



Recently scanning through the HSE web communities forum, my interest was peaked by the title 'Decorative Coatings - Am I missing Something?'. Challenge accepted!

Clicking on the link (<https://webcommunities.hse.gov.uk>) the main tenet of the question was what is considered large scale work. Various contributors started pointing toward Asbestos Essentials A28, using the 1sqm as an example of 'small scale works', inferring that anything greater than that 1sqm is 'Large Scale'. In my considered opinion this stance doesn't stand unto much scrutiny.

The first thing to consider is that Asbestos Essentials is designed to help "small businesses, sub-contractors and the self-employed to comply with the Control of Asbestos Regulations 2012" and help them in deciding whether their own staff should attempt a one-off project or whether to bring in more specialised contractors.

Asbestos Essentials A28 uses the 1sqm as an example of a small area from which Textured Coating (TC) can be removed from a substrate, prior to other maintenance work, and not an example of 'small scale works' in terms of wholesale removal. In terms of risk removing plasterboard with a textured coated finish, in its entirety, is a different proposal to scraping loose/flaking artex off of concrete, for instance (image above). In the same document, task sheet A14, allows for removal of Asbestos Cement (AC) sheets on a small scale. The small scale is dismantling of a small structure (e.g. shed or garage), as long as AC stays intact during removal. Which, I think everyone would agree, in terms of potential for fibre release, is a different ball park to the aforementioned removal of textured coated plasterboard.

I recall around 1996, when TC was still categorised under the asbestos (licensing) regulations (ASLIC) 1983 (as amended). I successfully made the point to a HSE inspector on a demolition project. The only Asbestos Containing Material (ACM) present at a Council run Elderly Persons (Care) Home was TC ceilings on plasterboard. The Council were facing a bill upward of £50,000 for the TC removal prior to the demolition proper. My point was that, based on risk v's benefit, if the Council were spending >£50,000 on asbestos removal, it would be better spent on removing Asbestos Insulating Board from schools. Happily the HSE inspector agreed with me and the removals were downgraded from requiring a full enclosure. We settled on removal carried out by Licensed contractors i.e. individuals used to following good work practices with proper disposal, reducing the costs to about £15,000. I guess we were leaning in the right direction because a couple of years later TC was recategorised and removed for ASLIC.

I added to the responses on the forum, hoping that others might find this perspective helpful. Quite often I find forums turn into an echo chamber, with contributors reinforcing the same views, until everyone pats themselves on the back, and move on carrying a misunderstanding.