ANNEX 2

A response from HSE’s Asbestos Policy Unit to the Report from WATCH Secretariat dated 26 November 2009

1. HSE asked WATCH to consider what, if anything, could be said about risk to health in relation to long term low levels of exposure to different asbestos fibre types. WATCH produced a statement of the current state of knowledge, especially the use of the Hodgson and Darnton 2000 model, and the difficult issues concerning extrapolation for exposure levels lower than the available epidemiological data. HSE highly values the work done by the committee and the statement provides a very useful summary of the current position.

2. The Report concludes with 3 key points. HSE notes, and agrees entirely with the first point about the continuing need to target builders and tradesmen. Over the past two years HSE, with partners, has worked to deliver the Asbestos ‘Hidden Killer’ awareness raising campaign. This highly successful campaign follows earlier similar initiatives. HSE will continue to build on this research based work through further projects, including targeting young learners and suppliers of RPE.

3. HSE agrees with the second point on simple clear targeted messages and believes that its promotion of ‘Asbestos Essentials’ as the key guidance, together with the list of precautions in campaign literature, in direct mail and promulgated via other means are precisely the clear and targeted messages requested by WATCH.

4. HSE would like to take your suggestion concerning specifying the types of work tasks most likely to give higher exposures further than you suggest and would encourage fresh work to monitor, record and review what current exposure levels are today for such tasks.

5. Point 3, WATCH recommended producing a tool leading to a control banding approach might be a viable way to give more easily understood guidance which could deal with the relative scale of potential risk in different situations.

6. Having considered the work done to date HSE has a number of concerns:-

- There are many underlying complexities, uncertainties and variables, significantly influencing the result/risk control band of the proposed tool.

- There appear to be very limited exposure control options for ‘long term low level exposure.’

- There are unlikely to be new additional practical control measures which could be realistically recommended.
- HSE’s attitudinal research casts serious doubt on uptake of the proposed tool by those most at risk.

7. ‘Work’ tasks are already regulated by comprehensive current legal requirements and guidance. Control Banding outcomes are likely to link to the pre-existing ‘Asbestos Essentials’ or other guidance. HSE’s current effort is to raise general awareness levels of asbestos risks and correct basic non compliance rather than to produce more refined guidance. We therefore conclude that a control banding tool for levels above 0.01 fibre/ml.year is not a priority for HSE/HSL. This does not prevent others taking this work forward if they wish to resource it. HSE is hopeful that other current ongoing commissioned research may well cast more light on current low level exposures in due course.