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Max Britton  
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NSW Ombudsman's Office  
Level 24-580 George St  
Sydney NSW 2000

21 April 2008

Dear Mr Britton

### **Occupational Hygienists – dealing with asbestos exposure incidents**

This letter is in response to your letter dated 26 March 2008 on the above topic. In that letter you raised four points seeking comment from the Australian Institute of Occupational Hygienist (AIOH).

In general the AIOH considers that only a person eligible to be a provisional or full member, including Fellow members, of the AIOH can call themselves an occupational hygienist. The following details the requirements for provisional and full membership of the AIOH.

#### **Provisional Membership**

An applicant may be considered for the grading of 'Provisional' where they meet the following conditions:

- To have a first degree or diploma in Science or Engineering acceptable to Council
- At the time application of membership is made to be working in the field of occupational hygiene or one of its specialist branches
- To have worked for at least one year in a professional capacity in the field of occupational hygiene or one of its specialist branches
- To demonstrate to the Council that an acceptable level of understanding of the basic principles of occupational hygiene has been achieved

**Full Membership** An applicant may be considered for the grading of 'Full' where they meet the following conditions:

- To have a first degree or diploma in Science or Engineering acceptable to the Council, or an equivalent qualification acceptable to the Council
- At the time application for membership is made to be working in the field of occupational hygiene or one of its specialist branches
- To have worked for more than five years in a professional capacity in the field of occupational hygiene or one of its specialist branches
- To demonstrate to the Council that they possess a satisfactory level of professional competence

#### ***1. Current training of hygienists for identifying, monitoring and dealing with asbestos***

Currently there is no formal training for occupational hygienist on asbestos matters in NSW.

The AIOH requires that a provisional or full member have a degree or diploma in Science or Engineering. Training after this qualification has traditionally been in the form of "on the job" training. Usually a trainee occupational hygienist under the mentorship of an experienced occupational hygienist learns the skills required to be an occupational hygienist in the field of the mentor unless additional training, external to the mentor, is received. This has been how the vast majority of occupational hygienists have been trained.

There has been limited academic training for occupational hygienists. The AIOH has a system of accrediting courses that when successfully completed meet the educational requirements for full membership. Currently only one post graduate, university based, course is accredited by the AIOH. Academic courses cover the general principles of occupational hygiene which includes asbestos but it would make up a small component of the course.

Last year the AIOH ran a one day Asbestos Seminar as part of its ongoing education program for members. This seminar was presented across Australia and was very well attended, especially in NSW. The feedback from this seminar was that there is a need for further education on asbestos issues.

The ACT Asbestos Task Force has developed a training program for licensed Asbestos Assessors. This training program does not cover the range of duties and depth of knowledge an occupational hygienist needs in regard to asbestos but it does provide a basic training program for inexperienced people working as occupational hygienist.

The AIOH is of the opinion that any training that improves the knowledge of occupational hygienists in the area of asbestos will be of benefit of the profession and the community.

## **2. Accreditation**

The AIOH currently has a Certification Scheme for its members. This scheme is internationally recognised by the International Occupational Hygiene Association. Once certified an occupational hygienist can use the title Certified Occupational Hygienist (COH). Earning the title of a COH is recognition of the highest level of professional expertise by the AIOH and international agencies. COH also recognises continued maintenance and further development of professional expertise via a points maintenance system.

The AIOH is of the view that the COH Certification scheme may be a suitable alternative to accreditation. Applicants for certification are assessed under three criteria to demonstrate competence. These are knowledge, experience and verification (written and oral examination). Applicants for certification also must provide evidence of five years of professional experience. This evidence is provided through a detailed work history. Successful applicants are required to continue to develop and enhance their professional occupational hygiene knowledge and skills for the duration of their active careers. The COH is required to submit information for review every 5 years to ensure this occurs.

The AIOH, in principle, does not oppose the accreditation of occupational hygienists in the field of asbestos. The detail of any accreditation scheme would have to be seen before the AIOH gives its endorsement.

## **3. The feasibility of licensing hygienists**

There are currently around 134 AIOH members (all grades) in NSW. Of these 41 members have self nominated themselves as consultants in the field of asbestos. There are also a large number of people working in the field that are not members.

Compared to other licensing schemes in NSW, such as the Certificates of Competency Licence issued by WorkCover NSW, the number of occupational hygienist to be licensed would be very small, probably around 100 in NSW.

With any licensing or accreditation system the issue of assessment of competence has to be addressed. Most training programs assess the competence in regard to the legislation and Codes of Practice. There is no assessment of the application of this information or the techniques used to draw conclusions based on site information.

The AIOH, in principle, does not oppose the licensing of occupational hygienists in the field of asbestos. The detail of any licensing scheme would have to be seen before the AIOH gives its endorsement.

#### ***4. The effectiveness or otherwise of current legislation relating to asbestos incidents***

The AIOH considers the current legislative framework for asbestos in NSW to be effective. The legislation deals with asbestos by using both a risk management approach and prescriptive requirements. The WorkCover NSW publication "Working with Asbestos" provides additional information on how to manage asbestos. This publication also supports the National Codes of Practice called up by the Occupational Health and Safety Regulation, 2001.

#### ***5. Other comments***

Currently asbestos air monitoring samples must be analysed by a laboratory accredited by the National Association of Testing Authorities (NATA). The WorkCover NSW publication "Working with Asbestos" states that the analysis of suspected asbestos containing material (ACM) should be analysed by a NATA accredited laboratory.

The AIOH is of the view that this requirement should be strengthened by including the requirement for the analysis of suspected ACM by a NATA accredited laboratory in the OHS Regulation. The Victorian Occupational Health and Safety Regulation, 2005 has this requirement as mandatory.

Such an inclusion into the Occupational Health and Safety Regulation will ensure that ACM are analysed by analysts assessed as competent in asbestos analysis by a third party and their organisation is conducting the analysis in accordance with the Australian Standard, have the appropriate equipment and have an audited laboratory quality management system in place.

Should you require further assistance in this matter please contact Gary Rhyder on (02) 9418 9151 or by email: [gary.rhyder@pickford.com.au](mailto:gary.rhyder@pickford.com.au).

**Dr Geza Benke**  
**President**