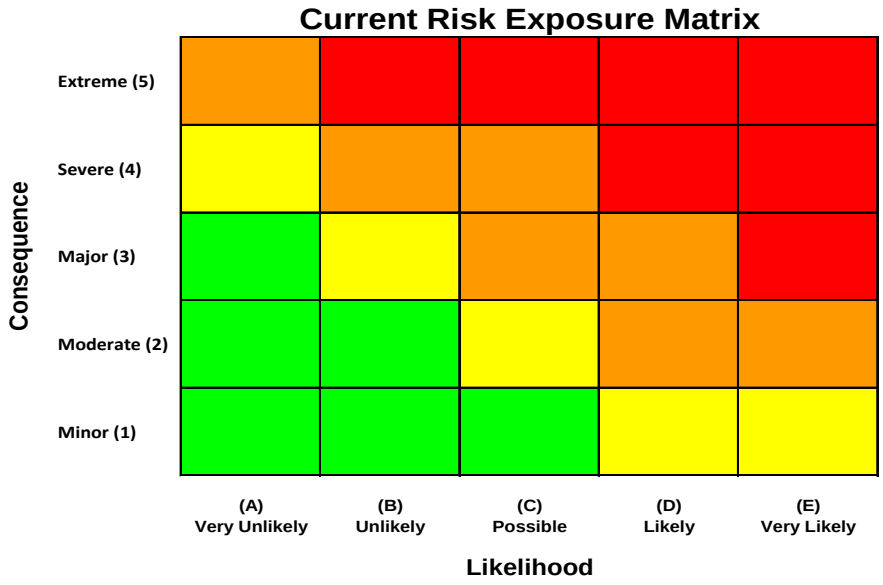
Consequence Table

Number	Description	Rank
1	Injury or harm to one person	Minor
2	Serious injuries or disability sustained to one person	Moderate
3	Serious injuries or disability sustained to multiple persons	Major
4	Total permanent disability or fatality of one person	Severe
5	Total permanent disability or fatality of multiple persons	Extreme

RISK EXPOSURE	
Critical	Critical risk exposure. Objectives will not be achieved. Requires relevant management's highest priority.
High	High risk exposure. Achievement of objectives under serious threat. Requires relevant management's active involvement.
Medium	Medium risk exposure. Some threat to achievement of objectives. Requires relevant management's active monitoring.
Low	Low risk exposure. Achievement of objectives not under threat. Can be dealt with in normal course of business.

Likelihood Assessment Table

Letter	Description	Rank
A	• Would be very surprised if the risk occurred • 1 in 10 year event (or less frequent)	Very Unlikely (or rare)
B	• Risk is not expected to occur. Would be quite surprised if it did. • 1 in 5 year event	Unlikely
C	• Risk may occur, but would not be surprised if it did not • 1 in 2 year event	Possible
D	• Risk is expected to occur. Would be quite surprised if it didn't. • Annual event	Likely
E	• Clear indications that the risk will occur. Would be very surprised if it didn't. • Quarterly event (or more frequent)	Very Likely (or almost certain)



Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
1	Site planning and setup	• Workers being hit by passing vehicles • Vehicle collisions • Pedestrian / MOP hit by passing vehicle • Movement of heavy materials and equipment • Slips / trips and falls • UV / Thermal Stress	**High** 4C	1. Only persons working for a company with a Class 'B' Asbestos removal licence, holding the relevant competencies and current Telstra COO Endorsement are to complete asbestos modification / removal activities 2. Review preliminary soil screening assessment for the site to determine the category of soil and how excess soil is to be managed. 3. Using Telstra's *Low Impact Worksites Traffic Management Plans* (1007298), select the most appropriate 'Traffic Situation' (including safe vehicle parking locations). 4. Where a 'Traffic Situation' cannot be matched to the worksite, contact your Supervisor for assistance as professional traffic management may be required. 5. High visibility clothing must be worn when working on the road side. Where work is to be conducted in low light situations, the high visibility clothing must have reflective strips. 6. Conduct a visual inspection of the work area to look for hazards associated with slips, trips and falls / hazardous flora and fauna, and remove/control where possible 7. Assess the weather conditions for the works location to determine increased risks associated with UV and thermal stress. a) Establish processes to minimise the risks of Thermal Stress (e.g. when to put on / take off PPE, job rotation, mandatory breaks) b) Ensure that appropriate equipment / PPE is available and provided 8. Where additional risks have been identified, the risks and control measures must be documented (e.g. diarised or within the site specific details section of this SWMS)
2	Notify affected residents in person by door knocking	• Aggressive Customers / members of public • Dog bites • Spiders and other dangerous fauna • Slips / trips and falls	**Low** 2B	1. Follow the process for notifying affected residents as outlined in the "Communication Strategy for Activity on Telstra's Pit and Pipe Infrastructure" (ARU-7102) 2. Prior to entering resident's property, conduct a visual inspection of the customer premises to identify potential hazards such as dogs, waste material and debris.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				3. Where an unrestrained dog is identified, **DO NOT ENTER** the premises until contact with the owner has been achieved (e.g. via phone or gate intercom) and the dog has been restrained/secured or isolated. 4. If a resident becomes agitated or aggressive, do not confront or provoke. Seek advice from your Supervisor to determine the most appropriate course of action. Where the customer is threatening or becoming physically aggressive, remove yourself from the site immediately.
3	Opening and Accessing Pits and Manholes	• Asbestos • Sharps (syringes etc.) • Hazardous Manual Handling of Pit Lids • Contaminated air (particularly for manholes) • Slips, trips and falls	**High** 4B	1. All cement pits must be treated as asbestos containing material (ACM). The only exception to this is where you have received documented instruction from Telstra to treat the specific pit as not containing asbestos 2. If opening a manhole, use gas detector to check for contamination / low oxygen levels and follow ***"Working in Telstra pits and manholes 007753"*** 3. Inspect the pit for hazards e.g. sharps, contaminants, spiders and snakes and other hazardous fauna 4. If sharps are identified **(DO NOT PICK UP SYRINGES WITH YOUR HANDS – USE APPROPRIATE DISPOSAL KIT)** - Refer to the *Safe Management of Sharps – Syringes & Needles Procedure* (006501) 5. Follow standard manual handling process for opening / accessing pit/manhole a) Use correct length pit key / tool to open pit / manhole lid b) Bend at your knees / use your legs to lift the weight of the lid (not your back)
4	Mark out Excavation Area	• Spray Paint / Line Marker • Manual handling	**High** 3C	1. Mark out excavation area using suitable means to minimise the amount of soil removal / excavation required 2. Dial Before You Dig Plans **(DBYD PLANS) must be obtained** prior to any soil penetration. This can be either email & printed or using the Smartphone App. 3. Verify that the DBYD Plans are in-date and matches the work site. 4. Undertake a visual inspection of the work site to identify potential underground asset locations, depths & alignment (e.g. pot-holing, use of plant location

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				devices, Visual assessment of site and possible routes of services, where is the gas/power/water) 5. Using the DBYD Plans, mark out services using marker paint. Mark the depth and what service has been highlighted. 6. If required, adjust the Traffic and Pedestrian Management setup to cater for the proposed excavation works. 7. If the proposed digging technique is mechanical plant, ensure that all underground services are carefully pot-holed to visually identify their depth & alignment. 8. If pot-holing results in damage to an underground service immediately contact your supervisor and emergency services if required
5	Removal of turf or pavers (if applicable)	• Manual handling • Slips / trips and falls	**Medium** 2C	1. When removing turf, follow safe work process for using hand tools (including shovel) a) Warm up with muscle stretches/flexes b) Don't overload the shovel c) Position yourself to minimise bending and twisting d) Bend at the knees (not at the waist) 2. When removing pavers, follow standard manual handling techniques a) Select appropriate hand tools to lift the pavers (i.e. non-conductive digging bar / shovel) b) Position yourself to minimise bending and twisting c) Bend at the knees (not at the waist) **d) DO NOT TRY TO LIFT LARGE PAVERS WITHOUT A MECHANICAL AID**
6	Concrete cutting (if applicable)	• Dust (including silica dust) • Excessive Noise • Cutting equipment / cuts, lacerations etc.	**Critical** 4D	**1. DO NOT USE CONCRETE CUTTING SAW UNLESS YOU HAVE BEEN TRAINED IN ITS USE BY A COMPETENT OPERATOR** 2. Follow safe operating procedure for using concrete saw 3. Complete a Pre-Start Checklist for the Concrete Saw 4. Wet-cut techniques are to be used unless not possible

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
		• Trip hazards (hoses and power leads) • Heavy materials • Slippery surfaces (concrete slurry)		5. The following PPE is to be worn by operator: a) P1/P2 Mask b) Hearing Protection c) Eye protection d) Cut Resistant Protective Gloves e) Protective Footwear f) No loose clothing is to be worn 6. Establish exclusion zone. Ensure no other Worker other than the saw operator is in the immediate vicinity of the saw whilst in operation. Workers in close proximity are to wear Hearing Protection. 7. Get assistance or mechanical aid to move heavy materials 8. Clean up concrete slurry caused by cutting activities as soon as possible
7	Excavation Around Pit – Using Hand Tools	• Live services • Asbestos • Manual Handling • Slips, trips and falls • Potentially contaminated soil	**High** 4B	**If the pit can be collapsed in without the need to dig around the pit, skip this step and proceed to "Step 10 - Prepare Site for ACM Pit Removal"** 1. Ensure that the results of the Preliminary Soil Screen are reviewed and that appropriate PPE is selected where required. 2. Evaluate the soil prior to and during excavation using the Soil Inspection Field Card. 3. Identify suitable location for stockpiling excavated soil and place 200 micron poly sheeting under the stockpile location to prevent the potential for contamination of the existing area. (N.B – poly sheeting may not be reused if it has been used for stockpiling of soil containing ACM materials, Class 1 soil, or any soil failing Field Card Inspection or is not in good condition). 4. Tools should be selected to minimise the risk of striking concrete pits resulting in ACM debris being released. E.g. a) Shovels (non-conductive handle) b) Mattocks (non-conductive handle) c) Digging Bars (non-conductive handle – if live electrical services are identified) 5. The following PPE must be worn by Workers when undertaking hand digging:

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				a) Protective Gloves b) Protective Footwear 6. When digging, take care to avoid contact with the pit and any underground services. 7. If excavation results in damage to an underground service immediately contact your supervisor and emergency services if required 8. If loose ACM debris is identified in the soil during excavation, the ACM debris is to be collected and disposed in accordance with the **"COLLECTION OF DEBRIS SUSPECTED OF BEING ACM" SWMS ARS-5384** 9. If ACM is embedded in the soil and cannot be readily removed without the use of force or tools, treat as ACM Removal and follow Step 11 "Break Up and Remove ACM Pit". In this instance, soil excavated to remove the embedded ACM will need to be treated as ACM Containing Soil. The remaining soil should be treated in accordance with the Preliminary Soil Screening (PSS) and/or results of Field Inspection Card. Speak to your supervisor or refer to Telstra's Excess Soil Management Process for guidance on how to transport and dispose of the soil at an approved landfill facility.
8	Excavation around pit – using mechanical excavation (if applicable)	• Plant rollover • Striking workers / MOPs • Striking public property • Striking overhead or underground services • Noise • Manual handling • Slips, trips and falls • ACM	**Critical** 4D	**If the pit can be collapsed in without the need to dig around the pit, skip this step and proceed to "Step 10 - Prepare Site for ACM Pit Removal"** 1. Ensure that the results of the Preliminary Soil Screen are reviewed and that appropriate PPE is selected where required. 2. Evaluate the soil prior to and during excavation using the Soil Inspection Field Card. 3. Identify suitable location for stockpiling excavated soil and place 200 micron poly sheeting under the stockpile location to prevent the potential for contamination of the existing area. (N.B – poly sheeting may not be reused if it has been used for stockpiling of soil containing ACM materials, Class 1 soil, or any soil failing Field Card Inspection or is not in good condition). 4. Undertake a visual inspection of the work site to identify if the excavator's slew range may contact overhead services. If within 5m of overhead electrical asset contact your supervisor.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				5. WHERE THE ITEM OF PLANT REQUIRES A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU ARE LICENCED **6. WHERE THE ITEM OF PLANT DOES NOT REQUIRE A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU HAVE BEEN TRAINED AND HOLD A CERTIFICATE / STATEMENT OF COMPETENCY** 7. Complete a Pre-Start Checklist for the Excavator 8. Ensure a spotter is used when dismounting plant from trucks or trailers or around the work site. 9. Ensure that Workers are not in proximity to Plant when dismounting the plant from a truck or trailer. 10. Excavator Operators are to wear the following PPE: a) Hearing Protection b) Protective Safety Footwear 11. Establish an exclusion zone to ensure no Workers are within the excavator slew range when excavator is in operation. 12. Where practical, a toothless bucket is to be used ensuring that the bucket safety pin is installed. 13. To avoid damaging the pit with the bucket or other part of the mechanical plant, maintain a minimum of 50mm distance between the pit wall and plant while digging. 14. Remove all soil around the pit in accordance with the SMP. If soil remains on the pit wall, this can be manually removed using a shovel or other hand tool. If the soil that is being removed and stockpiled is deemed to be Class 2 or 3 (refer to SMP), ensure that the stockpiled soil is kept separate from any ACM debris. 15. If excavation results in damage to an underground service immediately remove operator and workers from the area and contact your supervisor and emergency services if required 16. If loose ACM debris is identified in the soil during excavation, the ACM debris is to be collected and disposed in accordance with the **"COLLECTION OF DEBRIS SUSPECTED OF BEING ACM" SWMS ARS-5384** 17. If ACM is embedded in the soil and cannot be readily removed without the use of force or tools, treat as ACM Removal and follow Step 11 "Break Up and

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				Remove ACM Pit". In this instance, soil excavated to remove the embedded ACM will need to be treated as ACM Containing Soil. The remaining soil should be treated in accordance with the Preliminary Soil Screening (PSS) and/or results of Field Inspection Card. Speak to your supervisor or refer to Telstra's Excess Soil Management Process for guidance on how to transport and dispose of the soil at an approved landfill facility.
9	Excavation around pit – using vacuum excavation (if applicable)	• Plant rollover • Striking workers / MOPs • Striking public property • Striking overhead or underground services • Noise • Manual Handling • Slips, trips and falls • ACM	**High** 4B	**If the pit can be collapsed in without the need to dig around the pit, skip this step and proceed to "Step 10 - Prepare Site for ACM Pit Removal"** 1. Undertake a visual inspection of the work site to identify if the vacuum truck's apparatus may contact overhead services. If within 5m of overhead electrical asset contact your supervisor. **2. VACUUM EXCAVATOR OPERATORS TO FOLLOW THEIR OWN SWMS FOR VACUUM EXCAVATION PROCESS** 3. Establish an exclusion zone to ensure no Workers are within the Vacuum Truck's Operating Range when truck is in operation. 4. Workers in close proximity are to wear Hearing Protection. *5.* To avoid damaging the pit with the high pressure water, maintain a minimum of 50mm distance between the pit wall and the water jet. 6. Remove all soil around the pit in accordance with Telstra's Excess Soil Management Process. If soil remains on the pit wall, this can be manually removed using a shovel or other hand tool. 7. If excavation results in damage to an underground service immediately contact your supervisor and emergency services if required 8. If ACM debris is identified in the soil during excavation, the ACM debris is to be collected and disposed in accordance with the **"COLLECTION OF DEBRIS SUSPECTED OF BEING ACM" SWMS ARS-5384**
10	Prepare Site for ACM Pit Removal	• ACM-airborne fibre release • Manual handling	**High** 4B	1. Establish an Asbestos Work Area and an inner Asbestos Removal Area. a) The Asbestos Removal Area is to be established using a physical barrier to restrict access (e.g. Pit Guards)

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
		• Cuts and abrasions • Customers / MOPs approaching the site or workers • UV / Thermal Stress		b) The Asbestos Work Area is to be established using self-supporting barriers or bollards and barrier tape c) The distance between the inner Asbestos Removal Area and outer Asbestos Work Area "Buffer Zone" should be sufficient to prevent unauthorised persons entering the area. Where possible, the buffer zone should be no less than 1m d) Set up 2 'Danger Asbestos Removal' signs on the 'Asbestos Work Area' (one facing each direction of traffic flow) **Note:** Appendix 2.7 "Example Ste Setup (Pit and Pipe Remediation Works)" within the Contractor Asbestos Management Guide provides an example of acceptable site setup. 2. Within the Asbestos Removal Area, establish a decontamination zone by placing 200 micron poly sheeting on the ground and doubled asbestos disposal bags dedicated for waste generated during the decontamination process. Asbestos disposal bags must be labelled "Caution- Asbestos. Do not open or break bag. Do not inhale dust" 3. The following PPE is to be worn by **All** Workers within the exclusion zone: a) Type 5, Category 3 Disposable Coveralls (taped at ankle & wrist) b) P1 or P2 disposable mask c) Protective eyewear d) Protective toe capped rubber boots with suitable tread e) Disposable gloves **NOTE**: Due to potential risks associated with thermal stress (overheating), ensure that PPE noted above is only worn when required. 4. Where possible, slide 200 micron poly sheets under the pit (at least 1m either side of each breaking point) to be removed, extending the sheeting on the sides of the excavation. This may require additional excavation. 5. If the 200 micron poly sheet cannot pass under the pit, place poly sheeting on the side of the pit in the excavation area to capture any loose pieces

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
11	Break Up and Remove ACM Pit	• ACM-airborne fibre release • Manual handling • Cuts and abrasions • Customers / MOPs approaching the site or workers	**Critical** 5C	1. Only persons working for a company with a Class 'B' Asbestos removal licence, holding the relevant competencies and current Telstra COO Endorsement are to complete asbestos modification / removal activities 2. Where possible, consider the removal of the pit in its intact form by wrapping in 200 micron poly sheeting and lifting out of ground by mechanical means. 3. If removal of the intact pit is not possible, then thoroughly wet down exposed surfaces of the ACM pit using a knap sack or other suitable means. In dry & windy conditions, this may need to be performed regularly 4. Using one of the following techniques, break the pit inwards attempting to keep pieces as large as possible (select the best option to reduce the amount of fragments released during breakup): a) Using a shovel, lever the outside of the pit wall inwards b) Using a digging bar, leaver the pit wall from the outside c) Using a ball pein hammer, strike the pit wall from the outside d) Using a mash or sledge hammer, hit the pit wall from the outside (least desirable option) 5. Keep pieces as large as possible, place into double bagged asbestos disposal bags 6. Any large pieces removed from the pit that cannot fit into a disposal bag are to be double wrapped in 200 micron poly sheeting **(DO NOT BREAK UP FURTHER IF PRACTICABLE)** a) Wrap the piece(s) of ACM in poly sheeting like a present and tape up b) Repeat the process above, c) Use asbestos warning tape or other appropriate asbestos identifier to label the outer layer of poly sheeting 7. Remove poly sheeting from the excavation by lightly spraying the interior surface of the sheeting with water and carefully fold, capturing any ACM debris. Place the folded sheeting into either the wrapped and sealed poly sheeting or double bagged asbestos disposal bags. 8. Once all visible ACM debris has been collected from the excavation, using a small trowel or shovel scrape the immediate area below the pit to a depth of

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				approximately 20 mm and dispose of the soil as contaminated waste in double bagged asbestos disposal bags. 9. Do not fill bags beyond half full. 10. Once bags are ready to be sealed, pick up and twist the inner bag and fold it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape. Repeat the process for the outer bag. 11. When lifting poly sheeting or asbestos disposal bags that are heavy, ensure manual handling techniques are followed.
12	Decontamination of work area	• Asbestos -airborne fibre release	**Medium** 4A	1. Where pit was in close proximity to a structure such as a fence, building or post box, use a damp cloth to wipe down the structure. Dispose of cloths in an asbestos disposal bag.
13	Decontamination of tools	• Asbestos -airborne fibre release	**Medium** 4A	1. Setup up Asbestos disposal bags to be used for decontamination processes of tools and personnel (e.g. double bagging by placing one Asbestos Disposal bag inside another). 2. All hand tools used during the breaking up of the pit and scraping of top layer (20mm) of soil must be decontaminated. 3. Take required hand tools to the decontamination zone 4. Only Workers who were involved in the ACM removal work and are wearing the required PPE may participate in decontamination. 5. Whilst standing on the poly sheeting, ensure hand tools are wiped down using damp cloths (e.g. wet wipes or wet Chux cloths) unless tool is being disposed. The hand tools should be placed in the dedicated sealable container or in an asbestos disposal bag. 6. Cloths used for decontamination are to be disposed of into the setup asbestos disposal bags
14	Decontamination of Workers	• Asbestos -airborne fibre release	**High** 4B	1. Once decontamination of hand tools is complete, decontamination of Workers is to occur.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				2. Workers are to wipe down their coveralls with a damp cloth (e.g. wet wipe or wet Chux cloth) and place the cloths into the decontamination asbestos disposal bag. 3. Remove tape from cuffs (ankles and wrists) and place into the decontamination asbestos disposal bag. 4. Remove protective eyewear and wipe down with damp cloths. Dispose of cloths in an asbestos disposal bag. Protective eyewear must be placed in a dedicated sealable container marked with the following wording; 'Asbestos Dedicated Protective Equipment - Not to be used on Non Asbestos Work'. 5. Carefully remove coveralls turning them inside out to trap any remaining dust or debris and place into the decontamination asbestos disposal bag. 6. Decontaminate boots by wiping down / removing any debris from the tread. 7. Once boots are decontaminated, step out of the decontamination zone. 8. Carefully fold the poly sheeting on the ground in the decontamination area and dispose of sheeting in the decontamination asbestos disposal bag. 9. Take off disposable gloves place in the decontamination asbestos disposal bag. 10. Seal the inner bag by picking it up and twisting the inner bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape 11. Ensure that the P1/P2 disposable mask is the last item of PPE removed 12. Now place the mask into the outer decontamination asbestos disposal bag and seal by picking it up and twisting the outer bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape 13. Wash hands thoroughly 14. Once decontamination processes have been completed, remove the asbestos removal signage and barrier tape.
15	Excavate area to allow for installation of new pit	• N/A	**N/A**	If the area around the pit requires further excavation to allow for the installation of the new pit, follow one of the following to complete the excavation: • Step 7 "Excavation Around Pit – Using Hand Tools" • Step 8 "Excavation around pit – using mechanical excavation (if applicable)" • Step 9 "Excavation around pit – using vacuum excavation (if applicable)"

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				Once area is excavated, continue to Step 16 – “Install new pit”
16	Install new pit	• Manual Handling • Slips, trips and falls • Mechanical Plant (if required)	**Medium** 2C	1. Follow the installation guidelines relevant for the Pit being installed 2. When installing new pits, follow standard manual handling techniques a) Position yourself to minimise bending and twisting b) Bend at the knees (not at the waist) c) DO NOT TRY TO LIFT LARGE PITS WITHOUT A MECHANICAL AID **3. WHERE THE ITEM OF PLANT REQUIRES A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU ARE LICENCED** 4. **WHERE THE ITEM OF PLANT DOES NOT REQUIRE A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU HAVE BEEN TRAINED AND HOLD A CERTIFICATE / STATEMENT OF COMPETENCY**
18	Backfill of excavation (by hand)	• Asbestos • Manual Handling • Slips, trips and falls	**Medium** 4A	1. Soil that has not been identified as potentially contaminated (in accordance with the Field Inspection Guide) may be used as backfill, as long as it is a suitable material and can achieve the appropriate compaction results. 2. When backfilling excavation, follow safe work process for using hand tools (including shovel) a) Warm up with muscle stretches/flexes b) Don’t overload the shovel c) Position yourself to minimise bending and twisting d) Bend at the knees (not at the waist) 3. The following PPE must be worn by Workers when backfilling excavations by hand: a) Protective Gloves b) Protective Footwear 4. Clean fill to be used for last 100mm of excavation if existing soil was able to be re-used in excavation.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
19	Backfill of excavation (using mechanical plant)	• Plant rollover • Striking workers / MOPs • Striking public property • Striking overhead services • Noise • Manual handling • Slips, trips and falls • ACM	**Critical** 4D	1. Soil that has not been identified as potentially contaminated (in accordance with the Soil Inspection Field Card) may be used as backfill, as long as it is a suitable material and can achieve the appropriate compaction results. 2. No excess soil can be reused at another site as any excess soil from a location must be disposed of at a licensed facility 3. Undertake a visual inspection of the work site to identify if the excavator's slew range may contact overhead services. If within 5m of overhead electrical asset contact your supervisor. **4. WHERE THE ITEM OF PLANT REQUIRES A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU ARE LICENCED** **5. WHERE THE ITEM OF PLANT DOES NOT REQUIRE A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU HAVE BEEN TRAINED AND HOLD A CERTIFICATE / STATEMENT OF COMPETENCY** 6. Complete a Pre-Start Checklist for the Excavator (if not completed on the same day as the initial excavation) 7. Ensure a spotter is used when dismounting plant from trucks or trailers or around the work site. 8. Ensure that Workers are not in proximity to Plant when dismounting the plant from a truck or trailer. 9. Excavator Operators are to wear the following PPE: a) Hearing Protection b) Protective Safety Footwear 10. Establish an exclusion zone to ensure no Workers are within the excavator slew range when excavator is in operation. 11. Clean fill to be used for last 100mm of excavation if existing soil was able to be re-used in excavation.
20	Transportation of excess soil from site	• Contaminated soil	**Low** 2B	1. Excess soil not used on site is required to be transported and disposed of in accordance with the Excess Soil Management Process in a manner consistent with any identified contamination (where applicable). 2. Where ACM is the only identified contaminant within the soil, and the ACM cannot be readily removed by hand, , the soil will need to be treated as ACM

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				Containing Soil and the transport of the soil is to be managed via one of the following methods, and in accordance with Telstra's Excess Soil Management Process: a) Place soil into asbestos bags (double bagged) and sealed. The bags are to be transported within a suitable vehicle or secured down on the tray of a vehicle; or b) Place soil directly into a rubbish skip that has been double lined with heavy-duty (200micron) plastic sheeting; or c) Place soil into transport containers (e.g. steel drums) that have been double lined with heavy-duty (200micron) plastic sheeting; or d) Place soil directly onto the tray of a vehicle, or into a trailer that has been double lined with heavy-duty (200micron) plastic sheeting. 3. For methods b, c and d, the soil is to be kept damp to minimise the generation of dust and airborne asbestos fibres, and covered with a tarp or 200micron poly prior to transport to eliminate soil or dust escaping. 4. The plastic cover on the soil should be labelled in accordance with the Globally Harmonised System of Classification and Labelling of Chemicals
21	Site Clean Up and Remediation	• Manual handling • ACM-airborne fibre release	**Medium** 4A	1. If ACM debris is identified during the site clean-up and remediation, the ACM debris is to be collected and disposed in accordance with the "Collection of Debris Suspected of Being ACM" SWMS ARS-5384 2. Do final check of the site to ensure that it is as safe and clean as practicable

This SWMS has been developed through consultation with our employees and has been read, understood and signed by all employees undertaking the works:

PRINT NAME	SIGNATURE	DATE	PRINT NAME	SIGNATURE	DATE

Appendix 3.2 – ACM Duct Removal / Repair SWMS

Activity	ACM Duct Removal / Repair	**SWMS Version**	v.11
SWMS ID	ARS-5380	**Version Date**	01 March 2015
Organisation Name	Telstra Corporation Limited	**ACN/ABN**	33 051 775 556
List of High Risk Construction Work likely to be involved in this Activity	✓ Risk of a person falling more than 2m ✓ Work Involving the Disturbance of Asbestos ✓ Work Near Energised Electrical Services ✓ Carried out on or near pressurised gas distribution mains or piping ✓ Movement of powered mobile plant ✓ Work undertaken adjacent to a road		
Pre-Start checks / maintenance required	✓ Daily pre-start checks of powered mechanical plant ✓ Plant maintenance in accordance with manufacturers requirements and recommendations		
PPE Required to complete the activity:			

	Hearing Protection	Eye Protection	P1 / P2 Respirator	Protective Footwear	Disposable Gloves	Type 5 – Cat 3 Coveralls		
Associated Training (qualifications and competencies):	✓ NBN 01099C-Asbestos awareness ✓ CPCCOHS1001A-Working Safely in the Construction Industry ✓ Traffic Management Competency (for relevant State of operation)				✓ CPCCDE3014A – Remove non-friable asbestos ✓ CPCCBC4051A – Supervise asbestos removal (required for supervisors			
Telstra Standards, Procedures or other documents applicable to the works	✓ Asbestos Management Procedure in Telstra – AJZ-9070 ✓ Conduit Installation and Maintenance – Pipe and Conduit Repair – Work Instruction 010260W02 ✓ Excess Soil Management Process – AXR-6145							

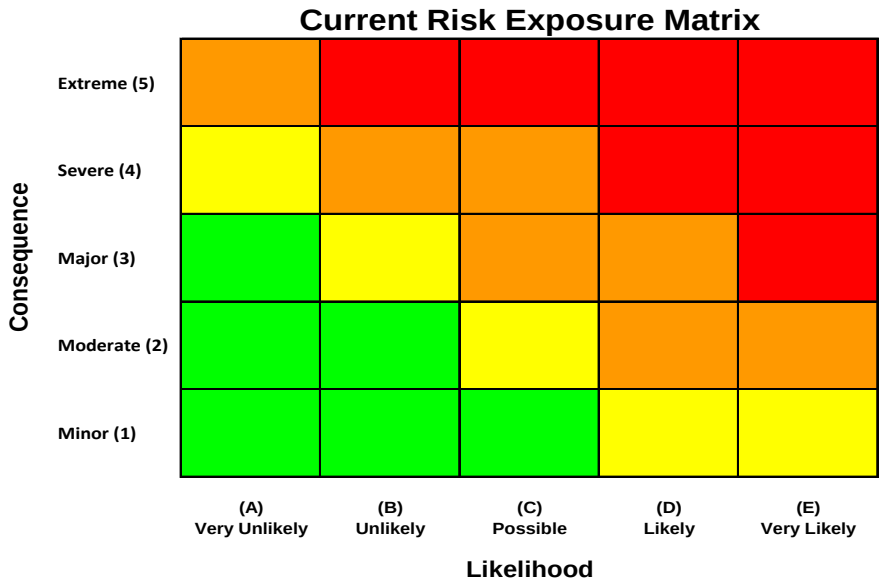
Consequence Table

Number	Description	Rank
1	Injury or harm to one person	Minor
2	Serious injuries or disability sustained to one person	Moderate
3	Serious injuries or disability sustained to multiple persons	Major
4	Total permanent disability or fatality of one person	Severe
5	Total permanent disability or fatality of multiple persons	Extreme

RISK EXPOSURE	
Critical	Critical risk exposure. Objectives will not be achieved. Requires relevant management's highest priority.
High	High risk exposure. Achievement of objectives under serious threat. Requires relevant management's active involvement.
Medium	Medium risk exposure. Some threat to achievement of objectives. Requires relevant management's active monitoring.
Low	Low risk exposure. Achievement of objectives not under threat. Can be dealt with in normal course of business.

Likelihood Assessment Table

Letter	Description	Rank
A	• Would be very surprised if the risk occurred • 1 in 10 year event (or less frequent)	Very Unlikely (or rare)
B	• Risk is not expected to occur. Would be quite surprised if it did. • 1 in 5 year event	Unlikely
C	• Risk may occur, but would not be surprised if it did not • 1 in 2 year event	Possible
D	• Risk is expected to occur. Would be quite surprised if it didn't. • Annual event	Likely
E	• Clear indications that the risk will occur. Would be very surprised if it didn't. • Quarterly event (or more frequent)	Very Likely (or almost certain)



Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
1	Site planning and setup	• Workers being hit by passing vehicles • Vehicle collisions • Pedestrian / MOP hit by passing vehicle • Movement of heavy materials and equipment • Slips / trips and falls • UV / Thermal Stress	**High** 4C	1. Only persons working for a company with a Class 'B' Asbestos removal licence, holding the relevant competencies and current Telstra COO Endorsement are to complete asbestos modification / removal activities 2. Review preliminary soil screening assessment for the site to determine the category of soil and how excess soil is to be managed. 3. Using Telstra's *Low Impact Worksites Traffic Management Plans* (1007298), select the most appropriate 'Traffic Situation' (including safe vehicle parking locations).

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				4. Where a 'Traffic Situation' cannot be matched to the worksite, contact your Supervisor for assistance as professional traffic management may be required. 5. High visibility clothing must be worn when working on the road side. Where work is to be conducted in low light situations, the high visibility clothing must have reflective strips. 6. Conduct a visual inspection of the work area to look for hazards associated with slips, trips and falls / hazardous flora and fauna, and remove/control where possible 7. Assess the weather conditions for the works location to determine increased risks associated with UV and thermal stress. a) Establish processes to minimise the risks of Thermal Stress (e.g. when to put on / take off PPE, job rotation, mandatory breaks) b) Ensure that appropriate equipment / PPE is available and provided 8. Where additional risks have been identified, the risks and control measures must be documented (e.g. diarised or within the site specific details section of this SWMS)
2	Notify affected residents in person by door knocking	• Aggressive Customers / members of public • Dog bites • Spiders and other dangerous fauna • Slips / trips and falls	**Low** 2B	1. Follow the process for notifying affected residents as outlined in the "Communication Strategy for Activity on Telstra's Pit and Pipe Infrastructure" (ARU-7102) 2. Prior to entering resident's property, conduct a visual inspection of the customer premises to identify potential hazards such as dogs, waste material and debris. 3. Where an unrestrained dog is identified, **DO NOT ENTER** the premises until contact with the owner has been achieved (e.g. via phone or gate intercom) and the dog has been restrained/secured or isolated. 4. If a resident becomes agitated or aggressive, do not confront or provoke. Seek advice from your Supervisor to determine the most appropriate course of action. Where the customer is threatening or becoming physically aggressive, remove yourself from the site immediately.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
3	Opening and Accessing Pits and Manholes (if required)	• Asbestos • Sharps (syringes etc.) • Hazardous Manual Handling of Pit Lids • Contaminated air (particularly for manholes) • Slips, trips and falls	**High** 4B	1. All cement pits must be treated as asbestos containing material (ACM). The only exception to this is where you have received documented instruction from Telstra to treat the specific pit as not containing asbestos 2. If opening a manhole, use gas detector to check for contamination / low oxygen levels and follow ***"Working in Telstra pits and manholes 007753"*** 3. Inspect the pit for hazards e.g. sharps, contaminants, spiders and snakes and other hazardous fauna 4. If sharps are identified **(DO NOT PICK UP SYRINGES WITH YOUR HANDS – USE APPROPRIATE DISPOSAL KIT)** - Refer to the *Safe Management of Sharps – Syringes & Needles Procedure* (006501) 5. Follow standard manual handling process for opening / accessing pit/manhole a) Use correct length pit key / tool to open pit / manhole lid b) Bend at your knees / use your legs to lift the weight of the lid (not your back)

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
4	Mark out Excavation Area	• Spray Paint / Line Marker • Manual handling	**High** 3C	1. Mark out excavation area using suitable means to minimise the amount of soil removal / excavation required 2. Dial Before You Dig Plans **(DBYD PLANS) must be obtained** prior to any soil penetration. This can be either email & printed or using the Smartphone App. 3. Verify that the DBYD Plans are in-date and matches the work site. 4. Undertake a visual inspection of the work site to identify potential underground asset locations, depths & alignment (e.g. pot-holing, use of plant location devices, Visual assessment of site and possible routes of services, where is the gas/power/water) 5. Using the DBYD Plans, mark out services using marker paint. Mark the depth and what service has been highlighted. 6. If required, adjust the Traffic and Pedestrian Management setup to cater for the proposed excavation works. 7. If the proposed digging technique is mechanical plant, ensure that all underground services are carefully pot-holed to visually identify their depth & alignment. 8. If pot-holing results in damage to an underground service immediately contact your supervisor and emergency services if required
5	Removal of turf or pavers (if applicable)	• Manual handling • Slips / trips and falls	**Medium** 2C	1. When removing turf, follow safe work process for using hand tools (including shovel) a) Warm up with muscle stretches/flexes b) Don't overload the shovel c) Position yourself to minimise bending and twisting d) Bend at the knees (not at the waist) 2. When removing pavers, follow standard manual handling techniques a) Select appropriate hand tools to lift the pavers (i.e. non-conductive digging bar / shovel) b) Position yourself to minimise bending and twisting c) Bend at the knees (not at the waist)

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				d) DO NOT TRY TO LIFT LARGE PAVERS WITHOUT A MECHANICAL AID
6	Concrete cutting (if applicable)	• Dust (including silica dust) • Excessive Noise • Cutting equipment / cuts, lacerations etc. • Trip hazards (hoses and power leads) • Heavy materials • Slippery surfaces (concrete slurry)	**Critical** 4D	**1. DO NOT USE CONCRETE CUTTING SAW UNLESS YOU HAVE BEEN TRAINED IN ITS USE BY A COMPETENT OPERATOR** 2. Follow safe operating procedure for using concrete saw 3. Complete a Pre-Start Checklist for the Concrete Saw 4. Wet-cut techniques are to be used unless not possible 5. The following PPE is to be worn by operator: a) P1/P2 Mask b) Hearing Protection c) Eye protection d) Cut Resistant Protective Gloves e) Protective Footwear f) No loose clothing is to be worn 6. Establish exclusion zone. Ensure no other Worker other than the saw operator is in the immediate vicinity of the saw whilst in operation. Workers in close proximity are to wear Hearing Protection. 7. Get assistance or mechanical aid to move heavy materials 8. Clean up concrete slurry caused by cutting activities as soon as possible
7	Excavation Around Duct – Using Hand Tools	• Live services • Asbestos • Manual Handling • Slips, trips and falls	**High** 4B	1. Ensure that the results of the Preliminary Soil Screen are reviewed and that appropriate PPE is selected where required. 2. Evaluate the soil prior to and during excavation using the Soil Inspection Guide. 3. Identify suitable location for stockpiling excavated soil and place 200 micron poly sheeting under the stockpile location to prevent the potential for contamination of the existing area. (N.B – poly sheeting may not be reused if it has been used for stockpiling of soil containing ACM materials, Class 1 soil, or any soil failing Field Card Inspection or is not in good condition).

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				4. Tools should be selected to minimise the risk of striking concrete pits resulting in ACM debris being released. E.g. a) Shovels (non-conductive handle) b) Mattocks (non-conductive handle) c) Digging Bars (non-conductive handle – if live electrical services are identified) 5. The following PPE must be worn by Workers when undertaking hand digging: a) Protective Gloves b) Protective Footwear 6. When digging, take care to avoid contact with the pit and any underground services. 7. If excavation results in damage to an underground service immediately contact your supervisor and emergency services if required 8. If loose ACM debris is identified in the soil during excavation, the ACM debris is to be collected and disposed in accordance with the **"COLLECTION OF DEBRIS SUSPECTED OF BEING ACM" SWMS ARS-5384** 9. If ACM is embedded in the soil and cannot be readily removed without the use of force or tools, treat as ACM Removal and follow Step 11 "Break Up and Remove ACM Pit". In this instance, soil excavated to remove the embedded ACM will need to be treated as ACM Containing Soil. The remaining soil should be treated in accordance with the Preliminary Soil Screening (PSS) and/or results of Field Inspection Card. Speak to your supervisor or refer to Telstra's Excess Soil Management Process for guidance on how to transport and dispose of the soil at an approved landfill facility.
8	Excavation around duct – using mechanical excavation (if applicable)	• Plant rollover • Striking workers / MOPs • Striking public property	**Critical** 4D	1. Ensure that the results of the Preliminary Soil Screen are reviewed and that appropriate PPE is selected where required. 2. Evaluate the soil prior to and during excavation using the Soil Inspection Guide.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
		• Striking overhead or underground services • Noise • Manual handling • Slips, trips and falls • ACM		3. Identify suitable location for stockpiling excavated soil and place 200 micron poly sheeting under the stockpile location to prevent the potential for contamination of the existing area. (N.B – poly sheeting may not be reused if it has been used for stockpiling of soil containing ACM materials, Class 1 soil, or any soil failing Field Card Inspection or is not in good condition). 4. Undertake a visual inspection of the work site to identify if the excavator's slew range may contact overhead services. If within 5m of overhead electrical asset contact your supervisor. **5. WHERE THE ITEM OF PLANT REQUIRES A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU ARE LICENCED** **6. WHERE THE ITEM OF PLANT DOES NOT REQUIRE A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU HAVE BEEN TRAINED AND HOLD A CERTIFICATE / STATEMENT OF COMPETENCY** 7. Complete a Pre-Start Checklist for the Excavator 8. Ensure a spotter is used when dismounting plant from trucks or trailers or around the work site. 9. Ensure that Workers are not in proximity to Plant when dismounting the plant from a truck or trailer. 10. Excavator Operators are to wear the following PPE: a) Hearing Protection b) Protective Safety Footwear 11. Establish an exclusion zone to ensure no Workers are within the excavator slew range when excavator is in operation. 12. Where practical, a toothless bucket is to be used ensuring that the bucket safety pin is installed. 13. To avoid damaging the duct with the bucket or other part of the mechanical plant, maintain a minimum of 50mm distance between the duct wall and plant while digging. 14. Remove all soil around the pit in accordance with Telstra's Excess Soil Management Process. If soil remains on the pit wall, this can be manually removed using a shovel or other hand tool. If the soil that is being

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				removed and stockpiled is deemed to be Class 2 or 3 (refer to Telstra's Excess Soil Management Process), ensure that the stockpiled soil is kept separate from any ACM debris. 15. If excavation results in damage to an underground service immediately remove operator and workers from the area and contact your supervisor and emergency services if required 16. If loose ACM debris is identified in the soil during excavation, the ACM debris is to be collected and disposed in accordance with the **"COLLECTION OF DEBRIS SUSPECTED OF BEING ACM" SWMS ARS-5384** 17. If ACM is embedded in the soil and cannot be readily removed without the use of force or tools to remove it, treat as ACM Removal and follow Step 11 "Break Up and Remove ACM Pit". In this instance, soil excavated to remove the embedded ACM will need to be treated as ACM Containing Soil. Additional requirements will be based on Preliminary Soil Screening (PSS) and/or results of Field Inspection Card. Speak to your supervisor or refer to Telstra's Excess Soil Management Process for guidance on how to transport and dispose of the soil at an approved landfill facility.
9	Excavation around duct – using vacuum excavation (if applicable)	• Plant rollover • Striking workers / MOPs • Striking public property • Striking overhead or underground services • Noise • Manual Handling • Slips, trips and falls • ACM	**High** 4B	1. Undertake a visual inspection of the work site to identify if the vacuum truck's apparatus may contact overhead services. If within 5m of overhead electrical asset contact your supervisor. **2. VACUUM EXCAVATOR OPERATORS TO FOLLOW THEIR OWN SWMS FOR VACUUM EXCAVATION PROCESS** 3. Establish an exclusion zone to ensure no Workers are within the Vacuum Truck's Operating Range when truck is in operation. 4. Workers in close proximity are to wear Hearing Protection. 5. To avoid damaging the pit with the high pressure water, maintain a minimum of 50mm distance between the pit wall and the water jet. 6. Remove all soil around the pit in accordance with Telstra's Excess Soil Management Process. If soil remains on the pit wall, this can be manually removed using a shovel or other hand tool.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				7. If excavation results in damage to an underground service immediately contact your supervisor and emergency services if required 8. If ACM debris is identified in the soil during excavation, the ACM debris is to be collected and disposed in accordance with the **"COLLECTION OF DEBRIS SUSPECTED OF BEING ACM" SWMS ARS-5384** 9. If ACM is embedded in the soil and cannot be readily removed without the use of force or tools to remove it, treat as ACM Removal and follow Step 11 "Break Up and Remove ACM Pit". In this instance, soil excavated to remove the embedded ACM will need to be treated as ACM Containing Soil. Additional requirements will be based on Preliminary Soil Screening (PSS) and/or results of Field Inspection Card. Speak to your supervisor or refer to Telstra's Excess Soil Management Process for guidance on how to transport and dispose of the soil at an approved landfill facility.
10	Prepare Site for ACM duct repair	• ACM-airborne fibre release • Manual handling • Cuts and abrasions • Customers / MOPs approaching the site or workers • UV / Thermal Stress	**High** 4B	1. Establish an Asbestos Work Area and an inner Asbestos Removal Area. c) The Asbestos Removal Area is to be established using a physical barrier to restrict access (e.g. Pit Guards) d) The Asbestos Work Area is to be established using self-supporting barriers or bollards and barrier tape e) The distance between the inner Asbestos Removal Area and outer Asbestos Work Area "Buffer Zone" should be sufficient to prevent unauthorised persons entering the area. Where possible, the buffer zone should be no less than 1m f) Set up 2 'Danger Asbestos Removal' signs on the 'Asbestos Work Area' (one facing each direction of traffic flow) **Note:** Appendix 2.7 "Example Ste Setup (Pit and Pipe Remediation Works)" within the Contractor Asbestos Management Guide provides an example of acceptable site setup. 2. Within the Asbestos Removal Area, establish a decontamination zone by placing 200 micron poly sheeting on the ground and doubled asbestos disposal bags dedicated for waste generated during the decontamination

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				process. Asbestos disposal bags must be labelled “Caution- Asbestos. Do not open or break bag. Do not inhale dust” 3. The following PPE is to be worn by **All** Workers within the exclusion zone: a) Type 5, Category 3 Disposable Coveralls (taped at ankle & wrist) b) P1 or P2 disposable mask c) Protective eyewear d) Protective toe capped rubber boots with suitable tread e) Disposable gloves **NOTE**: Due to potential risks associated with thermal stress (overheating), ensure that PPE noted above is only worn when required. 4. Where possible, slide 200 micron poly sheets under the pit (at least 1m either side of each breaking point) to be removed, extending the sheeting on the sides of the excavation. This may require additional excavation. 5. If the 200 micron poly sheet cannot pass under the pit, place poly sheeting on the side of the pit in the excavation area to capture any loose pieces
11	Repair ACM duct using Split Duct Repair Kit	• ACM-airborne fibre release • Manual handling • Cuts and abrasions • Customers / MOPs approaching the site or workers • Trench collapse	**High** 4C	1. Only persons working for a company with a Class ‘B’ Asbestos removal licence, holding the relevant competencies and current Telstra COO Endorsement are to complete asbestos modification / removal activities 2. Thoroughly wet down exposed surface of the ACM duct using a knap sack or other suitable means if a knap sack is not available. In dry & windy conditions, this may need to be regularly applied. 3. Using one of the following techniques, break the duct attempting to keep pieces as large as possible (select the best option to reduce the amount of fragments released during breakup): a) Using a crow bar, leaver the duct from the wall of the excavation b) Using a ball pein hammer c) Using a mash or sledge hammer (least desirable option) 4. Protection of cables enclosed in conduit – when breaking out longer sections of ACM conduit, use a short section of split poly conduit to cover cables along the area to be removed.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				5. Keep pieces as large as possible and place into double bagged asbestos disposal bags 6. If pieces will not fit into the asbestos disposal bags **DO NOT BREAK UP FURTHER**, double wrap them in 200 micron poly sheeting. a) Wrap piece of ACM in poly sheeting like a present and tape up b) Repeat the process above, c) Use asbestos warning tape or other appropriate asbestos identifier to label the outer layer of poly sheeting 7. Wipe clean the exposed cut edges of the in-situ duct ends with a damp cloth to dislodge any loose debris. 8. If cloths are being soaked by dipping into a container, do not re-soak contaminated cloths. Dispose of all contaminated cloths as asbestos waste. 9. If it was possible to have poly sheeting under the duct, lightly spray the sheeting with water and carefully fold, capturing any ACM debris. Place the sheeting into either the wrapped and sealed poly sheeting or asbestos disposal bag. 10. Once all visible ACM debris has been collected from the excavation, using a small trowel scrape the immediate area below the duct (500mm either side of the break points – or further if visible contamination is present) to a depth of approximately 20 mm and dispose of the soil as contaminated waste in double bagged asbestos disposal bags. 11. Do not overfill bags beyond half full. 12. Once bags are ready to be sealed, pick up and twist the inner bag and fold it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape. Repeat the process for the outer bag. 13. When lifting poly sheeting or asbestos disposal bags that are heavy, ensure manual handling techniques are followed.
12	Clean / chamfer exposed ends of duct	• ACM-airborne fibre release	**Critical** 5D	1. Place a plastic sheet under the duct end/s being repaired (chamfered) 2. Apply a thickened gel or paste to edge/s that requires smoothing (chamfering)

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				3. Use a coarse triangular toothed rasp not a file with parallel teeth, do not dry sand 4. Use butyl rubber (mastic) to seal the exposed ends of the ACM duct 5. Apply split duct repair kit following Work Instruction 010260W02
13	Decontamination of work area	• Asbestos -airborne fibre release	**Medium** 4A	1. Where duct was in close proximity to a structure such as a fence, building or post box, use a damp cloth to wipe down the structure. Dispose of cloths in an asbestos disposal bag.
14	Decontamination of tools	• Asbestos -airborne fibre release	**Medium** 4A	1. Setup up Asbestos disposal bags to be used for decontamination processes of tools and personnel (e.g. double bagging by placing one Asbestos Disposal bag inside another). 2. All hand tools used during the breaking up of the pit and scraping of top layer (20mm) of soil must be decontaminated. 3. Take required hand tools to the decontamination zone 4. Only Workers who were involved in the ACM removal work and are wearing the required PPE may participate in decontamination. 5. Whilst standing on the poly sheeting, ensure hand tools are wiped down using damp cloths (e.g. wet wipes or wet Chux cloths) unless tool is being disposed. The hand tools should be placed in the dedicated sealable container or in an asbestos disposal bag. 6. Cloths used for decontamination are to be disposed of into the setup asbestos disposal bags
15	Decontamination of Workers	• Asbestos -airborne fibre release	**High** 4B	1. Once decontamination of hand tools is complete, decontamination of Workers is to occur. 2. Workers are to wipe down their coveralls with a damp cloth (e.g. wet wipe or wet Chux cloth) and place the cloths into the decontamination asbestos disposal bag. 3. Remove tape from cuffs (ankles and wrists) and place into the decontamination asbestos disposal bag.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				4. Remove protective eyewear and wipe down with damp cloths. Dispose of cloths in an asbestos disposal bag. Protective eyewear must be placed in a dedicated sealable container marked with the following wording; 'Asbestos Dedicated Protective Equipment - Not to be used on Non Asbestos Work'. 5. Carefully remove coveralls turning them inside out to trap any remaining dust or debris and place into the decontamination asbestos disposal bag. 6. Decontaminate boots by wiping down / removing any debris from the tread. 7. Once boots are decontaminated, step out of the decontamination zone. 8. Carefully fold the poly sheeting on the ground in the decontamination area and dispose of sheeting in the decontamination asbestos disposal bag. 9. Take off disposable gloves place in the decontamination asbestos disposal bag. 10. Seal the inner bag by picking it up and twisting the inner bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape 11. Ensure that the P1/P2 disposable mask is the last item of PPE removed 12. Now place the mask into the outer decontamination asbestos disposal bag and seal by picking it up and twisting the outer bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape 13. Wash hands thoroughly 14. Once decontamination processes have been completed, remove the asbestos removal signage and barrier tape.
16	Backfill of excavation (by hand)	• Asbestos • Manual Handling • Slips, trips and falls	**Medium** 4A	1. If ACM debris is identified in soil being used during backfill activities **STOP BACKFILLING AND FOLLOW THE "COLLECTION OF DEBRIS SUSPECTED OF BEING ACM" SWMS ARS-5384** 2. When backfilling excavation, follow safe work process for using hand tools (including shovel) a) Warm up with muscle stretches/flexes b) Don't overload the shovel c) Position yourself to minimise bending and twisting d) Bend at the knees (not at the waist)

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				3. The following PPE must be worn by Workers when backfilling excavations by hand: a) P1/P2 Mask (if using existing soil as backfill) b) Protective Gloves c) Protective Footwear 4. Clean fill to be used for last 100mm of excavation if existing soil was able to be re-used in excavation.
17	Backfill of excavation (using mechanical plant)	• Plant rollover • Striking workers / MOPs • Striking public property • Striking overhead services • Noise • Manual handling • Slips, trips and falls • ACM	**Critical** 4D	1. Soil that has not been identified as contaminated (in accordance with the Field Inspection Guide) may be used as backfill, as long as it is a suitable material and can achieve the appropriate compaction results. 2. Undertake a visual inspection of the work site to identify if the excavator's slew range may contact overhead services. If within 5m of overhead electrical asset contact your supervisor. **3. WHERE THE ITEM OF PLANT REQUIRES A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU ARE LICENCED** **4. WHERE THE ITEM OF PLANT DOES NOT REQUIRE A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU HAVE BEEN TRAINED AND HOLD A CERTIFICATE / STATEMENT OF COMPETENCY** 5. Complete a Pre-Start Checklist for the Excavator (if not completed on the same day as the initial excavation) 6. Ensure a spotter is used when dismounting plant from trucks or trailers or around the work site. 7. Ensure that Workers are not in proximity to Plant when dismounting the plant from a truck or trailer. 8. Excavator Operators are to wear the following PPE: a) Hearing Protection b) Protective Safety Footwear 9. Establish an exclusion zone to ensure no Workers are within the excavator slew range when excavator is in operation.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				10. Clean fill to be used for last 100mm of excavation if existing soil was able to be re-used in excavation.
18	Transportation of excess soil from site	• Contaminated soil	**Low** 2B	1. Excess soil not used on site is required to be transported and disposed of in accordance with the Excess Soil Management Process in a manner consistent with any identified contamination (where applicable). 2. Where ACM is the only identified contaminant within the soil, and the ACM cannot be readily removed by hand, , the soil will need to be treated as ACM Containing Soil and the transport of the soil is to be managed via one of the following methods, and in accordance with Telstra's Excess Soil Management Process: a) Place soil into asbestos bags (double bagged) and sealed. The bags are to be transported within a suitable vehicle or secured down on the tray of a vehicle; or b) Place soil directly into a rubbish skip that has been double lined with heavy-duty (200micron) plastic sheeting; or c) Place soil into transport containers (e.g. steel drums) that have been double lined with heavy-duty (200micron) plastic sheeting; or d) Place soil directly onto the tray of a vehicle, or into a trailer that has been double lined with heavy-duty (200micron) plastic sheeting. 3. For methods b, c and d, the soil is to be kept damp to minimise the generation of dust and airborne asbestos fibres, and covered with a tarp or 200micron poly prior to transport to eliminate soil or dust escaping. 4. The plastic cover on the soil should be labelled in accordance with the Globally Harmonised System of Classification and Labelling of Chemicals
19	Site Clean Up and Remediation	• Manual handling • ACM-airborne fibre release	**Medium** 4A	1. Once decontamination processes have been completed, remove the asbestos removal signage and barrier tape. 2. If ACM debris is identified during the site clean-up and remediation, the ACM debris is to be collected and disposed in accordance with the "Collection of Debris Suspected of Being ACM" SWMS ARS-5384

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				3. Do final check of the site to ensure that it is as safe and clean as practicable

This SWMS has been developed through consultation with our employees and has been read, understood and signed by all employees undertaking the works:

PRINT NAME	SIGNATURE	DATE	PRINT NAME	SIGNATURE	DATE

Appendix 3.3 – ACM Pit Break In SWMS

Activity	Pit Remediation – ACM Pit Break-In	**SWMS Version**	v.11
SWMS ID	ARS-5383	**Version Date**	01 March 2015
Organisation Name	Telstra Corporation Limited	**ACN/ABN**	33 051 775 556
List of High Risk Construction Work likely to be involved in this Activity	✓ Risk of a person falling more than 2m ✓ Work Involving the Disturbance of Asbestos ✓ Work Near Energised Electrical Services	✓ Carried out on or near pressurised gas distribution mains or piping ✓ Movement of powered mobile plant ✓ Work undertaken adjacent to a road	
Pre-Start checks / maintenance required	✓ Daily pre-start checks of powered mechanical plant ✓ Plant maintenance in accordance with manufacturers requirements and recommendations		
PPE Required to complete the activity:	 Hearing Protection	 Eye Protection	 P1 / P2 Respirator
	 Protective Footwear	 Disposable Gloves	 Type 5 – Cat 3 Coveralls
Associated Training (qualifications and competencies):	✓ NBN 01099C-Asbestos awareness ✓ CPCCOHS1001A-Working Safely in the Construction Industry ✓ Traffic Management Competency (for relevant State of operation)	✓ CPCCDE3014A – Remove non-friable asbestos ✓ CPCCBC4051A – Supervise asbestos removal (required for supervisors	
Telstra Standards, Procedures or other documents applicable to the works	✓ Asbestos Management Procedure in Telstra – AJZ-9070 ✓ Excess Soil Management Process – AXR-6145		

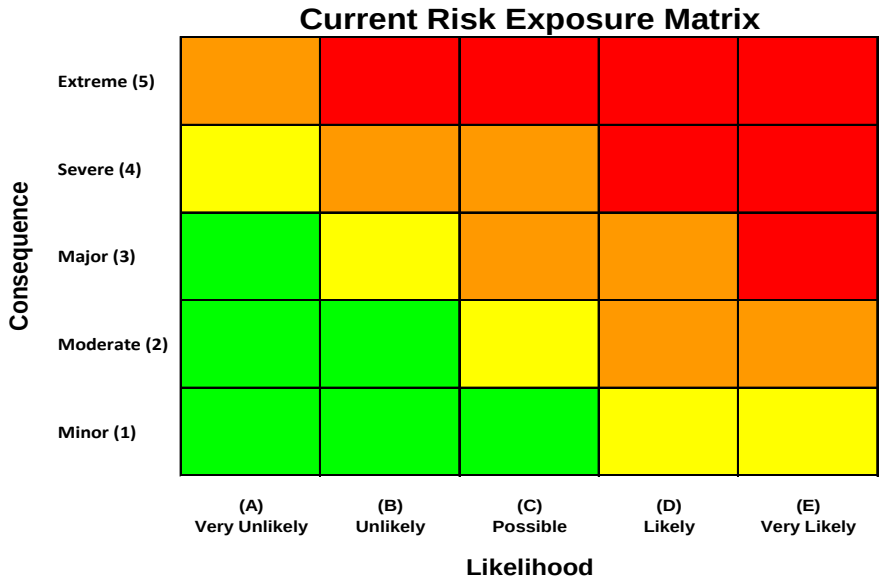
Consequence Table

Number	Description	Rank
1	Injury or harm to one person	Minor
2	Serious injuries or disability sustained to one person	Moderate
3	Serious injuries or disability sustained to multiple persons	Major
4	Total permanent disability or fatality of one person	Severe
5	Total permanent disability or fatality of multiple persons	Extreme

RISK EXPOSURE	
Critical	Critical risk exposure. Objectives will not be achieved. Requires relevant management's highest priority.
High	High risk exposure. Achievement of objectives under serious threat. Requires relevant management's active involvement.
Medium	Medium risk exposure. Some threat to achievement of objectives. Requires relevant management's active monitoring.
Low	Low risk exposure. Achievement of objectives not under threat. Can be dealt with in normal course of business.

Likelihood Assessment Table

Letter	Description	Rank
A	• Would be very surprised if the risk occurred • 1 in 10 year event (or less frequent)	Very Unlikely (or rare)
B	• Risk is not expected to occur. Would be quite surprised if it did. • 1 in 5 year event	Unlikely
C	• Risk may occur, but would not be surprised if it did not • 1 in 2 year event	Possible
D	• Risk is expected to occur. Would be quite surprised if it didn't. • Annual event	Likely
E	• Clear indications that the risk will occur. Would be very surprised if it didn't. • Quarterly event (or more frequent)	Very Likely (or almost certain)



Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
1	Site planning and setup	• Workers being hit by passing vehicles • Vehicle collisions • Pedestrian / MOP hit by passing vehicle • Movement of heavy materials and equipment • Slips / trips and falls • UV / Thermal Stress	**High** 4C	1. Only persons working for a company with a Class 'B' Asbestos removal licence, holding the relevant competencies and current Telstra COO Endorsement are to complete asbestos modification / removal activities 2. Review preliminary soil screening assessment for the site to determine the category of soil and how excess soil is to be managed. 3. Using Telstra's *Low Impact Worksites Traffic Management Plans* (1007298), select the most appropriate 'Traffic Situation' (including safe vehicle parking locations). 4. Where a 'Traffic Situation' cannot be matched to the worksite, contact your Supervisor for assistance as professional traffic management may be required. 5. High visibility clothing must be worn when working on the road side. Where work is to be conducted in low light situations, the high visibility clothing must have reflective strips. 6. Conduct a visual inspection of the work area to look for hazards associated with slips, trips and falls / hazardous flora and fauna, and remove/control where possible 7. Assess the weather conditions for the works location to determine increased risks associated with UV and thermal stress. a) Establish processes to minimise the risks of Thermal Stress (e.g. when to put on / take off PPE, job rotation, mandatory breaks) b) Ensure that appropriate equipment / PPE is available and provided 8. Where additional risks have been identified, the risks and control measures must be documented (e.g. diarised or within the site specific details section of this SWMS)
2	Notify affected residents in person by door knocking	• Aggressive Customers / members of public • Dog bites • Spiders and other dangerous fauna	**Low** 2B	1. Follow the process for notifying affected residents as outlined in the "Communication Strategy for Activity on Telstra's Pit and Pipe Infrastructure" (ARU-7102) 2. Prior to entering resident's property, conduct a visual inspection of the customer premises to identify potential hazards such as dogs, waste material and debris.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
		• Slips / trips and falls		3. Where an unrestrained dog is identified, **DO NOT ENTER** the premises until contact with the owner has been achieved (e.g. via phone or gate intercom) and the dog has been restrained/secured or isolated. 4. If a resident becomes agitated or aggressive, do not confront or provoke. Seek advice from your Supervisor to determine the most appropriate course of action. Where the customer is threatening or becoming physically aggressive, remove yourself from the site immediately.
3	Opening and Accessing Pits and Manholes	• Asbestos • Sharps (syringes etc.) • Hazardous Manual Handling of Pit Lids • Contaminated air (particularly for manholes) • Slips, trips and falls	**High** 4B	1. All cement pits must be treated as asbestos containing material (ACM). The only exception to this is where you have received documented instruction from Telstra to treat the specific pit as not containing asbestos 2. If opening a manhole, use gas detector to check for contamination / low oxygen levels and follow ***"Working in Telstra pits and manholes 007753"*** 3. Inspect the pit for hazards e.g. sharps, contaminants, spiders and snakes and other hazardous fauna 4. If sharps are identified **(DO NOT PICK UP SYRINGES WITH YOUR HANDS – USE APPROPRIATE DISPOSAL KIT)** - Refer to the *Safe Management of Sharps – Syringes & Needles Procedure* (006501) 5. Follow standard manual handling process for opening / accessing pit/manhole a) Use correct length pit key / tool to open pit / manhole lid b) Bend at your knees / use your legs to lift the weight of the lid (not your back)
4	Mark out Excavation Area	• Spray Paint / Line Marker • Manual handling	**High** 3C	1. Mark out excavation area using suitable means to minimise the amount of soil removal / excavation required 2. Dial Before You Dig Plans **(DBYD PLANS) must be obtained** prior to any soil penetration. This can be either email & printed or using the Smartphone App. 3. Verify that the DBYD Plans are in-date and matches the work site.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				4. Undertake a visual inspection of the work site to identify potential underground asset locations, depths & alignment (e.g. pot-holing, use of plant location devices, Visual assessment of site and possible routes of services, where is the gas/power/water) 5. Using the DBYD Plans, mark out services using marker paint. Mark the depth and what service has been highlighted. 6. If required, adjust the Traffic and Pedestrian Management setup to cater for the proposed excavation works. 7. If the proposed digging technique is mechanical plant, ensure that all underground services are carefully pot-holed to visually identify their depth & alignment. 8. If pot-holing results in damage to an underground service immediately contact your supervisor and emergency services if required
5	Removal of turf or pavers (if applicable)	• Manual handling • Slips / trips and falls	**Medium** 2C	1. When removing turf, follow safe work process for using hand tools (including shovel) a) Warm up with muscle stretches/flexes b) Don't overload the shovel c) Position yourself to minimise bending and twisting d) Bend at the knees (not at the waist) 2. When removing pavers, follow standard manual handling techniques a) Select appropriate hand tools to lift the pavers (i.e. non-conductive digging bar / shovel) b) Position yourself to minimise bending and twisting c) Bend at the knees (not at the waist) d) DO NOT TRY TO LIFT LARGE PAVERS WITHOUT A MECHANICAL AID
6	Concrete cutting (if applicable)	• Dust (including silica dust) • Excessive Noise	**Critical** 4D	**1. DO NOT USE CONCRETE CUTTING SAW UNLESS YOU HAVE BEEN TRAINED IN ITS USE BY A COMPETENT OPERATOR** 2. Follow safe operating procedure for using concrete saw

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
		• Cutting equipment / cuts, lacerations etc. • Trip hazards (hoses and power leads) • Heavy materials • Slippery surfaces (concrete slurry)		3. Complete a Pre-Start Checklist for the Concrete Saw 4. Wet-cut techniques are to be used unless not possible 5. The following PPE is to be worn by operator: a) P1/P2 Mask b) Hearing Protection c) Eye protection d) Cut Resistant Protective Gloves e) Protective Footwear f) No loose clothing is to be worn 6. Establish exclusion zone. Ensure no other Worker other than the saw operator is in the immediate vicinity of the saw whilst in operation. Workers in close proximity are to wear Hearing Protection. 7. Get assistance or mechanical aid to move heavy materials 8. Clean up concrete slurry caused by cutting activities as soon as possible
7	Excavation Around Pit – Using Hand Tools	• Live services • Asbestos • Manual Handling • Slips, trips and falls	**High** 4B	1. Ensure that the results of the Preliminary Soil Screen are reviewed and that appropriate PPE is selected where required. 2. Evaluate the soil prior to and during excavation using the Soil Inspection Guide. 3. Identify suitable location for stockpiling excavated soil and place 200 micron poly sheeting under the stockpile location to prevent the potential for contamination of the existing area. (N.B – poly sheeting may not be reused if it has been used for stockpiling of soil containing ACM materials, Class 1 soil, or any soil failing Field Card Inspection or is not in good condition). 4. Tools should be selected to minimise the risk of striking concrete pits resulting in ACM debris being released. E.g. a) Shovels (non-conductive handle) b) Mattocks (non-conductive handle) c) Digging Bars (non-conductive handle – if live electrical services are identified)

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				5. The following PPE must be worn by Workers when undertaking hand digging: a) Protective Gloves b) Protective Footwear 6. When digging, take care to avoid contact with the pit and any underground services. 7. If excavation results in damage to an underground service immediately contact your supervisor and emergency services if required 8. If loose ACM debris is identified in the soil during excavation, the ACM debris is to be collected and disposed in accordance with the **"COLLECTION OF DEBRIS SUSPECTED OF BEING ACM" SWMS ARS-5384** 9. If ACM is embedded in the soil and cannot be readily removed without the use of force or tools, treat as ACM Removal and follow Step 11 "Break Up and Remove ACM Pit". In this instance, soil excavated to remove the embedded ACM will need to be treated as ACM Containing Soil. The remaining soil should be treated in accordance with the Preliminary Soil Screening (PSS) and/or results of Field Inspection Card. Speak to your supervisor or refer to Telstra's Excess Soil Management Process for guidance on how to transport and dispose of the soil at an approved landfill facility.
8	Excavation around pit – using mechanical excavation (if applicable)	• Plant rollover • Striking workers / MOPs • Striking public property • Striking overhead or underground services • Noise • Manual handling • Slips, trips and falls • ACM	**Critical** 4D	1. Ensure that the results of the Preliminary Soil Screen are reviewed and that appropriate PPE is selected where required. 2. Evaluate the soil prior to and during excavation using the Soil Inspection Guide. 3. Identify suitable location for stockpiling excavated soil and place 200 micron poly sheeting under the stockpile location to prevent the potential for contamination of the existing area. 4. Undertake a visual inspection of the work site to identify if the excavator's slew range may contact overhead services. If within 5m of overhead electrical asset contact your supervisor.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				5. WHERE THE ITEM OF PLANT REQUIRES A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU ARE LICENCED **6. WHERE THE ITEM OF PLANT DOES NOT REQUIRE A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU HAVE BEEN TRAINED AND HOLD A CERTIFICATE / STATEMENT OF COMPETENCY** 7. Complete a Pre-Start Checklist for the Excavator 8. Ensure a spotter is used when dismounting plant from trucks or trailers or around the work site. 9. Ensure that Workers are not in proximity to Plant when dismounting the plant from a truck or trailer. 10. Excavator Operators are to wear the following PPE: a) Hearing Protection b) Protective Safety Footwear 11. Establish an exclusion zone to ensure no Workers are within the excavator slew range when excavator is in operation. 12. Where practical, a toothless bucket is to be used ensuring that the bucket safety pin is installed. 13. To avoid damaging the pit with the bucket or other part of the mechanical plant, maintain a minimum of 50mm distance between the pit wall and plant while digging. 14. Remove all soil around the pit in accordance with Telstra's Excess Soil Management Process. If soil remains on the pit wall, this can be manually removed using a shovel or other hand tool. If the soil that is being removed and stockpiled is deemed to be Class 2 or 3 (refer to Telstra's Excess Soil Management Process), ensure that the stockpiled soil is kept separate from any ACM debris. 15. If excavation results in damage to an underground service immediately remove operator and workers from the area and contact your supervisor and emergency services if required 16. If loose ACM debris is identified in the soil during excavation, the ACM debris is to be collected and disposed in accordance with the

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				"COLLECTION OF DEBRIS SUSPECTED OF BEING ACM" SWMS ARS-5384 17. If ACM is embedded in the soil and requires the use of force or tools to remove it.
9	Excavation around pit – using vacuum excavation (if applicable)	• Plant rollover • Striking workers / MOPs • Striking public property • Striking overhead or underground services • Noise • Manual Handling • Slips, trips and falls • ACM	**High** 4B	1. Undertake a visual inspection of the work site to identify if the vacuum truck's apparatus may contact overhead services. If within 5m of overhead electrical asset contact your supervisor. **2. VACUUM EXCAVATOR OPERATORS TO FOLLOW THEIR OWN SWMS FOR VACUUM EXCAVATION PROCESS** 3. Establish an exclusion zone to ensure no Workers are within the Vacuum Truck's Operating Range when truck is in operation. 4. Workers in close proximity are to wear Hearing Protection. 5. To avoid damaging the pit with the high pressure water, maintain a minimum of 50mm distance between the pit wall and the water jet. 6. Remove all soil around the pit in accordance with Telstra's Excess Soil Management Process. If soil remains on the pit wall, this can be manually removed using a shovel or other hand tool. 7. If excavation results in damage to an underground service immediately contact your supervisor and emergency services if required 8. If ACM debris is identified in the soil during excavation, the ACM debris is to be collected and disposed in accordance with the **"COLLECTION OF DEBRIS SUSPECTED OF BEING ACM" SWMS ARS-5384**
10	Prepare Site for ACM Pit break-in	• ACM-airborne fibre release • Manual handling • Cuts and abrasions • Customers / MOPs approaching the site or workers • UV / Thermal Stress	**High** 4B	1. Only persons working for a company with a **'B' Class** removal licence are to complete asbestos modification / removal activities 2. Establish an Asbestos Work Area and an inner Asbestos Removal Area. a) The Asbestos Removal Area is to be established using a physical barrier to restrict access (e.g. Pit Guards) b) The Asbestos Work Area is to be established using self-supporting barriers or bollards and barrier tape

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				c) The distance between the inner Asbestos Removal Area and outer Asbestos Work Area "Buffer Zone" should be sufficient to prevent unauthorised persons entering the area. Where possible, the buffer zone should be no less than 1m d) Set up 2 'Danger Asbestos Removal' signs on the 'Asbestos Work Area' (one facing each direction of traffic flow) **Note:** Appendix 2.7 "Example Ste Setup (Pit and Pipe Remediation Works)" within the Contractor Asbestos Management Guide provides an example of acceptable site setup. 3. Within the Asbestos Removal Area, establish a decontamination zone by placing 200 micron poly sheeting on the ground and doubled asbestos disposal bags dedicated for waste generated during the decontamination process. Asbestos disposal bags must be labelled "Caution- Asbestos. Do not open or break bag. Do not inhale dust" 4. The following PPE is to be worn by **All** Workers within the exclusion zone: a) Type 5, Category 3 Disposable Coveralls (taped at ankle & wrist) b) P1 or P2 disposable mask c) Protective eyewear d) Rubber Boots with suitable tread e) Latex Gloves (disposable) **NOTE**: Due to potential risks associated with thermal stress (overheating), ensure that PPE noted above is only worn when required. 5. Place 200 micron poly sheeting in the excavation area to capture any loose pieces 6. Place 200 micron poly sheeting in the pit to capture broken pieces released during break-in process. Secure with tape if possible.
11	ACM Pit Break-In	• ACM-airborne fibre release • Manual handling • Cuts and abrasions	**High** 4C	1. Thoroughly wet down both inside and outside surfaces of the ACM pit using a knap sack or other suitable means. In dry & windy conditions, this may need to be regularly applied. 2. Measure and mark out the area to be broken-in with a pencil / marker so that breakage will be minimised where possible

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
		• Customers / MOPs approaching the site or workers		3. Apply gel/paste to marked out area on either side of the marked break point (e.g. RSS Encapsulate Gel) 4. Break the pit in the marked location using bolster /chisel and ball pein hammer 5. Wipe down the remainder of the pit surface with a damp cloth and dispose of the cloth into the ACM disposal bag(s) 6. Seal the edges of the break-in point with mortar, mastic or other similar substance on the inside and outside of the pit 7. Keep pieces as large as possible and place into double bagged asbestos disposal bags 8. Prior to removing the poly sheeting from the inside and outside of the pit, lightly spray with water 9. Carefully fold poly sheeting, capturing any ACM debris. Place the sheeting into asbestos disposal bag. 10. Once bags are ready to be sealed, pick up and twist the inner bag and fold it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape. Repeat the process for the outer bag. 11. When lifting poly sheeting or asbestos disposal bags that are heavy, ensure manual handling techniques are followed.
12	Decontamination of work area	• Asbestos -airborne fibre release	**Medium** 4A	1. Where pit was in close proximity to a structure such as a fence, building or post box, use a damp cloth to wipe down the structure. Dispose of cloths in an asbestos disposal bag.
13	Decontamination of tools	• Asbestos -airborne fibre release	**Medium** 4A	1. Setup up Asbestos disposal bags to be used for decontamination processes of tools and personnel (e.g. double bagging by placing one Asbestos Disposal bag inside another). 2. All hand tools used during the breaking up of the pit and scraping of top layer (20mm) of soil must be decontaminated. 3. Take required hand tools to the decontamination zone 4. Only Workers who were involved in the ACM removal work and are wearing the required PPE may participate in decontamination.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				5. Whilst standing on the poly sheeting, ensure hand tools are wiped down using damp cloths (e.g. wet wipes or wet Chux cloths) unless tool is being disposed. The hand tools should be placed in the dedicated sealable container or in an asbestos disposal bag. 6. Cloths used for decontamination are to be disposed of into the setup asbestos disposal bags
14	Decontamination of Workers	• Asbestos -airborne fibre release	**High** 4B	1. Once decontamination of hand tools is complete, decontamination of Workers is to occur. 2. Workers are to wipe down their coveralls with a damp cloth (e.g. wet wipe or wet Chux cloth) and place the cloths into the decontamination asbestos disposal bag. 3. Remove tape from cuffs (ankles and wrists) and place into the decontamination asbestos disposal bag. 4. Remove protective eyewear and wipe down with damp cloths. Dispose of cloths in an asbestos disposal bag. Protective eyewear must be placed in a dedicated sealable container marked with the following wording; 'Asbestos Dedicated Protective Equipment - Not to be used on Non Asbestos Work'. 5. Carefully remove coveralls turning them inside out to trap any remaining dust or debris and place into the decontamination asbestos disposal bag. 6. Decontaminate boots by wiping down / removing any debris from the tread. 7. Once boots are decontaminated, step out of the decontamination zone. 8. Carefully fold the poly sheeting on the ground in the decontamination area and dispose of sheeting in the decontamination asbestos disposal bag. 9. Take off disposable gloves place in the decontamination asbestos disposal bag. 10. Seal the inner bag by picking it up and twisting the inner bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape 11. Ensure that the P1/P2 disposable mask is the last item of PPE removed 12. Now place the mask into the outer decontamination asbestos disposal bag and seal by picking it up and twisting the outer bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				13. Wash hands thoroughly 14. Once decontamination processes have been completed, remove the asbestos removal signage and barrier tape.
15	Backfill of excavation (by hand)	• Asbestos • Manual Handling • Slips, trips and falls	**Medium** 4A	1. Soil that has not been identified as contaminated (in accordance with the Field Inspection Guide) may be used as backfill, as long as it is a suitable material and can achieve the appropriate compaction results. 2. When backfilling excavation, follow safe work process for using hand tools (including shovel) a) Warm up with muscle stretches/flexes b) Don't overload the shovel c) Position yourself to minimise bending and twisting d) Bend at the knees (not at the waist) 3. The following PPE must be worn by Workers when backfilling excavations by hand: a) Protective Gloves b) Protective Footwear 4. Clean fill to be used for last 100mm of excavation if existing soil was able to be re-used in excavation.
16	Backfill of excavation (using mechanical plant)	• Plant rollover • Striking workers / MOPs • Striking public property • Striking overhead services • Noise • Manual handling • Slips, trips and falls • ACM	**Critical** 4D	1. Soil that has not been identified as contaminated (in accordance with the Field Inspection Guide) may be used as backfill, as long as it is a suitable material and can achieve the appropriate compaction results. 2. Undertake a visual inspection of the work site to identify if the excavator's slew range may contact overhead services. If within 5m of overhead electrical asset contact your supervisor. **3. WHERE THE ITEM OF PLANT REQUIRES A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU ARE LICENCED** **4. WHERE THE ITEM OF PLANT DOES NOT REQUIRE A LICENCE, DO NOT OPERATE THE PLANT UNLESS YOU HAVE BEEN TRAINED AND HOLD A CERTIFICATE / STATEMENT OF COMPETENCY**

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				5. Complete a Pre-Start Checklist for the Excavator (if not completed on the same day as the initial excavation) 6. Ensure a spotter is used when dismounting plant from trucks or trailers or around the work site. 7. Ensure that Workers are not in proximity to Plant when dismounting the plant from a truck or trailer. 8. Excavator Operators are to wear the following PPE: a) Hearing Protection b) Protective Safety Footwear 9. Establish an exclusion zone to ensure no Workers are within the excavator slew range when excavator is in operation. 10. Clean fill to be used for last 100mm of excavation if existing soil was able to be re-used in excavation.
17	Transportation of excess soil from site	• Contaminated soil	**Low** 2B	1. Excess soil not used on site is required to be transported and disposed of in accordance with the Excess Soil Management Process in a manner consistent with any identified contamination (where applicable). 2. Where ACM is the only identified contaminant within the soil, and the ACM cannot be readily removed by hand, , the soil will need to be treated as ACM Containing Soil and the transport of the soil is to be managed via one of the following methods, and in accordance with Telstra's Excess Soil Management Process: a) Place soil into asbestos bags (double bagged) and sealed. The bags are to be transported within a suitable vehicle or secured down on the tray of a vehicle; or b) Place soil directly into a rubbish skip that has been double lined with heavy-duty (200micron) plastic sheeting; or c) Place soil into transport containers (e.g. steel drums) that have been double lined with heavy-duty (200micron) plastic sheeting; or d) Place soil directly onto the tray of a vehicle, or into a trailer that has been double lined with heavy-duty (200micron) plastic sheeting.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				3. For methods b, c and d, the soil is to be kept damp to minimise the generation of dust and airborne asbestos fibres, and covered with a tarp or 200micron poly prior to transport to eliminate soil or dust escaping. 4. The plastic cover on the soil should be labelled in accordance with the Globally Harmonised System of Classification and Labelling of Chemicals
18	Site Clean Up and Remediation	• Manual handling • ACM-airborne fibre release	**Medium** 4A	1. If ACM debris is identified during the site clean-up and remediation, the ACM debris is to be collected and disposed in accordance with the "Collection of Debris Suspected of Being ACM" SWMS ARS-5384 2. Do final check of the site to ensure that it is as safe and clean as practicable

This SWMS has been developed through consultation with our employees and has been read, understood and signed by all employees undertaking the works:

PRINT NAME	SIGNATURE	DATE	PRINT NAME	SIGNATURE	DATE

Appendix 3.4 – Collection of ACM Debris SWMS

Activity	Collection of ACM Debris	**SWMS Version**	v.9
SWMS ID	ARS-5384	**Version Date**	01 March 2015
Organisation Name	Telstra Corporation Limited	**ACN/ABN**	33 051 775 556
List of High Risk Construction Work likely to be involved in this Activity	✓ Work Involving the Disturbance of Asbestos ✓ Work Near Energised Electrical Services ✓ Work undertaken adjacent to a road		
Pre-Start checks / maintenance required	✓ Nil Identified		
PPE Required to complete the activity:	 P1 / P2 Respirator  Protective Footwear  Disposable Gloves		
Associated Training (qualifications and competencies):	✓ NBN 01099C-Asbestos awareness		
Telstra Standards, Procedures or other documents applicable to the works	✓ Asbestos Management Procedure in Telstra – AJZ-9070 ✓ Excess Soil Management Process – AXR-6145		

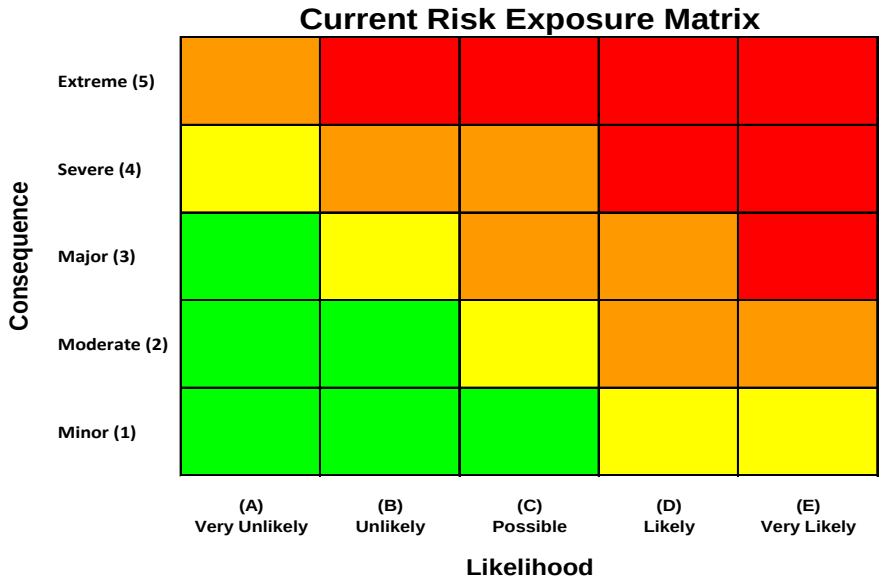
Consequence Table

Number	Description	Rank
1	Injury or harm to one person	Minor
2	Serious injuries or disability sustained to one person	Moderate
3	Serious injuries or disability sustained to multiple persons	Major
4	Total permanent disability or fatality of one person	Severe
5	Total permanent disability or fatality of multiple persons	Extreme

RISK EXPOSURE	
Critical	Critical risk exposure. Objectives will not be achieved. Requires relevant management's highest priority.
High	High risk exposure. Achievement of objectives under serious threat. Requires relevant management's active involvement.
Medium	Medium risk exposure. Some threat to achievement of objectives. Requires relevant management's active monitoring.
Low	Low risk exposure. Achievement of objectives not under threat. Can be dealt with in normal course of business.

Likelihood Assessment Table

Letter	Description	Rank
A	• Would be very surprised if the risk occurred • 1 in 10 year event (or less frequent)	Very Unlikely (or rare)
B	• Risk is not expected to occur. Would be quite surprised if it did. • 1 in 5 year event	Unlikely
C	• Risk may occur, but would not be surprised if it did not • 1 in 2 year event	Possible
D	• Risk is expected to occur. Would be quite surprised if it didn't. • Annual event	Likely
E	• Clear indications that the risk will occur. Would be very surprised if it didn't. • Quarterly event (or more frequent)	Very Likely (or almost certain)



Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
1	Site planning and setup	• Workers being hit by passing vehicles • Vehicle collisions • Pedestrian / MOP hit by passing vehicle • Movement of heavy materials and equipment • Slips / trips and falls	**High** 4C	1. Park vehicle in a safe location; Use of side roads with lower traffic volume is preferable 2. Using Telstra's Low Impact Worksites Traffic Management Plans (1007298), select the most appropriate 'Traffic Situation' 3. Where a 'Traffic Situation' cannot be matched to the worksite, contact your Supervisor for assistance as professional traffic management may be required. 4. High visibility clothing must be worn when working on the road side. Where work is to be conducted in low light situations, the high visibility clothing must have reflective strips. 5. Conduct a visual inspection of the work area to look for hazards associated with slips, trips and falls / hazardous flora and fauna, and remove/control where possible 6. Where additional risks have been identified, the risks and control measures must be documented (e.g. diarised)
2	Opening and Accessing Pits and Manholes	• Asbestos • Sharps (syringes etc.) • Hazardous Manual Handling of Pit Lids • Contaminated air (particularly for manholes) • Slips, trips and falls	**High** 4B	1. All cement pits must be treated as asbestos containing material (ACM). The only exception to this is where you have received documented instruction from Telstra to treat the specific pit as not containing asbestos 2. If opening a manhole, use gas detector to check for contamination / low oxygen levels Telstra staff follow "Working in Telstra pits and manholes 007753" Inspect the pit for hazards e.g. sharps, contaminants, spiders and snakes and other hazardous fauna 3. If sharps are identified (DO NOT PICK UP SYRINGES WITH YOUR HANDS – USE APPROPRIATE DISPOSAL KIT) - Refer to the Safe Management of Sharps – Syringes & Needles Procedure (006501) 4. Follow standard manual handling process for opening / accessing pit/manhole a) Use correct length pit key / tool to open pit / manhole lid b) Bend at your knees / use your legs to lift the weight of the lid (not your back)

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
3	Collection of visible ACM(loose material)	• Asbestos • Slips, trips and falls • Members of Public	**Medium** 4A	1. Minimise the time required to complete ACM collection and decontamination activities 2. Prior to collecting ACM pieces put on appropriate PPE a) P1 or P2 mask b) Disposable gloves 3. Setup up ACM disposal bags (e.g. double bagging by placing one bag inside another.). For small pieces 'zip lock' bags are acceptable. Make sure bags are labelled 'Caution. Asbestos'. 4. Wet down observed surface ACM debris 5. Scoop up debris and a small amount of surrounding soil with a trowel, shovel or set of tongs or if debris is small and the soil is soft, this may be done with glove. 6. Place ACM and soil into inner bag. 7. Once all pieces are collected, wipe down hand tools with a damp cloth (e.g. wet Chux or wet wipe) 8. Place cloths into inner bag and remove gloves -always remove the gloves by turning them inside out. 9. If small zip lock bag was used, place into inner asbestos disposal bag with cloths and disposable PPE 10. Seal inner bag by picking it up and twisting the inner bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape 11. Remove P1/P2 mask and place in between inner and outer bag. 12. Seal outer bag by picking it up and twisting the outer bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape 13. Wash or wipe hands 14. Dispose of debris as asbestos waste. 15. Make sure surrounding surface soil is appropriately reinstated, flat, at correct levels and compacted.
4	Collection of ACM Debris that is embedded	• Asbestos	**N/A**	Where ACM is embedded in the soil, stop work and contact the Telstra Works Supervisor.

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
	in the soil / not easily removed without hand tools or mechanical aids.	• Slips, trips and falls • Members of Public		The collection of ACM debris that is embedded in soil / not easily removed without the use of hand tools or mechanical aids is not within the scope of this SWMS. This requires the contractor to hold a Class 'B' Licence and follow the same process identified within the "Break-up and removal of ACM Pit" section off the ACM Pit Remediation (Removal) SWMS ARS-5385.
5	Transportation of excess soil from site (if relevant)	• Contaminated soil	**Low** 2B	1. Excess soil not used on site is required to be transported and disposed of in accordance with the Excess Soil Management Process in a manner consistent with any identified contamination (where applicable). 2. Where ACM is the only identified contaminant within the soil, and the ACM cannot be readily removed by hand, , the soil will need to be treated as ACM Containing Soil and the transport of the soil is to be managed via one of the following methods, and in accordance with Telstra's Excess Soil Management Process: a) Place soil into asbestos bags (double bagged) and sealed. The bags are to be transported within a suitable vehicle or secured down on the tray of a vehicle; or b) Place soil directly into a rubbish skip that has been double lined with heavy-duty (200micron) plastic sheeting; or c) Place soil into transport containers (e.g. steel drums) that have been double lined with heavy-duty (200micron) plastic sheeting; or d) Place soil directly onto the tray of a vehicle, or into a trailer that has been double lined with heavy-duty (200micron) plastic sheeting. 3. For methods b, c and d, the soil is to be kept damp to minimise the generation of dust and airborne asbestos fibres, and covered with a tarp or 200micron poly prior to transport to eliminate soil or dust escaping. 4. The plastic cover on the soil should be labelled in accordance with the Globally Harmonised System of Classification and Labelling of Chemicals

This SWMS has been developed through consultation with our employees and has been read, understood and signed by all employees undertaking the works:

PRINT NAME	SIGNATURE	DATE	PRINT NAME	SIGNATURE	DATE

Appendix 3.5 – Make Safe Damaged ACM Pits SWMS

Activity	Make Safe Damaged ACM Pits	**SWMS Version**	v.9
SWMS ID	ARS-5386	**Version Date**	01 March 2015
Organisation Name	Telstra Corporation PTY / LTD	**ACN/ABN**	33 051 775 556
List of High Risk Construction Work likely to be involved in this Activity	✓ Work Involving the Disturbance of Asbestos ✓ Work Near Energised Electrical Services ✓ Work undertaken adjacent to a road		
Pre-Start checks / maintenance required	✓ Nil Identified		
PPE Required to complete the activity:	 P1 / P2 Respirator  Protective Footwear  Disposable Gloves  Non-disposable Gloves		
Associated Training (qualifications and competencies):	✓ NBN 01099C-Asbestos awareness ✓ TLA106146A Make safe of Damaged Telstra Pits and Manholes		
Telstra Standards, Procedures or other documents applicable to the works	✓ Asbestos Management Procedure in Telstra – AJZ-9070 ✓ Excess Soil Management Process – AXR-6145		

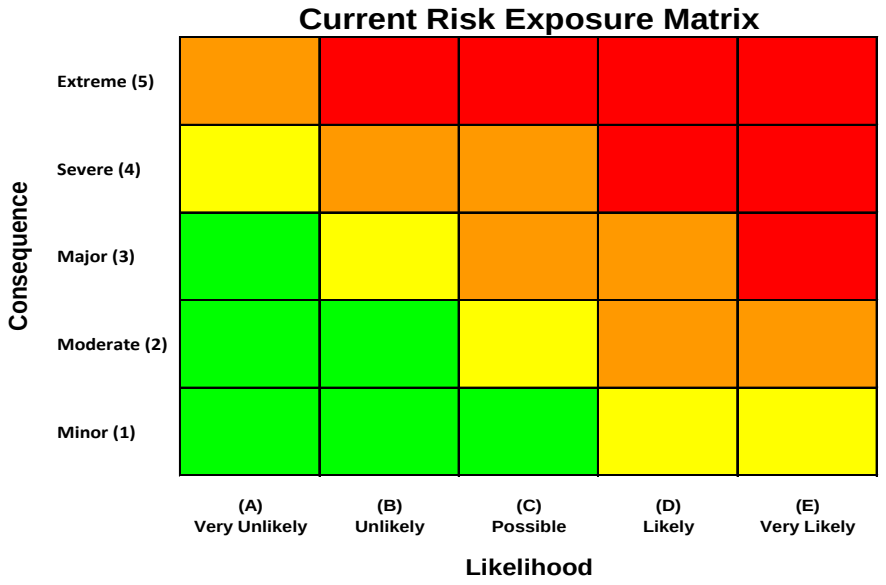
Consequence Table

Number	Description	Rank
1	Injury or harm to one person	Minor
2	Serious injuries or disability sustained to one person	Moderate
3	Serious injuries or disability sustained to multiple persons	Major
4	Total permanent disability or fatality of one person	Severe
5	Total permanent disability or fatality of multiple persons	Extreme

RISK EXPOSURE	
Critical	Critical risk exposure. Objectives will not be achieved. Requires relevant management's highest priority.
High	High risk exposure. Achievement of objectives under serious threat. Requires relevant management's active involvement.
Medium	Medium risk exposure. Some threat to achievement of objectives. Requires relevant management's active monitoring.
Low	Low risk exposure. Achievement of objectives not under threat. Can be dealt with in normal course of business.

Likelihood Assessment Table

Letter	Description	Rank
A	• Would be very surprised if the risk occurred • 1 in 10 year event (or less frequent)	Very Unlikely (or rare)
B	• Risk is not expected to occur. Would be quite surprised if it did. • 1 in 5 year event	Unlikely
C	• Risk may occur, but would not be surprised if it did not • 1 in 2 year event	Possible
D	• Risk is expected to occur. Would be quite surprised if it didn't. • Annual event	Likely
E	• Clear indications that the risk will occur. Would be very surprised if it didn't. • Quarterly event (or more frequent)	Very Likely (or almost certain)



Task #	Job steps	Hazards / Risks	Inherent Risk Class/ Ranking	Controls
1	Site planning and setup	• Workers being hit by passing vehicles • Vehicle collisions • Pedestrian / MOP hit by passing vehicle • Movement of heavy materials and equipment • Slips / trips and falls	**High** 4C	1. Using Telstra's *Low Impact Worksites Traffic Management Plans* (1007298), select the most appropriate 'Traffic Situation'. The selection of the most appropriate traffic situation should take into consideration the make safe method being adopted: a) Use of footway board b) Use of plastic pickets and sheeting c) Use of plastic sheeting, guards and sandbags 2. Where a 'Traffic Situation' cannot be matched to the worksite, contact your Supervisor for assistance as professional traffic management may be required. 3. High visibility clothing must be worn when working on the road side. Where work is to be conducted in low light situations, the high visibility clothing must have reflective strips. 4. Conduct a visual inspection of the work area to look for hazards associated with slips, trips and falls / hazardous flora and fauna, and remove/control where possible 5. Where additional risks have been identified, the risks and control measures must be documented (e.g. diarised)
2	Opening and Accessing Pits	• Asbestos • Sharps (syringes etc.) • Hazardous Manual Handling of Pit Lids • Contaminated air (particularly for manholes) • Slips, trips and falls	**High** 4B	1. All cement pits must be treated as asbestos containing material (ACM). The only exception to this is where you have received documented instruction by Telstra to treat the specific pit as not containing asbestos 2. Inspect the pit for hazards e.g. sharps, contaminants, spiders and snakes and other hazardous fauna 3. If sharps are identified **(DO NOT PICK UP SYRINGES WITH YOUR HANDS – USE APPROPRIATE DISPOSAL KIT)** - Refer to the *Safe Management of Sharps – Syringes & Needles Procedure* (006501) 4. Follow standard manual handling process for opening / accessing pit 5. Use pit key / tool to open pit 6. Bend at your knees / use your legs to lift the weight of the lid (not your back)

Task #	Job steps	Hazards / Risks	Inherent Risk Class/ Ranking	Controls
3	Collection of visible ACM(loose material)	• Asbestos • Slips, trips and falls • Members of Public	**Medium** 4A	1. Minimise the time required to complete ACM collection and decontamination activities 2. Prior to collecting ACM pieces put on appropriate PPE a) P1 or P2 mask b) Disposable gloves 3. Setup up ACM disposal bags (e.g. double bagging by placing one bag inside another.). For small pieces 'zip lock' bags are acceptable. Make sure bags are labelled 'Caution. Asbestos'. 4. Wet down observed surface ACM debris 5. Scoop up debris and a small amount of surrounding soil with a trowel, shovel or set of tongs or if debris is small and the soil is soft, this may be done with glove. 6. Place ACM and soil into inner bag. 7. Once all pieces are collected, wipe down hand tools with a damp cloth (e.g. wet Chux or wet wipe) 8. Place cloths into inner bag and remove gloves -always remove the gloves by turning them inside out. 9. If small zip lock bag was used, place into inner asbestos disposal bag with cloths and disposable PPE 10. Seal inner bag by picking it up and twisting the inner bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape 11. Remove P1/P2 mask and place in between inner and outer bag. 12. Seal outer bag by picking it up and twisting the outer bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape 13. Wash or wipe hands 14. Dispose of debris as asbestos waste. 15. Make sure surrounding surface soil is appropriately reinstated, flat, at correct levels and compacted.

Task #	Job steps	Hazards / Risks	Inherent Risk Class/ Ranking	Controls
4	Collection of ACM debris from within the pit	• ACM • Manual handling • Biological • Sharps	**High** 4C	1. Open pit using pit key 2. Locate any broken ACM within the pit. 3. Minimise the time required to complete ACM collection and decontamination activities 4. Prior to collecting ACM pieces put on appropriate PPE a) P1 or P2 mask b) Disposable gloves 5. Setup up ACM disposal bags (e.g. double bagging by placing one bag inside another.). For small pieces 'zip lock' bags are acceptable. Make sure bags are labelled 'Caution. Asbestos'. 6. Wet down observed surface ACM debris 7. Scoop up debris and a small amount of surrounding soil with a trowel, shovel or set of tongs or if debris is small and the soil is soft, this may be done with glove. 8. Place ACM and soil into inner bag. 9. Once all pieces are collected, wipe down hand tools with a damp cloth (e.g. wet Chux or wet wipe) 10. Place cloths into inner bag and remove gloves -always remove the gloves by turning them inside out. 11. If small zip lock bag was used, place into inner asbestos disposal bag with cloths and disposable PPE 12. Seal inner bag by picking it up and twisting the inner bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape 13. Remove P1/P2 mask and place in between inner and outer bag. 14. Seal outer bag by picking it up and twisting the outer bag. Folding it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape 15. Wash or wipe hands 16. Dispose of debris as asbestos waste. 17. If the pit requires repair, record a CNI

Task #	Job steps	Hazards / Risks	Inherent Risk Class/ Ranking	Controls
5	Make safe Using Footway boards (preferred method)	• Striking underground services • Persons falling into pit • Cuts and abrasions • Uneven / slippery surfaces • Manual handling-Heavy material	**High** 3D	1. Undertake a visual inspection of the work site to identify potential underground asset locations, depths & alignment (gas/power/water/communications) 2. Place 200 micron plastic sheet over the area that will be covered by the footway board 3. Follow procedure 'Make Safe Using a Footway Board Over a Pit-ALP-7141 4. If activity results in damage to an underground service immediately contact your supervisor and emergency services if required 5. Stretch prior to commencing manual handling activities 6. Position yourself to minimise bending and twisting 7. Bend at the knees (not at the waist) 8. The use of non-disposable protective gloves is mandatory when handling the Footway Board. 9. Smoothing out the area where the board will be placed (if possible) so that board sits flat on the ground 10. Use two person lift as required 11. Weight of large Footway Board is 33kg and will require a 2 person lift. 12. Weight of small Footway Board is 12 kg 13. If the pit requires repair, record a CNI
6	Make safe using manhole guard, plastic sheeting and sandbags/weights – hard surfaces (if footway boards can't be used)	• Persons falling into pit • Cuts and abrasions • Uneven / slippery surfaces	**High** 3D	1. Assess the work area and remove risks associated with slips, trips and falls where possible 2. Setup pedestrian/traffic management controls to prevent access to the pit (where necessary to do so) 3. Place 200 micron plastic sheet over the area to be made safe a) Place weights in the corners(i.e. sand bags) of the plastic sheeting to weigh the sheet down, b) Place suitable manhole guard around the pit and secure where possible

Task #	Job steps	Hazards / Risks	Inherent Risk Class/ Ranking	Controls
7	Make safe using plastic pickets and bunting – soft surfaces. (if footway boards can't be used)	• Striking underground services • Persons falling into pit • Cuts and abrasions • Uneven / slippery surfaces	**High** 3D	1. Undertake a visual inspection of the work site to identify potential underground asset locations, depths & alignment (gas/power/water/communications) 2. Assess the work area and remove risks associated with slips, trips and falls where possible 3. Setup pedestrian/traffic management controls to prevent access to the pit (where necessary to do so) 4. Place 200 micron plastic sheet over the area to be made safe a) At the corners of the plastic sheeting, drive in the picket through the sheeting, repeating the process at each corner. The sheeting should be kept taut during this process. b) Once the pickets are in place roll the upright bunting out around the pickets until the area is enclosed. c) Using cable ties, attach the bunting to the pickets. d) The pit site should be checked periodically to make sure the bunting is secure e) If the pit requires repair, record a CNI
8	Collection of ACM Debris that is embedded in the soil / not easily removed without hand tools or mechanical aids.	• Asbestos • Slips, trips and falls • Members of Public	**N/A**	Where ACM is embedded in the soil, stop work and contact the Telstra Works Supervisor. The collection of ACM debris that is embedded in soil / not easily removed without the use of hand tools or mechanical aids is not within the scope of this SWMS. This requires the contractor to hold a Class 'B' Licence and follow the same process identified within the "Break-up and removal of ACM Pit" section off the ACM Pit Remediation (Removal) SWMS ARS-5385.
9	Transportation of excess soil from site (if relevant)	• Contaminated soil	**Low** 2B	1. Excess soil not used on site is required to be transported and disposed of in accordance with the Excess Soil Management Process in a manner consistent with any identified contamination (where applicable). 2. Where ACM is the only identified contaminant within the soil, and the ACM cannot be readily removed by hand, , the soil will need to be treated as ACM Containing Soil and the transport of the soil is to be managed via one

Task #	Job steps	Hazards / Risks	Inherent Risk Class/ Ranking	Controls
				of the following methods, and in accordance with Telstra's Excess Soil Management Process: a) Place soil into asbestos bags (double bagged) and sealed. The bags are to be transported within a suitable vehicle or secured down on the tray of a vehicle; or b) Place soil directly into a rubbish skip that has been double lined with heavy-duty (200micron) plastic sheeting; or c) Place soil into transport containers (e.g. steel drums) that have been double lined with heavy-duty (200micron) plastic sheeting; or d) Place soil directly onto the tray of a vehicle, or into a trailer that has been double lined with heavy-duty (200micron) plastic sheeting. 3. For methods b, c and d, the soil is to be kept damp to minimise the generation of dust and airborne asbestos fibres, and covered with a tarp or 200micron poly prior to transport to eliminate soil or dust escaping. 4. The plastic cover on the soil should be labelled in accordance with the Globally Harmonised System of Classification and Labelling of Chemicals

This SWMS has been developed through consultation with our employees and has been read, understood and signed by all employees undertaking the works:

PRINT NAME	SIGNATURE	DATE	PRINT NAME	SIGNATURE	DATE

Appendix 3.6 – Cutting ACM Vinyl Tiles SWMS

Activity	Cutting ACM Vinyl Tiles	**SWMS Version**	6
SWMS ID	ASU-9220	**Version Date**	01 March 2015
Organisation Name	Telstra Corporation PTY / LTD	**ACN/ABN**	33 051 775 556
List of High Risk Construction Work likely to be involved in this Activity	✓ Work Involving the Disturbance of Asbestos ✓ Work Near Energised Electrical Services		
Pre-Start checks / maintenance required			
PPE Required to complete the activity:	 Hearing Protection  Eye Protection  P1 / P2 Face Shield  Protective Footwear  Disposable Gloves  Type 5 – Cat 3 Coveralls		
Associated Training (qualifications and competencies):	✓ NBN 01099C-Asbestos awareness ✓ CPCCOHS1001A-Working Safely in the Construction Industry ✓ CPCCDE3014A – Remove non-friable asbestos ✓ CPCCBC4051A – Supervise asbestos removal (required for supervisors		
Telstra Standards, Procedures or other documents applicable to the works	✓ Asbestos Management Procedure in Telstra – AJZ-9070 ✓ Excess Soil Management Process – AXR-6145		

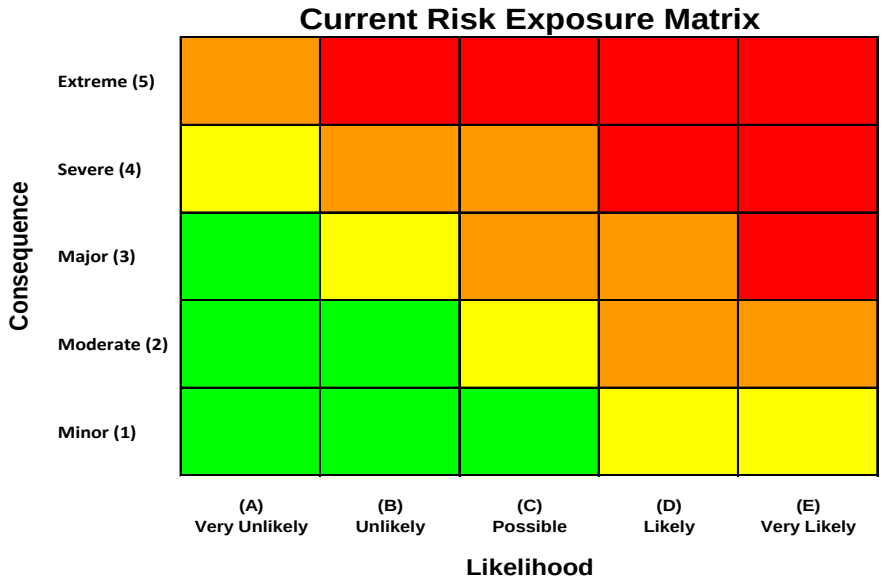
Consequence Table

Number	Description	Rank
1	Injury or harm to one person	Minor
2	Serious injuries or disability sustained to one person	Moderate
3	Serious injuries or disability sustained to multiple persons	Major
4	Total permanent disability or fatality of one person	Severe
5	Total permanent disability or fatality of multiple persons	Extreme

RISK EXPOSURE	
Critical	Critical risk exposure. Objectives will not be achieved. Requires relevant management's highest priority.
High	High risk exposure. Achievement of objectives under serious threat. Requires relevant management's active involvement.
Medium	Medium risk exposure. Some threat to achievement of objectives. Requires relevant management's active monitoring.
Low	Low risk exposure. Achievement of objectives not under threat. Can be dealt with in normal course of business.

Likelihood Assessment Table

Letter	Description	Rank
A	• Would be very surprised if the risk occurred • 1 in 10 year event (or less frequent)	Very Unlikely (or rare)
B	• Risk is not expected to occur. Would be quite surprised if it did. • 1 in 5 year event	Unlikely
C	• Risk may occur, but would not be surprised if it did not • 1 in 2 year event	Possible
D	• Risk is expected to occur. Would be quite surprised if it didn't. • Annual event	Likely
E	• Clear indications that the risk will occur. Would be very surprised if it didn't. • Quarterly event (or more frequent)	Very Likely (or almost certain)



Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
1	Site planning and setup	• Slips / trips and falls	**LOW** 2B	1. Only persons working for a company with a **Class 'B' Asbestos removal licence**, holding the relevant competencies and current Telstra COO Endorsement are to complete asbestos modification / removal activities 2. Complete '*Working in Network Sites – Notice of Proposed Works*" (EDMS File ABT-1323) at least 10 days prior to planned works commencing 3. Conduct a visual inspection of the work area to look for hazards associated with slips, trips and remove/control where possible 4. Where additional risks have been identified, the risks and control measures must be documented (e.g. diarised) 5. Refer to Telstra's 'Method of Procedure (MOP) – Managing Risks When Working in Network Sites' (ABG-1762 / 000169) – where required 6. Complete and Submit '*MOP Proforma*' (000169f02 EDMS ABS4499) – where required / requested 7. Plan works in accordance with the Telstra '*Working in Network Sites Procedure*' (013 731) 8. Liaise with Network Property Facility Manager (NPFM) to determine if other works is planned for the same date/time as proposed works. 9. Review the asbestos register for the site prior to commencing works 10. Gather all PPE / Safety equipment required to complete the task prior to task commencement.
2	Setup work area / exclusion zone	• Slips / trips and falls • Asbestos • Manual handling of guards / exclusion zone equipment	**MEDIUM** 4A	1. Vinyl floor tiles in network properties are to be treated as ACM unless proven otherwise. 2. Review the network facility asbestos register to get an indication of the presence of asbestos 3. Review the work area and remove potential slip / trip hazards where possible 4. Stretch / warm-up prior to task commencement 5. Mark out the proposed penetration area 6. Establish a 3m exclusion zone around penetration area using one of the following methods: a) Telstra Manhole Guards

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				b) Bollards and Barrier Tape c) Barrier Tape d) Safety Cones & Barricade Bars 7. 'Asbestos Related Work in Progress' signage to be displayed 8. If practical, use plastic sheeting, secured with duct tape, to cover any surface near the asbestos work area that could become contaminated 9. Setup an asbestos disposal bag (double bagged – one asbestos bag inside another)
3	Prepare Surface for cutting / penetration	• Asbestos • Slips / trips and falls • Manual handling (kneeling) • Use of toxic marker	**MEDIUM** 4A	1. Apply duct tape over and beyond the planned penetration zone (at least 10cm^2. 2. Mark out the area to be cut onto the duct tape using a non-toxic marker. 3. Use a spray bottle to spray a mist of water over the area to be punched (Smear a suitable water soluble thickened substance (shaving cream or hair gel may also be used to assist with this) 4. Use of kneeling pads when working from knees 5. Immediately clean up any spilled surface preparation products
4	Penetrate vinyl tile – using hole punch and hammer	• Asbestos • Slips / trips and falls • Manual handling (kneeling) • Thermal Stress	**HIGH** 5A	1. Put on PPE required to complete activity: a) P1/P2 Mask b) Protective Eyewear c) Gloves (if porous gloves, they must be worn with an inner non-porous glove – e.g. nitrile or latex. Both sets of gloves must be disposed of at the end of the activity) d) Type 5, Category 3 Disposable Coveralls (taped at ankle & wrist) e) **NOTE**: Due to potential risks associated with thermal stress (overheating), ensure that PPE noted above is only worn when required. 2. Select an appropriate sized hole punch to minimise the area cut / being disturbed 3. Ensure that the punch tool is sharp as possible to minimise effort and damage to tile 4. Immediately place any loose fragments into the asbestos disposal bag 5. Spray water over the punched area

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
5	Penetrate vinyl tile – using chisel and hammer	• Asbestos • Slips / trips and falls • Manual handling (kneeling) • Thermal Stress	**HIGH** 5A	1. Put on PPE required to complete activity: a) P1/P2 Mask b) Protective Eyewear c) Gloves (if porous gloves, they must be worn with an inner non-porous glove – e.g. nitrile or latex. Both sets of gloves must be disposed of at the end of the activity) d) Type 5, Category 3 Disposable Coveralls (taped at ankle & wrist) e) **NOTE**: Due to potential risks associated with thermal stress (overheating), ensure that PPE noted above is only worn when required. 2. Select an appropriate sized chisel to minimise the area cut / being disturbed 3. Ensure that the chisel is sharp as possible to minimise effort and damage to tile 4. Hold the chisel at 45° to the tile surface when hitting with hammer (not perpendicular – straight up/down) 5. Immediately place any loose fragments into the asbestos disposal bag 6. Spray water over the punched area
6	Remove tile and tile adhesive remnants from penetration zone	• Asbestos • Slips / trips and falls • Manual handling (kneeling)	**MEDIUM** 4A	1. Remove tile and associated debris, and place into an asbestos disposal bag 2. Remove vinyl tile adhesive (glue) with a paint scrapper, chisel or screwdriver appropriate to the size of the penetration zone. 3. If the tile is significantly damaged during the cutting process, remove the whole tile to prevent the risk of further degradation / spread of ACM fragments.
7	Clean up / Decontaminate work area	• Asbestos • Slips / trips and falls • Manual handling	**MEDIUM** 4A	1. Remove duct tape from penetration zone (if used) and place in the asbestos disposal bag 2. Conduct a visual inspection of the work area to identify any vinyl tile debris or any other potentially contaminated material and place into asbestos disposal bag if found. 3. If available, apply shaving cream to the penetration zone as part of cleaning process 4. Using a damp cloth (Chux or raw wipe) clean the penetration area and surrounding surfaces and dispose of the cloths into asbestos disposal bag

Task #	Job steps	Hazards / Risks	Risk Class/ Ranking	Controls
				5. Using a disposable paint brush, apply a non-hazardous water based acrylic enamel paint to the edge of the remaining tile surface (at the location of the cut). 6. Dispose of paint brush in Asbestos Waste Bag
8	Decontamination of tools	• Asbestos • Manual handling	**MEDIUM** 4A	1. All hand tools used during ACM vinyl cutting activities are to be decontaminated using the following method: a) wipe down tool boxes or cases used within the Asbestos work area b) Wet wipe tools that are non-porous prior to storage. c) Tools that have porous handles are to be wet wiped and stored in a separate container / asbestos disposal bag, and only be used for ACM related activities 2. Cloths used for wiping down tools must be treated as asbestos contaminated waste and disposed in an asbestos disposal bag.
9	Personal decontamination	• Asbestos	**MEDIUM** 4A	1. Remove and dispose of coveralls and gloves into Asbestos Disposal Bag (Note: if washable non-porous gloves were used, they may be cleaned and placed into a separate container marked with the following wording; 'Asbestos Dedicated Protective Equipment - Not to be used on Non Asbestos Work'. 2. Remove and wipe down protective safety glasses and place into a container marked with the following wording; 'Asbestos Dedicated Protective Equipment - Not to be used on Non Asbestos Work'. 3. Remove disposable P1/P2 mask last and place in asbestos waste bag. Ensure hands are washed thoroughly after activity. 4. Once the disposable PPE and has been placed in the asbestos disposal bag, seal the asbestos disposal bags by twisting the neck of the bag and fold it over to form a 'goose neck'. Wrap the 'goose neck' in duct tape. 5. Remove 'Asbestos Related Work in Progress' signage

This SWMS has been developed through consultation with our employees and has been read, understood and signed by all employees undertaking the works:

PRINT NAME	SIGNATURE	DATE	PRINT NAME	SIGNATURE	DATE

Appendix 3.7 – Example Site Setup (Pit and Pipe Remediation Work)

ASBESTOS WORK AREA
Establish an Asbestos Works Area using self-supporting barriers or bollards and barrier tape (soft barricading)

ASBESTOS REMOVAL AREA
Physical Barriers (e.g. manhole guards) are to be setup around the immediate excavation / trench area where ACM removal works are to take place. This is to prevent unauthorised or accidental access

BUFFER ZONE
The distance between the Asbestos Work Area Barrier and Asbestos Removal Area Barrier (Buffer Zone) should be sufficient to ensure that unauthorised persons are restricted from entering or protruding into the Asbestos Removal Area

SIGNAGE
Set up 2 'Danger Asbestos Removal' signs on the Asbestos Work Area (one facing each direction of traffic flow)

TRAFFIC MANAGEMENT
Appropriate traffic management is to be established for the area taking pedestrian and vehicular impacts into consideration

DECONTAMINATION ZONE
Establish a decontamination zone by placing 200 micron poly sheeting on the ground. This should be within the Asbestos Removal Area

NOTE: The site specific circumstances of each location should be assessed to ensure that the site setup meets regulatory and council requirements, and does not adversely impact vehicular traffic / pedestrians accessing the area.

Appendix 4 – Typical Respirator Fit Check Process

	To conduct a fit check on a disposable half face shield: • Check for gaps around the perimeter of the mask using your fingers / have a workmate complete a visual check for fit; • Check that the edges of the mask are free from obstruction (e.g. facial hair); and • If fitted with a one way exhalation valve, block it off to verify and exhale gently to feel for correct operation
	To conduct a full or half face respirator fit check: • Close off inlet to filter; • Inhale gently; • Hold for 10 seconds; and • Check that the face piece remains slightly collapsed, as it should.

Note:

- Your mask should be worn at all times when working with asbestos
- The wearer must be clean shaven in the area of the seal.
- Half face non-disposable particulate respirator with cartridge is preferred but it must be decontaminated after each use.

Appendix 5 – Australian Legislative Guidance for Transport, Storage and Disposal of ACM Waste

This Australian specific guidance provides a summary of the statutory licensing and other requirements for the transport, temporary storage and disposal of asbestos-containing material (ACM).

The WHS Regulations do not prescribe the manner in which waste is to be transported or disposed of.

This Guide proceeds on the following assumptions:

1. This Guide does not address the obligations for employees and contractors under workplace health and safety regimes with respect to the removal of asbestos.
2. There are technical matters under the Transport of Dangerous Goods by Road or Rail governing the details of transporting the ACM (e.g. placarding and covering/containing) for transport and these are beyond the scope of this Guide.

The information in the below tables is guidance only and should be verified prior to the transportation, temporary storage and disposal of ACM waste.

Appendix 5.1 – Transport of ACM Guidance

Jurisdiction	Legislation	Licensing Requirements	Mode of Transport	Maximum Transportable Quantity	Relevant Exemptions
All sites and activities across Australia	*Work Health and Safety Act 2011* (Cth) ("**WHS Act"**) *Work Health and Safety Regulations 2011* (Cth) ("**WHS Regs"**)	The WHS Act and WHS Regs do not prescribe details for the transport of ACM waste. Oddly, the definition of work involving ACM includes transport but the regulatory provisions do not deal with transport.	N/A	Not prescribed.	Comcare may approve the method adopted for managing risk associated with ACM (r 419(4)).
All sites and activities across Australia	*National Environment Protection (Movement of Controlled Waste between States and Territories) Measure 1998*("**NEPM**") *National Environment Protection Council Act (Cth) 1994, National Environment Protection Measure (Implementation) Act (Cth) 1998* and mirror legislation in each other jurisdiction.	Waste transport certificates are required from the environmental regulator in the jurisdiction of origin prior to interstate transport. Consignment authorisations are required from the environmental regulator in the jurisdiction of destination prior to interstate transport. An authorised waste transporter would need to transport the ACM, not a Telstra employee.	The following must be carried in the cabin of the vehicle transporting the ACM waste, in hard copy: • waste transport certificate (obtained by the producer/consignor of the waste); • transport permit/licence issued by jurisdiction of origin; and • an initial emergency response guide card appropriate to the waste being carried Upon delivery, the transporter must ensure that the relevant section of the waste transport certificate is completed by the receiver and a copy provided. The transporter must also retain a copy (for at least 12 months, but sometimes up to 5 years depending on the jurisdiction). If the transporter becomes aware of any discrepancies in information contained in the waste tracking documentation, they should report this to the relevant department/agency.	N/A	All departments responsible for environment protection in the states and territories may exempt a person from the waste tracking requirements.

Jurisdiction	Legislation	Licensing Requirements	Mode of Transport	Maximum Transportable Quantity	Relevant Exemptions
ACT	*Environment Protection Act 1997* (ACT) *Environment Protection Regulation 2005* (ACT)	No licence is required for Telstra field activities collecting small amounts of ACM to bring to a depot within ACT, as an environmental authorisation is only required for transport of over 200kg of ACM and if the transport is for "fee or reward" (s. 42 of the Act and Item 9, Schedule 1). A waste transporter who is in business for the dominant purpose of transporting waste must be registered (s. 28 of *Dangerous Goods (Road Transport) Act 2009*). If Telstra uses such a business to take ACM from the consolidation point for disposal it must choose a transporter registered under the *Interstate Road Transport Act 1985*.	No details prescribed. No waste tracking requirements for transport within the ACT.	Not prescribed.	Not applicable.
NSW	*Protection of the Environment Operations Act 1997* (NSW) ("**PEO Act**") *Protection of the Environment Operations (Waste) Regulation 2014* (NSW) ("**PEO Regs**")	No licence is required for the transport of ACM within NSW by either Telstra or its contractors (but interstate loads must have a licence). Waste tracking (via EPA's WasteLocate service) is required where transporting more than 100kg or 10 square meters of asbestos (r 79(1)-(2) PEO Regs).	ACM is to be transported in a manner that avoids the waste spilling, leaking or otherwise escaping from the vehicle used to transport the waste. Steps should be taken to ensure the vehicle prevents these issues (r 78 PEO Regs). For transport ACM will need to be securely packaged (if bonded), in a sealed container (if friable) or wetted down (if in soil) (r 78 PEO Regs).	Not prescribed.	*Exemption 1*: There is currently an existing state-wide exemption from waste tracking requirements for any person (not just Telstra) transporting ACM in soil (which will expire on 30 September 2017). *Exemption 2:* An exemption may be sought from the EPA under r 42 (the waste tracking obligations) and r 79(7) (from ACM reporting requirements) of the PEO Regs.

Jurisdiction	Legislation	Licensing Requirements	Mode of Transport	Maximum Transportable Quantity	Relevant Exemptions
			Note proximity principle limits transport to 150 km from premises of origin (with some exceptions) (r 71 PEO Regs).		
NT	*Waste Management and Pollution Control Act* (NT) ("**WMPC Act**") *Waste Management and Pollution Control (Administration) Regulations* (NT) ("**WMPC Regs**")	Environment protection licence or best practice licence is required where the transport is on a commercial or fee for service basis (s 30(3) WMPC Act).	Not prescribed.	Not prescribed.	The EPA may, by notice in writing, declare that a licence is not required if it is satisfied that the risk of environmental harm from the transport is insignificant (s 30(6) WMPC Act).
Qld	*Environmental Protection Act 1994* (Qld) *Environmental Protection Regulation 2008* (Qld)	Licensing requirements are not clearly defined in Queensland legislation. No licence is required for transporting less than 250kg of ACM if this activity is not undertaken for "fee or reward" (r. 81ZA(1)). For volumes greater than 250kg, a Waste Transport Licence is required. Waste tracking documentation must be completed via the Department of Environment and Heritage Protection (EHP) online tool – Connect, or paper forms (r. 81(F)). Documentation must be submitted within the legislative	Waste tracking obligations must be met (unless less than 250kg and not for fee or reward) (r. 81ZA(1)).	Not prescribed.	No exemptions.

Jurisdiction	Legislation	Licensing Requirements	Mode of Transport	Maximum Transportable Quantity	Relevant Exemptions
		prescribed timeframe of 7 days (r. 81(G)).			
SA	*Environment Protection Act 1993* (SA) ("**EP Act**") *Environment Protection (Waste to Resources) Policy 2010* ("**Policy**") *Environment Protection (Movement of Controlled Waste) Policy 2014* ("**Controlled Waste Policy**") EPA Guideline 47711 – *Wastes containing asbestos – removal, transport and disposal*, dated February 2014	If Telstra uses a contractor to transport ACM waste, the contractor must be licensed to do so (s. 36(1) of the Act). This obligation does not distinguish between the transportation of small or large amounts of ACM. If Telstra employees transport ACM, ancillary to their employed work, a licence is not required because the transport of the ACM waste is not "for fee or reward". .Telstra must comply with the waste tracking system which applies to ACM and this includes keeping copies of documents for at least 12 months if the EPA online waste tracking system is not being used (Part 2 of Controlled Waste Policy).	The transport of ACM must be tracked with Telstra obtaining a consignment authority from the disposal facility and a waste transport certificate must accompany the load during transport (Part 2(6) of Controlled Waste Policy). All reasonable and practicable steps must be taken to cover, contain and secure waste transported in a vehicle, including preventing spillages (cl 14 of the Policy). There is also a general requirement to comply with the Australian Code for the Transport of Dangerous Goods by Road and Rail, which requires appropriate packaging and labelling of ACM waste (cl 14 of the Policy).	If licence under the *EP Act* is held, this may be a matter for a specific condition imposed by the EPA.	*Exemption 1:* Any person can apply for a general exemption (for any provision of the *EP Act*, in relation to any activity): s 37 *EP Act.*
TAS	*Environmental Management and Pollution Control Act 1994* ("**EPMC Act**") *Environmental Management and Pollution Control (Controlled Waste*	No licence is required for transport within Tasmania.	Waste tracking administrative requirements apply.	Not prescribed.	Not applicable.

Jurisdiction	Legislation	Licensing Requirements	Mode of Transport	Maximum Transportable Quantity	Relevant Exemptions
	Tracking) Regulations 2010 Environmental Management and Pollution Control (Waste Management) Regulations 2010				
VIC	*Environment Protection Act 1970* (Vic) ("**EP Act**") *Environment Protection (Scheduled Premises) Regulations 2017* (Vic) ("**Scheduled Premises Regs**") *Environment Protection (Industrial Waste Resource) Regulations 2009* (Vic) ("**Industrial Waste Regs**")	Telstra and Telstra contractors require a transport permit to transport ACM unless an exemption has been obtained from the Victorian EPA. (s 53A EP Act). Telstra transporters or contractors must not transport ACM from Telstra premises to other premises unless (r 26(1) Industrial Waste Regs): • the receiving premises is licenced to receive ACM waste; • the receiving premises is exempt from licence requirements (see for example the exemption for temporary storage set out in the next table); or • EPA has granted approval for the transport.	All transport permits must be subject to certain conditions on vehicles used in transport, the packaging of the ACM, and reporting requirements Waste tracking in the form of transport certificates need to be completed by the waste transporter and the waste receiver. The transport certificates are required to be kept for 2 years. (Part 2, Industrial Waste Regs). Waste tracking may not be required if an exemption is sought from the EPA.	Subject to conditions of the transport permit (refer to 'Mode of Transport').	*Exemption 1:* No permit or transport certificate is required if Telstra transports ACM on its own behalf for the purpose of its own operations where the net load is less than 50 kilograms / litres. (s 53 EP Act and r 28 Industrial Waste Regs) *Exemption 2:* No transportation permit required if specific EPA approval for the transportation of ACM is obtained (r 29(1) Industrial Waste Regs). *Exemption 3:* EPA may exempt Telstra from transport permits requirements if satisfied that Telstra holds a valid authorisation to transport ACM in another State or Territory: *s 53 EP Act.*
WA	*Environmental Protection Act 1986 Environmental Protection*	No licence or waste tracking are required for transport of ACM (Regulation 3(5)).	ACM must be separated where reasonably practicable, wrapped and labelled.	Not prescribed.	Not applicable.

Jurisdiction	Legislation	Licensing Requirements	Mode of Transport	Maximum Transportable Quantity	Relevant Exemptions
	(Controlled Waste) Regulations 2004				

Appendix 5.2 – Temporary Storage of ACM Guidance

Jurisdiction	Legislation	Is it lawful to temporarily store ACM at depot or exchange?	Licensing Requirements	Mode of Storage / Maximum storable quantity / maximum duration of storage	Relevant Exemptions
All sites and activities across Australia	*Work Health and Safety Act 2011* (Cth) ("**WHS Act"**) *Work Health and Safety Regulations 2011* (Cth) ("**WHS Regs"**)	Yes, only in certain circumstances.	No licensing requirement for storage but storage must be in accordance with the WHS Regulations which require that the asbestos waste is contained and disposed of at an authorised site *as soon as practicable*.	The duration of storage is unclear given that the obligation is to dispose of the ACM as soon as practicable.	Where regulator approves the method adopted for managing the risks associated with the asbestos
ACT		Yes	No licence is required.	Not prescribed.	Not applicable.
NSW	*Protection of the Environment Operations Act 1997* (NSW) ("**PEO Act**") *Protection of the Environment Operations (Waste) Regulations 2014* (NSW) ("**PEO Regs**")	Yes	No licence is required.	If Telstra stores waste on premises it must ensure that it is stored in an environmentally safe manner.	Not applicable.
NT	*Waste Management and Pollution Control Act* (NT) ("**WMPC Act**") *Waste Management and Pollution Control (Administration) Regulations* (NT) ("**WMPC Regs**")	Yes	Environmental Protection Approval required to construct or expand a temporary storage facility associated with the collection, storage, treatment and disposal of asbestos on a commercial or fee for service basis. All temporary storage facilities designed to accept asbestos also require an Environmental Protection Licence prior to the	If Telstra temporarily stores ACM, EPA prescribes a maximum storage duration of 1 year and an asbestos action plan is to be developed for its management. All temporary storage facilities must be within a secure compound with a perimeter fence of at least 1.8m high wire mesh, a lockable entrance with signage detailing Approval holder and number, hours of operation, the	The EPA may, by notice in writing, declare that a licence is not required if it is satisfied that the risk of environmental harm from the storage is insignificant (s 30(6) WMPC Act).

Jurisdiction	Legislation	Is it lawful to temporarily store ACM at depot or exchange?	Licensing Requirements	Mode of Storage / Maximum storable quantity / maximum duration of storage	Relevant Exemptions
			acceptance of asbestos (s 30(1) and (2) WMPC).	type of waste accepted, 24 hour contact details, and that access is prohibited to unauthorised users. All temporary storage facilities licensed to accept asbestos must also have a designated secure container/s for the acceptance of only ACM (for more, see EPA Guidance – *Asbestos Disposal in the Northern Territory*).	
QLD	*Environmental Protection Act 1994* (Qld)	Yes but only up to 5 days unless an authority is obtained.	An environmental authority is required for regulated waste storage (which includes ACM) with the exception of storing the regulated waste in transit for up to 5 days.	Not prescribed.	None prescribed.
SA	*Environment Protection Act 1993* (SA) ("**EP Act**") *Environment Protection (Waste to Resources) Policy 2010* ("**Policy**") *Environment Protection (Movement of Controlled Waste) Policy 2014* ("**Controlled Waste Policy**")EPA Guideline 47711 – *Wastes containing asbestos – removal,*	Only with authorisation or exemption.	Authorisation from EPA required to conduct a 'waste depot', the definition of which covers most storage scenarios, regardless of whether the waste is in transit or at its final disposal location (s. 113 EP Act). Exceptions to this are limited, and include temporary storage at the place where the waste is produced while awaiting transport and storage (EP Act, Schedule 1, Part A). Asbestos is a Listed Waste under Part B of Schedule 1 of the EP Act.	None specified in legislation but if authorisation or exemption obtained from EPA it would be set out in those documents.	Exemptions set out below: • temporary storage <u>at the place at which the waste is produced</u> while awaiting transportation to another place (this will not apply to Telstra's factual situation); or • a depot that the EPA is satisfied will be conducted for such a limited purpose that the requirement for an environmental authorisation would not be justified; or • general exemption from a requirement of the EP Act.

Jurisdiction	Legislation	Is it lawful to temporarily store ACM at depot or exchange?	Licensing Requirements	Mode of Storage / Maximum storable quantity / maximum duration of storage	Relevant Exemptions
	transport and disposal, dated February 2014				
TAS	*Environmental Management and Pollution Control Act 1994* ("**EPMC Act**") *Environmental Management and Pollution Control (Controlled Waste Tracking) Regulations 2010* *Environmental Management and Pollution Control (Waste Management) Regulations 2010*	Yes	None required under the EMPC Act as the temporary storage is not a Level 2 activity, which are the activities EPA regulates. Only a waste depot receiving more than 100 tonnes per year are required to have approval and we assume that Telstra would not reach this figure (Schedule 2 of EPMC Act)	Not prescribed.	Not applicable.
VIC	*Environment Protection Act 1970* (Vic) ("**EP Act**") *Environment Protection (Scheduled Premises) Regulations 2017* (Vic) ("**Scheduled Premises Regs**") *Environment Protection (Industrial Waste Resource) Regulations 2009* (Vic) ("**Industrial Waste Regs**")	Only if Telstra has a licence for storage of ACM (however note exemption) (s 20(1) EP Act).	Licence required for temporary storage. EPA can grant licence to store waste subject to conditions (s 20(1) EP Act). Telstra transporters or contractors may not permit transport of ACM from Telstra premises to other premises unless the receiving premises is licenced to receive ACM, the receiving premises is exempt from licence requirements, or EPA has granted approval for	None specified in legislation but will be set out in licence conditions or conditions on classification by EPA.	• The new *Scheduled Premises Regulations* provide an exemption from the requirement for a licence for temporary storage of less than 10 cubic metres of ACM if it is non-friable, double-wrapped asbestos not generated on the premises, and stored for no more than 60 days on land used as a depot by a telecommunications carrier or contractor of a telecommunications carrier. The depot must also be 100m or more from sensitive land uses and on the condition it is then

Jurisdiction	Legislation	Is it lawful to temporarily store ACM at depot or exchange?	Licensing Requirements	Mode of Storage / Maximum storable quantity / maximum duration of storage	Relevant Exemptions
			the transport (r 26 Industrial Waste Regs)		transported to a licensed facility for disposal (r 12 Scheduled Premises Regs**).** • A licence is not required where Telstra obtains specific classification for purposes of temporary storage (r 11 Industrial Waste Regs).
WA	*Environmental Protection Act 1986 Environmental Protection (Controlled Waste) Regulations 2004*	Yes.	Not required unless over 500 tonnes.	Not prescribed.	Not applicable.

Appendix 5.3 – Disposal of ACM Guidance

Jurisdiction	Legislation	Where can ACM be disposed?	Obligations on Persons Disposing Waste	Obligations on Persons Receiving Waste
All sites and activities across Australia	*Work Health and Safety Act 2011* (Cth) ("**WHS Act"**) *Work Health and Safety Regulations 2011* (Cth) ("**WHS Regs"**)	Work involving ACM (which includes disposal) must be carried out in accordance with the WHS Regs. Regulation 484 provides that it can only be disposed of a site authorised to accept asbestos waste.	The WHS Regulations require that the asbestos waste is contained and disposed of at an authorised site as soon as practicable.	N/A
NSW	*Protection of the Environment Operations Act 1997* (NSW)	ACM may only be disposed of at a landfill site that can lawfully receive the ACM waste(r 80(1) PEO Regs).	Where Telstra unloads or disposes of asbestos waste at an approved landfill site, it must inform the occupier of the landfill site that the waste contains asbestos (r 80(2) PEO Regs). It must also prevent any dust being generated from the waste and any dust in the waste from being stirred up (r 80(3) PEO Regs).	• The occupier of a landfill site receiving ACM for disposal must comply with its licence conditions and waste tracking requirements. • EPA may grant exemptions to these provisions (Pt 9 of the PEO Regs).
NT	*Waste Management and Pollution Control Act* (NT) ("**WMPC Act**") *Waste Management and Pollution Control (Administration) Regulations* (NT) ("**WMPC Regs**")	ACM may only be disposed of at a landfill site that has an Environmental Protection Licence to accept that waste (s 30 WMPC Act).	Telstra may only dispose of ACM waste if it holds an Environmental Protection Licence to do so (s 30 WMPC Act).	The receiver of the ACM (landfill) must hold an Environmental Protection Licence to do so (s 30 WMPC Act). EPA guidance provides that all landfills licensed to accept asbestos must have a designated area or trench for the acceptance of only ACM.
QLD	*Environmental Protection Regulation 2008* (Qld) (**"EP Regs")**	Facility which holds an environmental authorisation for disposing of ACM.	Waste tracking administrative requirements as per schedule 2F of the EP Regs.	Waste tracking administrative requirements. Will need to comply with the conditions on its environmental authorisation.

Jurisdiction	Legislation	Where can ACM be disposed?	Obligations on Persons Disposing Waste	Obligations on Persons Receiving Waste
SA	*Environment Protection Act 1993* (SA) ("**EP Act**") *Environment Protection (Waste to Resources) Policy 2010* ("**Policy**") *Environment Protection (Movement of Controlled Waste) Policy 2014* ("**Controlled Waste Policy**") EPA Guideline 47711 – *Wastes containing asbestos – removal, transport and disposal*, dated February 2014	ACM may only be disposed of at an authorised waste disposal facility specifically authorised to receive ACM (s 10 of Policy).	Telstra must not dispose of ACM except at authorised waste disposal facility (s 10 of Policy). Telstra must obtain a waste consignment authorisation from the disposal facility (s. 6 of Controlled Waste Policy).	Under the waste tracking system, the receiver must issue a consignment authorisation to Telstra and this allows the transport of the ACM to that facility (noting the authorisation may cover multiple loads over a year). On arrival, the receiver must complete section of the waste transport certificate and must keep copies of documents for at least 12 months unless using the EPA online tracking system (s. 6 of Controlled Waste Policy). There will be on conditions of the environmental authorisation for that specific waste facility.
TAS	*Environmental Management and Pollution Control Act 1994* ("**EPMC Act**") *Environmental Management and Pollution Control (Controlled Waste Tracking) Regulations 2010* *Environmental Management and Pollution Control (Waste Management) Regulations 2010*	Only at an authorised waste disposal facility specifically authorised to receive ACM (r 6 of EMPC (Waste Management) Regs).	Telstra must not dispose of ACM except at authorised waste disposal facility(r 6 of EMPC (Waste Management) Regs).	Telstra will need to comply with the conditions on the environmental approval.
VIC	*Environment Protection Act 1970* (Vic) ("**EP Act**")	ACM may only be disposed of at an appropriately licenced premises licenced by EPA. (s 20(1))	Telstra transporters or contractors may not permit transport of ACM from Telstra premises to other premises unless the	Waste tracking required in the form of transport certificates to be completed by Telstra and the waste receiver. The

Jurisdiction	Legislation	Where can ACM be disposed?	Obligations on Persons Disposing Waste	Obligations on Persons Receiving Waste
	Environment Protection (Scheduled Premises) Regulations 2017 (Vic) ("**Scheduled Premises Regs**") *Environment Protection (Industrial Waste Resource) Regulations 2009* (Vic) ("**Industrial Waste Regs**")	Alternatively, ACM may be disposed of where specific classification has been granted by EPA (r 11(1) Industrial Waste Regs).	receiving premises is licenced to receive ACM, the receiving premises is exempt from licence requirements, or EPA has granted approval for the transport (r 26 Industrial Waste Regs).	transport certificates are required to be kept for 2 years. Waste receiver will need to comply with its own licence conditions.
WA	*Environmental Protection Act 1986*	ACM may only be disposed of at a waste facility approved for ACM (s 52 and Regulation 43).	To ensure ACM is disposed of at licensed facility.	Waste receiver to comply with own licence conditions.

Appendix 6 – Example Asbestos Storage and Disposal Register Template

The Telstra Permitted ACM Interim Storage Location Manager (SLM) is:
Name _____ Ph. _____

Action by person/s depositing asbestos waste material
Before depositing any asbestos bags in the asbestos bin you must:

1) Ensure all of the asbestos material has been double bagged and sealed correctly. Count the number of bags being deposited;
2) Weigh all asbestos bags and calculate the total weight (kg);
3) Write the next available sequence number on every asbestos bag you are depositing with a permanent marker (it will be the same number on all the bags you are depositing at that time);
4) Enter details in the row matching the sequence number you recorded on the asbestos bags;
5) Obtain the asbestos bin key, unlock the bin/s and deposit your asbestos bags; and
6) Ensure that the asbestos bin is locked and the key returned.

Actions by person arranging removal of waste:

1) Contact waste provider for waste pick up;
2) Select the next available sequence number line in the register and record the request details;
3) Enter the request date and the details of the person requesting the collection. Do not record number of bags and weight at this time as these may change before collection occurs;
4) When the licensed contractor arrives, obtain a work order number before any waste is transported;
5) Select the next available sequence number line in the register and record collection details (date, # bags, total weight, tracking number, work order number and Telstra contact).

ACM Storage and Disposal Register									
#	Date DD/MM/YY	Total no. of bags	Total Weight (kg)	Project Number/ Work order/ Ref Number	Asbestos Recovery Address	State Waste Tracking	Name	Company Employee Number/ Identifier	Phone number
001									
002									
003									
004									
005									

ACM Storage and Disposal Register									
#	Date DD/MM/YY	Total no. of bags	Total Weight (kg)	Project Number/ Work order/ Ref Number	Asbestos Recovery Address	State Waste Tracking	Name	Company Employee Number/ Identifier	Phone number
006									
007									
008									
009									
010									
011									
012									
013									
014									
015									
016									
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018									
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