



Education International
Internationale de l'Éducation
Internacional de la Educación
Bildungsinternationale



ETUCE – European Trade Union Committee for Education
Education International - European Region

President
Larry FLANAGAN

Vice-Presidents
Odile CORDELIER
Andreas KELLER
Trudy KERPERIEN
Dorte LANGE
Branimir STRUKELJ

Treasurer
Joan DONEGAN

European Director
Susan FLOCKEN

ETUCE-CSEE
Boulevard Bischoffsheim 15
1000 Brussels | BELGIUM
secretariat@csee-etu.org
+32 2 224 06 92

ETUCE Position on asbestos screening, monitoring, and registering

Adopted by the ETUCE Bureau on 7 February 2023

Background:

As part of its [Work Programme for 2023](#), the European Commission is expected to propose - in the second quarter of 2023 - a legislative measure covering mandatory asbestos screening, monitoring, and national asbestos registers. The specific objectives of the initiative are to (1) gain comprehensive evidence about the presence of asbestos in buildings; (2) make this information available through registries that would be (3) the basis for the safe removal of asbestos, taking into account the risks to air pollution.

The initiative addresses the recommendations put forward by the European Parliament on its Resolution ([2019/2182\(INL\)](#)) on protecting workers from asbestos. Besides, the measure is in line with the long-standing demands from education trade unions on improving protection of education workers from exposure of asbestos in education institutions. The initiative is currently subject to [public consultation](#) open until 8 February 2023, to collect the views of relevant stakeholders in preparation for the initiative.

In order to inform the contribution to the public consultation, in January 2023, the ETUCE Secretariat conducted a survey among all ETUCE member organisations** to gather up-to-date information regarding asbestos screening, monitoring and registering across Europe. To date, ETUCE collected feedback from member organisations in 10 countries (Belgium – Flemish-speaking region and French-speaking region -, Czechia, France, Germany, Ireland, Italy, the Netherlands, Portugal, United Kingdom) whose view is integrated within this position.

Despite efforts to improve the health and safety in the education sector, the exposure of education workers to asbestos in education institutions continues to pose an unacceptable threat to the health and safety of education workers and students, amid a European context of shrinking attractiveness of the teaching profession and unprecedented shortage of teachers and other education personnel.

In this view, ETUCE welcomes the upcoming European Commission's initiative on asbestos screening, monitoring, and national asbestos registers. Despite being a cross-sectoral initiative, this initiative is particularly important for the education sector as it has the potential to improve protection for education workers exposed to asbestos and



contribute to enhance the attractiveness of the teaching profession. Therefore, ETUCE believes that certain considerations must be taken into account to ensure that the initiative effectively protects health and safety in the education sector.

In general, ETUCE considers this initiative a crucial step towards gaining comprehensive evidence about the presence of asbestos in education institutions and improving transparency and access to information on asbestos in the education sector. Nevertheless, it is important that mandatory screening, monitoring and registering of **asbestos does not replace the legal responsibility of employers** in the education sector to conduct a **regular risk assessment** in the workplace, as established by the EU *Occupational Health and Safety Framework Directive* ([Article 9.1](#)).

In line with the provisions of the EU OSH Framework Directive, ETUCE emphasises the importance of continuous **consultation with education trade unions** in the process of asbestos screening, monitoring and management in education institutions, as essential to ensure that the rights and health of education workers are protected.

Besides, the initiative must be designed in a way that **does not diminish the relevance of the Directive on asbestos** - which is currently being updated – and is in line with the **precautionary principle** of occupational health and safety.

ETUCE further demands that the Commission enlarges the scope of the initiative to include other fibrous silicates responsible for occupational cancers.

Regarding the asbestos screening:

In its call for evidence, the European Commission considers two different policy options: a non-legislative action and a legislative proposal. **ETUCE supports that a legislative proposal is to be preferred over the non-legislative initiative** to improve the health and safety of education workers throughout Europe. Indeed, if well designed, a legislative measure is crucial to **reducing disparities and different standards** among member states and **improving enforcement** of adequate asbestos screening, monitoring, and registering in the education sector. Nevertheless, ETUCE underlines that the initiative must not undermine existing higher standards at national and regional levels in some member states. As in many countries, the presence of asbestos remains unknown or inaccessible to education trade unions, education workers, and students exposed to the contamination with asbestos, this initiative is also important to enhance **transparency and access to information** as the prerequisite for the safe removal and management of asbestos in education institutions.

ETUCE supports the structure of the legislative policy option proposed by the European Commission with some remarks. Regarding the criteria that the European Commission proposed to identify the building for the screening, ETUCE stresses that all education institutions must be subject to the mandatory asbestos screening, regardless of if they are public or private buildings. Ensuring that asbestos presence is screened and monitored in every single education institution at all levels of education is even more crucial in view of the expected increase of renovations in the framework of the European Green Deal and the Renovation Wave Strategy. Besides, the **obligation** for asbestos screening must **apply to all education institutions that do not possess a certification** stating the absence of asbestos, **regardless of their date of renovation**.

The asbestos screening must **exclusively be commissioned to certified operators**. The process must include a diagnosis adapted to the characteristics of the education institutions.

As for the proposal of the European Commission to link asbestos screening to economic transition or other pivotal moments in the life, ETUCE points out that the **asbestos screening, and monitoring must be dynamic**. This means that asbestos screening must be conducted **regularly** with a mandatory time limit of at least once a year, and it must be **updated** to **reflect changes** in asbestos-containing material (e.g., weathering, damage, removal).

In addition, it is important that the Commission's initiative define minimum standards on the **type of information to collect** through the asbestos detection, including the location of contamination, and the estimation of the quantity for asbestos-containing materials.

Regarding the monitoring and the set-up of asbestos national registries:

The Commission's initiative must include **minimum standards** for national or regional registries while ensuring sufficient flexibility for member states to adapt to their national or regional circumstances. **The format** of the registries **must be digital** to ensure adequate accessibility of information, exchange of information, and common data analysis.

The minimum information available in the registry must include:

- a) **Type of building or infrastructure** (e.g., private, public, etc.), including a specific category for education institutions. This is, indeed, essential to have a clear picture of the presence of asbestos in education institutions;
- b) **Specific location of asbestos** (inside/outside, floors, walls, ceilings, roofs etc.);
- c) **Year of construction** (before/after national asbestos ban);
- d) **Type of material** (asbestos cement, insulation, putty etc.) **and amount**;
- e) **Works to be conducted** (repairs, removal, etc.), **and the work methods** (drilling, cutting etc.);
- f) **Duration of the planned work**, a **timeline** for asbestos removal, and a management plan.

Furthermore, the registries must be set in a clear and user-friendly manner through a centralised digital database or a building-specific "logbook". Besides, the registries must be widely accessible, particularly to education workers, education trade unions, and education authorities, as well as to students and parents. In addition to access to the registry, **education workers** must also have **the right to be informed of the presence of asbestos in their workplace at the beginning of the work-relation** or as soon as the presence of asbestos is detected.

ETUCE emphasises that the legislative proposal on asbestos screening, registering, and monitoring must include effective measures for effective **enforcement** to hold member states accountable for implementing the asbestos screening, registering, and monitoring of asbestos, including through enhanced cooperation with national labour inspectorates. These measures must also include **sanctions** to address the cases of non-compliance promptly.

**The European Trade Union Committee for Education (ETUCE) represents 127 Education Trade Unions and 11 million teachers in 51 countries of Europe. ETUCE is a Social Partner in education at the EU level and a European Trade Union Federation within ETUC, the European Trade Union Confederation. ETUCE is the European Region of Education International, the global federation of education trade unions.*