

# Submission to the Safe Work Australia Asbestos Framework Review

Lung Foundation Australia  
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**Our vision is healthy lungs for all**

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# About Lung Foundation Australia

For more than 30 years, Lung Foundation Australia (LFA) has walked alongside people living with lung disease and lung cancer, helping them navigate some of life's hardest moments with care, knowledge and hope. We provide trusted support through our nurses, peer support programs and social workers. We fund research that leads to better treatments. We speak out for people who need lung health to be taken seriously. Everything we do helps protect the gift of breath, so that more Australians can breathe easier, live well and feel less alone.

## Responses to the Discussion Paper

LFA is a national leader in the prevention and support of occupational lung diseases. Our work spans advocacy, research, information sharing, awareness raising, and the delivery of support services. Funded by the Department of Health and Aged Care, we are delivering key elements of the National Dust Disease Taskforce recommendations. This includes a national annual prevention and awareness campaign that reaches workers in high-risk industries and encourages proactive conversations with medical practitioners about lung health. We also operate a national telephone-based support service, providing trusted information and practical assistance to people living with occupational lung disease. We have also developed a series of national research priorities for occupational lung diseases, including occupational lung cancers, strongly associated with asbestos exposure.

Despite a national asbestos ban in 2003, asbestos-related disease remains a significant public health burden in Australia. On average two people are diagnosed with mesothelioma in Australia each day, with nearly 700 deaths annually. It is estimated that 4,000 Australians die annually from asbestos-related diseases, including asbestosis, mesothelioma and asbestos-related lung cancer. This is driven by ongoing exposure to legacy asbestos in homes, workplaces and the built environment. Drawing on our extensive experience engaging at-risk workers and translating complex health risks into clear, actionable information, our submission focuses on strengthening worker education, training, and competency as critical mechanisms for preventing asbestos-related disease. We welcome the opportunity to contribute to the 2026 Safe Work Australia Asbestos Framework Review.

Our response to the discussion paper is itemised below based on the questions within the paper that are relevant to LFA's area of expertise within occupational respiratory diseases, and the prioritisation of safe working conditions for the good lung health of all Australians.

### Topic 3.6 – Asbestos training and competency

#### **25. Should nationally accredited asbestos awareness training be mandatory within the model WHS framework for workers likely to encounter asbestos, and should it be embedded in Vocational Education and Training (VET) trade qualifications? Why/Why not?**

Recognising the considerable value of industry-led qualification models, LFA strongly supports the integration of industry-designed training modules such as asbestos awareness into accredited training packages and qualifications. The VET education model is particularly well suited to hands-on, industry-developed and industry-led training that draws on lived experience and applied nationally for

consistency. This approach reinforces the importance of safe work practices through instruction from respected industry experts and strengthens a top-down culture of respect for workplace safety.

We strongly support an accredited asbestos awareness training that would be mandatory for workers in industries likely to encounter asbestos and embedding it within relevant VET training packages and qualifications. It would ensure consistent minimum level of knowledge across jurisdictions and ensure workers who enter these industries are equipped with clear and adequate safety knowledge, rather than relying on variable worksite-based training. Embedding asbestos awareness training in VET training packages and qualifications ensures this knowledge is in place from the outset and delivered by industry-experts in safe environments.

Embedding this safety training is vital at the outset of an industry career, particularly as apprentices are among the most vulnerable groups in the workforce. As they enter unfamiliar working and social environments, they are required to navigate new processes, procedures, materials, hazards, and in some cases, dangerous tools and equipment. Some apprentices may also face additional barriers to full participation, such as young age, limited workplace experience, or language challenges that can increase their exposure to harm. Early, mandatory asbestos awareness training within VET qualifications provides an equitable and effective way to protect workers by ensuring they are equipped with essential knowledge on how to recognise asbestos risks and what action to take if asbestos is encountered.

Whilst LFA stresses the importance of embedding asbestos awareness training into relevant VET training packages and qualifications, we do not recommend it replace the specialist training or licences required to undertake asbestos handling or removals.

## **26. Do you support adopting the Australian Capital Territory (ACT) approach to asbestos awareness training in the model WHS Regulations? Why or why not?**

LFA supports adopting the ACT approach to asbestos awareness training within the model WHS Regulations. The ACT approach provides a clearer and more comprehensive framework for ensuring workers receive mandatory, nationally recognised training.

Not all workers who may encounter or be exposed to asbestos in the course of their duties hold, or are required to hold, a VET qualification to undertake their work (for example, labourers on domestic construction sites). The adoption of the ACT model provides an opportunity to review existing industry practices and address this inequity by capturing pathways beyond VET trade qualifications alone, including workers who may enter these industries through other routes. Through industry consultation, this can be achieved via the comparable development of a declared list of occupations, ensuring all relevant workers receive consistent asbestos awareness training to support strong lung health.

Additionally, the adoption of the ACT model in the model WHS Regulations would help to increase training coverage and improve confidence that all workers likely to encounter asbestos are appropriately informed and prepared. It also lends itself to the development of a strong consistent compliance mechanism.

## 27. What additional training gaps or challenges do you think need attention?

Exposure to asbestos fibres can have profound and lasting physical and psychosocial impacts, including effects on mental health, reduced capacity to work, and significant strain on personal relationships. To reduce these harms, LFA recommends to Safe Work Australia for consideration the following additional areas that would support Australian workers who may encounter asbestos during the course of their work.

### ***Culturally appropriate asbestos awareness training resources***

LFA acknowledges health, safety and education materials can be complex, and for those whose first language is not English, there can be added layers of difficulty in understanding how to protect your lung health at work. Training resources must be designed to meet the needs of the workers it is intended to protect, and not create additional barriers for workers to protect themselves.

Consideration should be given to the development and delivery of asbestos awareness training and/or resources that are accessible across languages, to prevent increased health risks arising from inaccessible education materials for at-risk workers.

### ***Regularity of asbestos awareness training***

LFA acknowledges that not all workers who meet the generic definition of 'likely to engage with asbestos' would do so on a regular basis, it is probable that those encounters would be intermittent rather routine. This raises some concerns around the capability for workers to recall all the relevant health and safety precautions when engaging with asbestos, particularly if there has been sometime between the training and their encounter.

To address those risks, we would recommend that mandatory asbestos awareness refresher training be undertaken every 2 to 3 years. Utilising the above identified VET asbestos awareness training module for the refresher training would ensure a nationally consistent approach. Refresher training supports knowledge retention, reinforces safe recognition and response behaviours, reduces the risk of complacency over time and ensures training is supported by the most up to date evidence for harm reduction.

### ***Mandatory demonstration, testing and fit of respiratory protective equipment (RPE)***

As identified above, some of our most vulnerable workers are apprentices, and they can face an elevated risk of exposure based on their inexperience. For some, this exposure can lead to the development of occupational respiratory diseases that may not emerge until many years after exposure has ceased due to long latency periods. As such, LFA recommends regulating the demonstration, testing and fit of personal protective equipment (PPE), specifically respiratory protective equipment (RPE).

All work environments that require the use of RPE should be demonstrated and tested in a practical environment to protect workers from asbestos exposure, not just via electronic demonstration. RPE fit testing also provides an important opportunity to educate workers on correct use, maintenance, and cleaning of their equipment. The equipment demonstrations should be prioritised for correct wearer fit, for all mask types and use, and no longer be a digital tick-box formality.

### **Asbestos awareness training opportunities outside of formal qualifications**

As noted above, there are a contingent of workers who may encounter or be exposed to asbestos during the course of their employment who may not undertake formal qualifications where health and safety training is a requirement. In the instance the ACT model (or similar approach) is not adopted, consideration must be given to this area of the workforce who are at risk of asbestos exposure and the significant adverse effects of an asbestos related occupational respiratory disease.

Each Australian jurisdiction has developed a range of high-quality asbestos awareness and safety resources; however, there is no assurance that workers are aware of their existence or understand their relevance and application. Further work is required to ensure equitable access to asbestos awareness training across the workforce.

Thank you for the opportunity to contribute to the Safe Work Australia Asbestos Framework Review, particularly regarding education, training, and support for Australia's most vulnerable workers. We remain committed to raising awareness and preventing occupational respiratory diseases to protect the lung health of all Australians.

To discuss this matter further, please contact Paige Preston, General Manager of Policy, Advocacy and Prevention at [paigep@lungfoundation.com.au](mailto:paigep@lungfoundation.com.au).

Yours sincerely,



Mark Brooke  
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**Lung Foundation Australia**