

From: [Loek Munnichs](#)
To: [REDACTED]; [Asbestos Review](#)
Subject: RE: OCSE Asbestos Review / Presentation
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Hi [REDACTED]

I understand that the deadline for submissions for the “Management of asbestos in recovered fines and recovered materials for beneficial reuse in NSW” has been expired. However, I would still like to make the following submission on my personal title.

I have read the ALGA submission and can agree with the comments and suggestions provided by ALGA but would like to add the following to questions 7 and 9.

7:

In the Netherlands they have adopted a criteria of 100mg/kg but it is a weighted criteria whereby the concentrations of crocidolite and amosite will have to be multiplied by a factor of 10 compared to chrysotile as crocidolite and amosite are much more harmful.

9i):

The Dutch NEN 5707:2015/C2:2017, NEN 5897:2015/C2:2017, NEN 5896:2003 and NEN 5898:2015/C1:2016 should all be considered by the Review. This international standard is in my opinion far better compared to the Australian standards. In Australia we collect our samples using 10L buckets from test pits mostly dug by an excavator but by doing this we introduce a huge bias as bonded asbestos can visually be observed. This will provide a dilemma for the sampler as there is no guidance on what a representative sample is. Does the sampler put that piece of ACM that he observed in the testpit in his bucket or not?? Note that one piece of ACM the size of a 50c coin in a 10L bucket will exceed the HSL-A criteria. Samples that are too small have the consequence that the true asbestos concentration is a false negative or false positive and totally dependent on the coincidental/accidental presence/absence of asbestos containing material in the sample. If NSW was to go down the track of adopting a threshold, consultants, auditors, suppliers and end-users should have confidence that the investigation undertaken is representative and in accordance with solid guidelines (which we are lacking).

The Dutch method does not introduce that bias as all the sampled material will require inspection and sieving. I have attached a copy of one of their standard (5707:2015/C2:2017, albeit in Dutch but it can easily be translated into English). I have also attached a presentation that I provided to AHCA in October 2021 in which I compared the Australian method with the Dutch method.

I am also of the opinion that the sampler as well as the consultancy both need to be certified. These are discussions that should be held with our certification bodies such as EIANZ-CEnvP and CPSS and to a lesser extent the ACLCA. In the Netherlands there is a system where this has been implemented. It is an industry regulated system called BRL SIKB 2000. Protocols 1000, 1001 and 2018 are specific for location-inspection and sampling of asbestos in soil.

9ii):

The method adopted by the Dutch government is much more reliable as more material is being tested for. It is noted that in NSW (and Australia) we need a much more rigorous and reliable sampling methodology.

I hope my comments will still be considered by the Review and I am offering my help where needed.

Kind Regards,

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