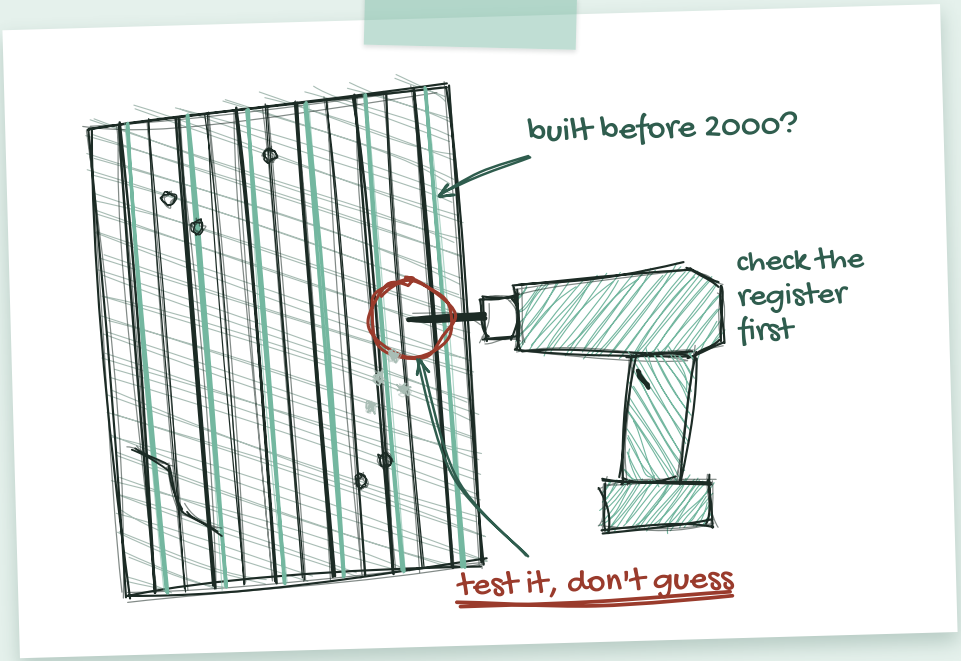
vimes consulting

Field guide 12



Asbestos

Finding it, managing it and removing it safely, in any building put up before 2000.

For middle managers and senior leaders in Aotearoa New Zealand

Health and safety field guide 12
Edition 2.3
Published 27 October 2026

The walls nobody mentioned

In August 2018, a demolition crew started pulling down an old building. It belonged to Bays Boating, a Motueka company that sells and services boats. Nobody had told the crew that the walls still held asbestos.

A licensed removalist, a business licensed by WorkSafe to remove asbestos, had taken asbestos off the roof only. Its clearance certificate, which says an area is safe to go back into, noted suspected asbestos in the outside walls. The redevelopment company running the job believed all the asbestos was gone, and hired a demolition company.

Bays Boating didn't tell the workers that asbestos remained. They had no protective equipment and nothing to control the fibres. The waste wasn't disposed of lawfully. The bare ground was then left for about two months.

What the story shows

The warning was there, in writing, in the company's own certificate. It never reached the people holding the tools.

Why this guide starts here

WorkSafe calls asbestos "New Zealand's number one workplace killer". Around 220 people die each year from asbestos-related disease. Most of them breathed the fibres in many years ago.

The risk today is disturbing asbestos that is still in buildings, during repairs, refits and demolition. This guide is about getting what you know to the person about to drill. Page 13 tells what the court decided.

The warning was in the paperwork. It needed to be in the crew's hands.

Sources WorkSafe court summary, Bays Boating Limited; media release, Mismanagement of asbestos removal unacceptable (7 February 2020); WorkSafe, Asbestos Awareness Week.

About this guide

Who it is for

Senior leaders who own or manage buildings, and who approve refits, maintenance and demolition.

Middle managers who bring in contractors, plan maintenance and decide when work can start.

How to use it

Read pages 2 to 8 at your own pace. Use the path on page 9 whenever work is planned in an older building. Carry the pocket card on page 20. Write what you find on page 19. Key words are explained on page 21.

Field guide 1 explains the ideas behind the series. Field guide 10 covers other dusts, such as silica.

Finding your way

Before you start	2
The duty	4
Spotting asbestos	7
What good looks like	9
The duty in court	13
On the job	15
Questions and notes	18
Key words and sources	21

Reading these pages

- A taped card with footprints: something to try at work
- A small compass: the sentence or point after it is this guide's view
- A pink box with a red edge: what changes from 1 April 2027
- The foot strip: sources. Untinted tables, sketches and checklists are this guide's own
- A hatched edge with a compass: this guide's own view
- A tinted box: the law, WorkSafe guidance or court facts
- A dark box: this guide's lessons from a court case
- Priority dots (this guide's rating): one means watch, three means act today

In this guide, "the Act" means the Health and Safety at Work Act 2015, "s" means section and "ss" means sections. "The Asbestos Regulations" means the Health and Safety at Work (Asbestos) Regulations 2016, and "reg" means regulation. A PCBU is a "person conducting a business or undertaking", usually an organisation. This guide gives general information. It is not legal advice. Written to the plain language standard in the Plain Language Act 2022 (s 5).

What the law asks

If you manage or control a workplace, you must find the asbestos, show where it is and plan how to manage it.

Rule	What it asks of you
Identify it reg 10	Identify all asbestos that creates a risk, so far as is reasonably practicable (what you can reasonably do, once you weigh up the risk, what you know, and the controls that exist, s 22). If you can't identify a material but believe it is asbestos, "assume that the material is asbestos".
Test it properly reg 11	You can get a sample analysed. It must go to an accredited laboratory.
Show where it is reg 12	Make sure the presence and location of asbestos "are clearly indicated".
Write a plan reg 13	Prepare a written asbestos management plan for the workplace.
Keep the plan current reg 14	Review it at least every 5 years. Review it after a control changes, or after anyone removes, disturbs, seals or encloses asbestos. Review it if the plan stops working, or if a health and safety representative asks.

Unknown is not the same as safe

WorkSafe says "the only way to confirm that something is asbestos is to test a sample of it".

Until then, treat "we don't know" as "yes".

Sources the Asbestos Regulations, regs 10 to 14; WorkSafe, Managing asbestos in your building or workplace, s 5.12.

Before a refit or demolition

Extra rules apply to structures and plant built or installed before 1 January 2000.

Rule	What it asks of you
Inspect first **regs 19, 20**	Don't start demolition or refurbishment until a competent person has inspected the structure or plant for asbestos.
Remove it first **regs 21, 25**	Identify and remove asbestos that the work is likely to disturb, before the work starts.
Use the right licence **regs 54, 56**	Class A for friable (flaky or powdery) asbestos, in any amount. Class B (or A) for more than 10 m^2 of non-friable asbestos, bonded into another material such as cement, counted across the whole project.
Small jobs **reg 27**	A trained, competent person may remove up to 10 m^2 of non-friable asbestos without a licence.
Notify WorkSafe **reg 34**	The licensed removalist must give WorkSafe written notice at least 5 days before starting. The regulation says days, not working days.
Get clearance **regs 41, 42**	After licensed removal, an independent inspection. Get the clearance certificate before anyone goes back in.

Count the whole project

The 10 m^2 limit adds up across the whole project for the site. Three "small jobs" on one site can add up to licensed work.

Sources the Asbestos Regulations, regs 19 to 21, 25, 27, 34, 41, 42, 54, 56.

Asbestos in the new law

From 1 April 2027, asbestos work becomes a listed critical risk. A critical risk is a risk the law lists, or one likely to cause death or serious harm (new s 22A). (The Amendment Act became law on 9 July 2026.)

Six asbestos entries in the new list

New Schedule 1A lists "working with asbestos", "airborne asbestos", equipment use, demolition or refurbishment of older structures, "asbestos removal work" and "asbestos-related work".

Small businesses too

A small PCBU has fewer than 20 workers. If numbers go up and down, it is small if it expects fewer than 20 workers in at least 9 months of the financial year (new s 17(3) to (5)). Small PCBUs must still manage critical risks in full, and asbestos is one (new s 25A). So the corner shop in a 1970s building must manage its asbestos too.

The Asbestos Regulations stay. Schedule 1A points to the Asbestos Regulations.

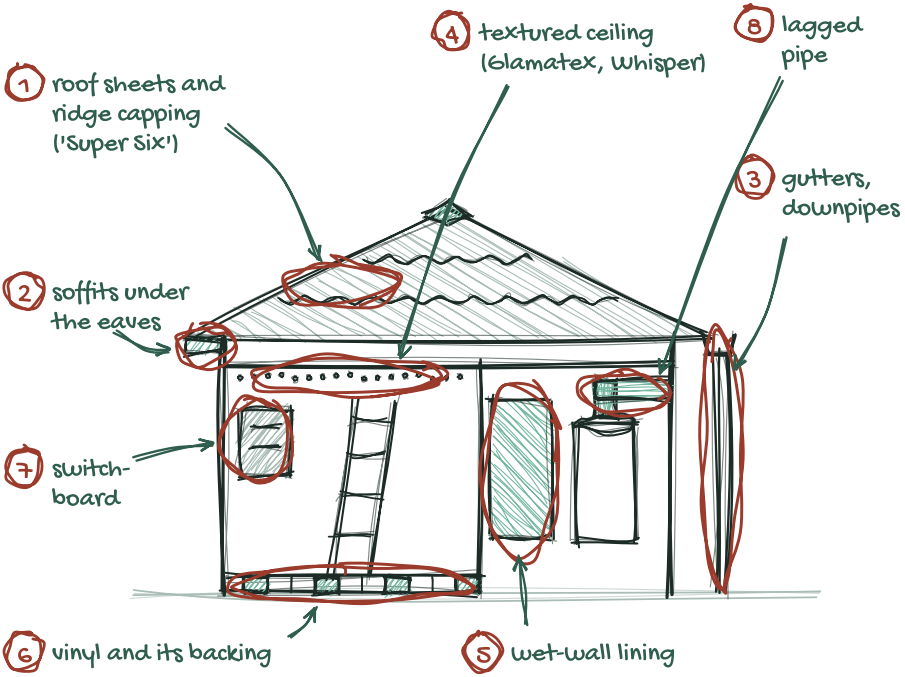
Getting ready

- [ ] List every building you own, lease or work in that was built before 2000.
- [ ] Find each one's register and plan. Check the plan was reviewed in the last 5 years.
- [ ] Pick one job planned for this quarter. Walk it through the path on page 9 with the person running it.
- [ ] Ask a regular contractor where they look for the register: the list of all identified or assumed asbestos in the building.

Sources the Health and Safety at Work Amendment Act 2026 (new ss 17(3) to (5), 22A, 25A and Schedule 1A); WorkSafe, Understanding the changes to health and safety law (July 2026); Am I a small or large PCBU? (September 2026).

Where it hides

WorkSafe says: "If your building or workplace was built before 1 January 2000, it probably contains some asbestos materials."



You can't tell by looking. WorkSafe says cement with asbestos "can look identical to cement that does not contain asbestos". Use this page to know where to ask, not to decide.

The numbers match the table on the next page. WorkSafe lists many more places, from toilet cisterns to fence panels.

Sources WorkSafe, Where asbestos can be found; Asbestos in the home (July 2024); Working with or near asbestos (April 2026), table 2.

Eight places to check

	What it looks like	Why it matters, and what to do	Priority
1	Cement roof sheets and ridge capping, such as "Super Six".	Weather and algae wear it down. Check before anyone cuts, drills or water-blasts it.	●●○
2	Soffits and cladding, including baseboards.	Drilled for lights, cables and alarms. Check the register before any fixing.	●●○
3	Cement gutters and downpipes.	Often broken during repairs. Treat as asbestos until tested.	●○○
4	Textured ceilings, such as Glamatex or Whisper.	Electricians and data cablers drill here. Check before anyone goes into the ceiling.	●●●
5	Wall linings in kitchens, bathrooms and laundries, and backing behind tiles.	Refits break these out. Get them tested before demolition starts.	●●○
6	Old vinyl or lino, and the paper backing under it.	Lifting or sanding it disturbs the backing. Test before you lift.	●●○
7	Backing to the switchboard or meter board.	Electricians work right on it. Tell them before they start.	●●○
8	Pipe lagging, water heater insulation, boiler gaskets.	If it is flaky or powdery, only a Class A removalist may remove it. Keep people away if it is damaged.	●●●

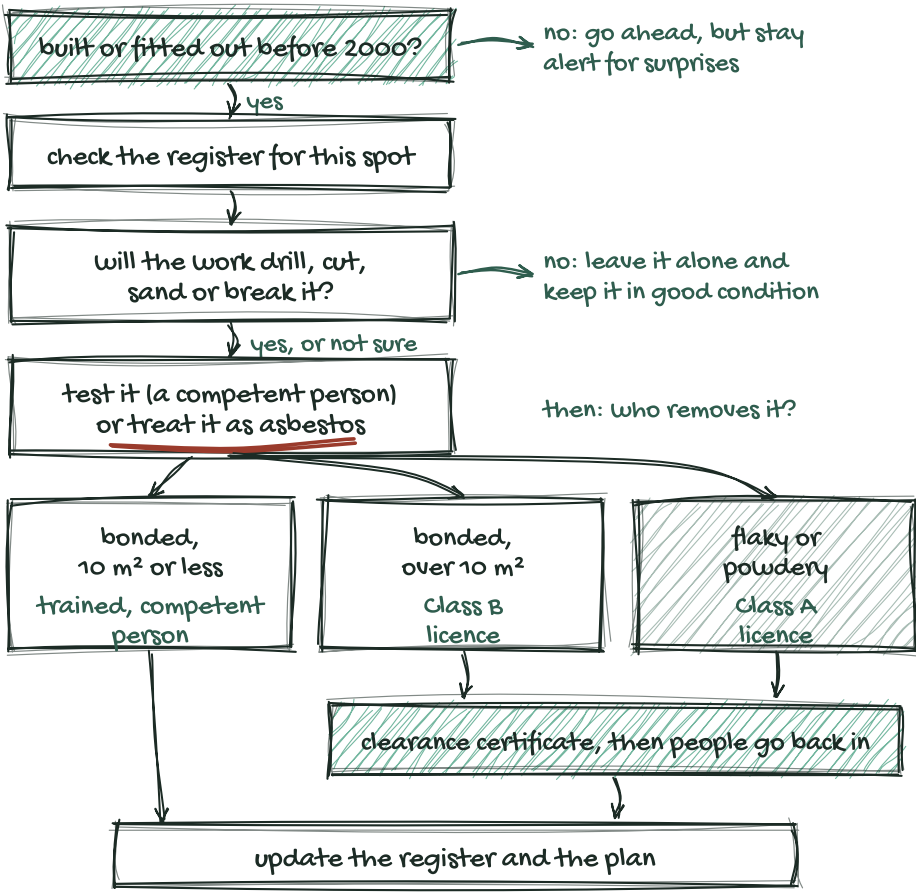
Damaged means act now

WorkSafe says fibres are more likely to escape when material is "flaking, peeling, or crumbling". If anything on this list is damaged, act now, whatever its dots: keep people away and get advice.

Sources as page 7, and the Asbestos Regulations, reg 54.

Before anyone drills

New exposure often starts with a job nobody checked. This path takes two minutes, and it works for a single hole or a whole demolition.

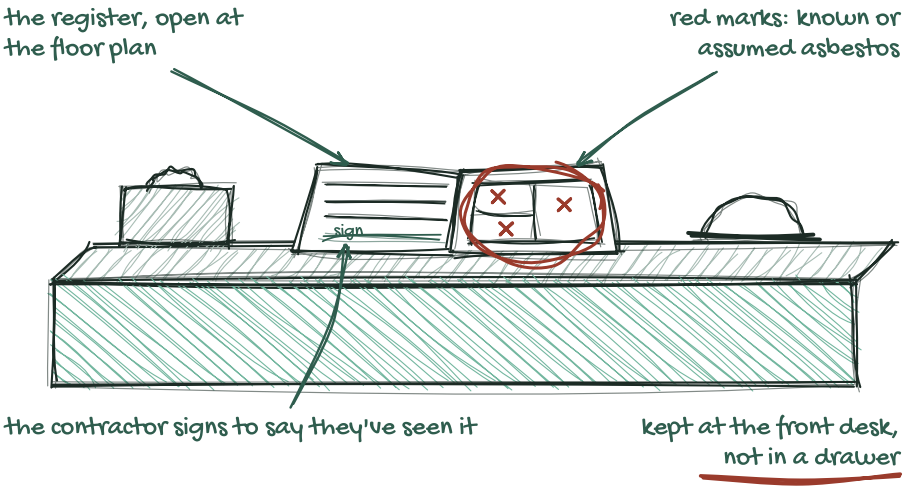


"Bonded" means non-friable. The 10 m² counts across the whole project (regs 27, 56). Clearance follows licensed removal (regs 41, 42).

Sources the Asbestos Regulations, regs 10, 19 to 21, 27, 41, 42, 54, 56; WorkSafe, Asbestos in the home.

A register people use

WorkSafe says bonded asbestos generally doesn't release fibres if it is in good condition and left alone. The risk comes when someone disturbs it without knowing.



Make it easy to find

- [ ] Keep it where contractors sign in.
- [ ] Mark it on a floor plan, not only in a list.
- [ ] Label asbestos on site where you can.
- [ ] Update it after every removal or new find.

Watch its condition

- [ ] Look at known asbestos on a set date each year.
- [ ] Flaking, peeling or crumbling? Keep people away and get advice.
- [ ] Add new finds to the plan.

Sources WorkSafe, Asbestos in the home (July 2024); Managing asbestos in your building or workplace; the Asbestos Regulations, reg 12.

Bringing in a removalist

When asbestos has to come out, six checks show you have hired the right removalist.

Check	Why
Look them up on WorkSafe's licence register.	The register shows if a licence is current, suspended, expired or cancelled.
Match the class to the job. regs 54, 56	Class A for friable asbestos. Class B covers non-friable only.
Ask when they will notify WorkSafe. reg 34	At least 5 days before licensed work starts.
Ask who supervises. reg 28	For Class A work, the supervisor is there the whole time. For Class B, nearby and readily available.
Agree who does the clearance. reg 41	Class A: an independent licensed asbestos assessor. Class B: an independent competent person.
Ask about health monitoring. reg 15	Their workers must start health monitoring within 4 weeks of starting licensed removal work.

Small jobs still need the right person

Up to 10 m² of bonded asbestos needs no licence. But the person doing it must be competent and trained in asbestos work (regs 17, 27).

Tell them everything you know

Give the removalist the whole register for the area, not just the part you want gone. Bays Boating asked for the roof only.

Sources the Asbestos Regulations, regs 15, 17, 27, 28, 34, 41, 54, 56; WorkSafe, Asbestos licence holder registers.

Someone just drilled into it

A cabler drills through an old ceiling. Dust settles on the desk below. What happens in the next hour matters most.



WorkSafe tells workers who disturb asbestos to "stop work immediately" and "keep all people away from the area". Close windows and doors and "shut off any HVAC systems" (heating, ventilation and air con). Then "advise the property owner or PCBU who controls the property as soon as practicable".

Don't clean it up with what is to hand. "Never use domestic vacuum cleaners to clean up asbestos dust. Do not use a broom to sweep up waste." Take off dusty outer clothing without shaking it, and double-bag it.

Then, as the person in charge

Get expert advice on how far the dust spread. A licensed removalist may need to clean up. Review your asbestos management plan, as the law requires after a disturbance (reg 14). Report it inside the business (field guide 5).

Sources WorkSafe, Working with or near asbestos (April 2026), ss 4.6, 9.1; Asbestos in the home (July 2024); the Asbestos Regulations, regs 13, 14.

The roof, but not the walls

Page 2 told what happened to the demolition crew. WorkSafe's summary shows how it got there, one step at a time.



March 2017
Bays Boating asks a removalist for a price.

May 2017
It hires a redevelopment company.

June 2018
It asks for the roof only.

August 2018
A demolition company pulls the building down.

The redevelopment company's work included demolition. Bays Boating said it would arrange the asbestos removal itself. The demolition went ahead without the controls the law requires.

The sentence

Bays Boating pleaded guilty. In February 2020 the Nelson District Court fined it $108,000. The maximum was $500,000. The charge was under ss 36(1)(a) and 49.

> "*It is unacceptable that Bays Boating Limited allowed a building containing asbestos to be demolished without having the asbestos removed first.*"
> **Robert Birse, WorkSafe**

The lesson for leaders

Read your own paperwork. The warning sat in a certificate the company had paid for.

Sources WorkSafe court summary, Bays Boating Limited; media release, Mismanagement of asbestos removal unacceptable (7 February 2020); the Act, ss 36, 49.

One demolition, two companies in court

In December 2017, Quick Earth Moving used two diggers to demolish a house in Point Chevalier, Auckland.

A wall fell onto the neighbour's driveway. It damaged their house and hit a gas terminal, causing a leak. Neighbours had to leave. The woman next door uses a wheelchair, and debris trapped her at the back of her property. Emergency services built a ramp to get her out. Asbestos was later found in the demolished materials.

The demolition company

WorkSafe said the company suspected asbestos but didn't manage it properly. It said "poor planning from the very start of the job left workers, neighbours and the community at risk". In September 2019 the Auckland District Court fined Quick Earth Moving $150,000. It ordered $30,000 reparation to the neighbours. The charges were under ss 36 and 48.

The project management company

WorkSafe also charged Dong SH Auckland Ltd, a project management consultancy on the same demolition. The company pleaded not guilty. The Auckland District Court convicted it in November 2022 and fined it $255,000, under ss 36(1)(a) and 48. Its appeal was dismissed in March 2024.

The lesson for leaders

Duties overlap. The company managing the project was convicted, not just the one driving the diggers. Field guide 3 covers shared duties.

Sources WorkSafe media release, Asbestos went undetected in botched demolition job (11 September 2019); court summaries, Dong SH Auckland Limited, and Dong SH Auckland Limited (appeal); the Act, ss 36, 48.

When the work changes

The same ceiling needs a different approach depending on what is happening around it. Field guide 1 explains why.

What is happening	How to manage it	Priority
Known, bonded asbestos, sealed and on the register Clear	Leave it alone. Check its condition. Show it to every contractor.	●○○
A planned refit or demolition Complicated	Competent inspection first. Licensed removal. Plan the clearance.	●●○
Many trades on site, near hidden materials Complex	Brief every trade. Check the register each day. Stop and test when unsure.	●●○
Someone drilled or broke it, or a storm exposed it Chaotic	Stop work. Keep people out. Get expert help. Follow page 12.	Act now
Nobody knows if it was tested, or where the register is Confusion	Treat it as asbestos. Find the register before work goes on.	●●○

Clear to Chaotic: one more hole

An electrician needs one more cable run. The register was checked for last month's job, not this one.

Complicated to Complex: "it wasn't in the survey"

Demolition uncovers material nobody listed. The programme is tight and the pressure is on to keep going. Stop, and test it.

Sources The situation names in colour come from the Cynefin framework (Snowden and Boone, 2007, who called Clear "Simple" and Confusion "Disorder"; current names from Snowden and Friends, 2021).

Signs worth a closer look

You can see or hear most of these on a walk round an older building. Each one is worth a question.

What you might see or hear	What to do	Priority
A tradesperson starting work before anyone has shown them the register.	Pause the job until they have seen the register.	●●●
Dust or debris under an old ceiling, wall or floor after work.	Keep people away. Treat it as asbestos until tested.	●●●
Sheets, lagging or ceilings that are flaking, peeling or crumbling.	Keep people away. Get it assessed.	●●●
"It's only a few holes."	A few holes still disturb it. Check first.	●●○
A refit, new cabling or new flooring in the plans.	Book the inspection before the work starts.	●●○
A plan older than 5 years, or nobody can find it.	Review the plan (reg 14). Name who keeps it.	●●○

The ceiling test

Stand in any room of an older building. Ask the person who runs the site what is above this ceiling, and under this floor. If the answer needs a trip to a filing cabinet, contractors won't get it either.

Sources WorkSafe, Asbestos in the home, for the condition wording.

Running the job

It's Friday afternoon. The data cabler needs four more holes through the ceiling, and the new team moves in on Monday. Nobody has opened the register.

Before work starts

- [ ] Check the register for every job that touches the building.
- [ ] Show contractors where asbestos is, on the plan.
- [ ] Check the removalist's licence class for any removal.

While work is happening

- [ ] Pause work when anyone finds a material they aren't sure about.
- [ ] Keep people out of removal areas.
- [ ] Keep power tools and water blasters off suspect materials.

Afterwards

- [ ] Get the clearance certificate before people return.
- [ ] Update the register and the plan.
- [ ] Report any accidental disturbance.

What to say at the ladder

"Show me on the plan where you're drilling, then go for it." Ask it every time. Soon contractors bring the plan to you.

Take these to your next meeting

Senior leaders and officers

- [ ] Which of our buildings were built before 2000?
- [ ] Does each have a current asbestos management plan?
- [ ] When was each plan last reviewed?
- [ ] Do contractors see the register before every job?
- [ ] Do refit budgets allow for testing and removal?
- [ ] Has asbestos ever been disturbed by accident here?
- [ ] Is asbestos on our critical risk list?
- [ ] As an officer, how do I check for myself that the register is shown and used before every job? (s 44)

Middle managers

- [ ] Where is the register, and is it up to date?
- [ ] Who is working in older parts of the building today?
- [ ] Has anyone found a material they weren't sure about?
- [ ] Is any asbestos damaged or crumbling?
- [ ] Does our removalist hold the right licence?
- [ ] Do we have the clearance certificate for the last removal?
- [ ] Who would people call if something got disturbed?

Two measures a board can track: jobs in pre-2000 buildings started without a register check; asbestos plans past their 5-year review.

Who here could tell a contractor, today, what is inside the wall they are about to cut?

Notes

Field notes

Back of your pocket card

My critical risks here:

Who to call:

ideas for this page:

- What the register says about this room
- a material you weren't sure about
- jobs coming up in older buildings
- who to call if it gets disturbed
- what a contractor told you

→ write it down here

Pocket card

Cut out and fold in half.

Before anyone drills

1. Built or fitted out before 2000?
2. Check the register for this spot.
3. Will the work drill, cut, sand or break it?
4. Not sure? Test it, or treat it as asbestos.
5. Removal: the right person or licence class.

No register? Treat it as asbestos.

If it's been disturbed

1. Stop work now.
2. Keep people out.
3. Shut doors and windows. Air con off.
4. Don't sweep or vacuum.
5. Tell the owner. Get expert help.

Take off dusty outer clothes gently. Bag them twice.

Card text from the path on page 9 and WorkSafe's steps on page 12. Field guide 12, Vimes Consulting.

Notes

Key words

The words people use around asbestos, in plain English.

Word	What it means
ACM	Asbestos-containing material: "any material or thing that, as part of its design, contains asbestos". reg 3
Friable	Flaky or powdery. The law says it can be "crumbled, pulverised, or reduced to a powder by hand pressure when dry". It releases fibres easily. reg 3
Non-friable (bonded)	Fibres bonded into another material, such as cement. WorkSafe says it generally does not release fibres if it is in good condition and left alone.
Asbestos register	WorkSafe says it "lists all identified or assumed asbestos in a building or workplace".
Asbestos management plan	A written plan for the asbestos in a workplace. It covers where it is, decisions about it, what to do in an incident, and who is trained. reg 13
Licensed removalist	A business licensed by WorkSafe to remove asbestos. Class A covers friable asbestos. Class B covers non-friable only. regs 54, 56
Clearance certificate	A certificate, after licensed removal, that the area is safe to go back into. regs 41, 42
Exposure standard	The most asbestos allowed in the air: 0.1 fibres per millilitre, averaged over 8 hours. Licensed assessors measure it by air monitoring. reg 4
Reasonably practicable	What you can reasonably do, once you weigh up the risk, what you know, and the controls that exist. Cost is weighed last. It can rule a step out only if it is grossly disproportionate to the risk. s 22
Critical risk	From 1 April 2027, a risk the law lists, or one likely to cause death or serious harm. Asbestos work is listed. new s 22A

Sources the Asbestos Regulations, regs 3, 4, 13, 41, 42, 54, 56; the Act, s 22; the Health and Safety at Work Amendment Act 2026, new s 22A; WorkSafe, Asbestos in the home (July 2024); Managing asbestos in your building or workplace; Asbestos licence holder registers.

Check it yourself

How this guide was checked

Every statement of law or fact in this guide was checked against a primary source before printing: the Act, the regulations, the Amendment Act 2026 as passed, WorkSafe guidance, or WorkSafe's case reports. Each check is recorded in a claims register, with the source and date checked. Statements that could not be checked were removed. Facts checked on 12, 22, 23 and 24 October 2026.

Law

1. Health and Safety at Work Act 2015, ss 22, 36, 44, 48, 49. legislation.govt.nz
2. Health and Safety at Work (Asbestos) Regulations 2016, regs 3, 4, 10 to 15, 17, 19 to 21, 25, 27, 28, 34, 41, 42, 54, 56.
3. Health and Safety at Work Amendment Act 2026 (became law on 9 July 2026): new ss 17(3) to (5), 22A, 25A and Schedule 1A.
4. Plain Language Act 2022, s 5.

WorkSafe guidance

5. Managing asbestos in your building or workplace; Where asbestos can be found; Asbestos Awareness Week; Asbestos licence holder registers.
6. Asbestos in the home, quick guide (July 2024); Working with or near asbestos, good practice guidelines (April 2026).
7. Understanding the changes to health and safety law (July 2026); Am I a small or large PCBU? (September 2026).
8. Media releases: Asbestos went undetected in botched demolition job (11 September 2019); Mismanagement of asbestos removal unacceptable (7 February 2020). Court summaries: Bays Boating Limited; Dong SH Auckland Limited; Dong SH Auckland Limited (appeal). worksafe.govt.nz

Research

9. Snowden, D. J., and Boone, M. E. (2007). A leader's framework for decision making. Harvard Business Review, 85(11), 68 to 76. The framework behind the situation names on page 15 (it called Clear 'Simple' and Confusion 'Disorder').
10. Snowden, D., and Friends (2021). *Cynefin: Weaving sense-making into the fabric of our world.* Cognitive Edge, The Cynefin Co. The current situation names.

Other guides that help

Asbestos work almost always involves contractors and older buildings.

Guide	Read it for
1	Leading health and safety, and why the same task needs a different approach in different situations.
2	Trust and verify. How to check the register and the pre-work check really happen.
3	Shared duties, when several businesses work on one building.
5	When things go wrong. Reporting and learning after a disturbance.
6	Critical risks and critical controls, in full.
10	Work-related health. Silica and other dusts, and health monitoring.

The whole series

1 Leading health and safety · 2 Trust and verify · 3 Shared duties · 4 Worker voice · 5 When things go wrong · 6 Critical risks and critical controls · 7 Vehicles, mobile plant and traffic · 8 Working at height · 9 Psychosocial risk and mental health · 10 Work-related health · 11 Hazardous substances · **12 Asbestos** · 13 Machinery, plant and energy isolation · 14 Remote, isolated and lone work

Sources

Asbestos in one minute

- A building put up before 2000 probably has some asbestos in it.
- You can't tell by looking. Test it, or treat it as asbestos.
- Bonded asbestos in good condition, left alone, generally doesn't release fibres.
- The danger is drilling, cutting, sanding and breaking it.
- Get the register to the person holding the tool, before they start.
- If it's disturbed: stop, keep people out, don't sweep, get help.

The field guides

1 Leading health and safety
2 Trust and verify
3 Shared duties
4 Worker voice
5 When things go wrong
6 Critical risks and critical controls
7 Vehicles, mobile plant and traffic
8 Working at height
9 Psychosocial risk and mental health
10 Work-related health
11 Hazardous substances
12 **Asbestos**
13 Machinery, plant and energy isolation
14 Remote, isolated and lone work

vimes consulting

vimesconsulting.com
Field guide 12, edition 2.3
Published 27 October 2026

© Vimes Consulting 2026. Free to share, unchanged, with credit.