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Dear Madam, dear Sir,

Despite the ban on its production and use in the EU, asbestos continues to pose a significant threat to workers in the construction sector and the European public in general. This is particularly the case when conducting works on the building stock dating back to the heyday of asbestos use in Europe, which is reaching an age when it increasingly requires renovation. At the European Federation of Building and Woodworkers (EFBWW), recognized partner in the European Social Dialogue, we see in this both a challenge and an opportunity. Indeed, we recognize a significant complementarity between the European Commission's policy on energy performance in buildings and the safe removal of remaining asbestos and other hazardous substances, given that the type of renovation work to increase energy performance in buildings typically involves parts of the building where asbestos was used extensively in the past, such as the building's electric plant, roofing, or walls.

In light of the growing need to improve the European building stock in terms of energy performance, it is evident that asbestos will be handled in greater quantities, which in turn will affect a number of policy areas including for example occupational health and safety, public health, workers' skills and qualifications, market surveillance, research and development and waste management. The European Parliament already proposed such measures in its resolution on "Asbestos related occupational health threats and prospects for abolishing all existing asbestos" (2012/2065(INI)) which calls on the Commission to integrate asbestos removal with other policy areas such as energy efficiency, and the European Economic and Social Committee recently published its opinion on "Freeing the EU from asbestos" (CCMI 130), which recommends similar measures. During a joint EESC/CoR conference on "Freeing Europe Safely from Asbestos" which took place in Brussels on 24 June 2015, participants discussed the need for a working group within the European Commission, gathering representatives of the various services concerned.

The EFBWW sees in this both an opportunity for growth and innovation in the construction sector, and the opportunity to join a range of related, but in our view insufficiently connected, policy areas in a holistic way.

We therefore call together with the rapporteurs of the EESC opinion on the European Commission to set up such a working group comprised of all relevant Commission services and agencies, in order to elaborate a coherent and comprehensive EU strategy on dealing with asbestos.

As we believe that addressing building renovation in such a holistic manner will be a driver for growth and innovation, DG GROW could play a significant role as facilitator in driving a concerted effort and implementing some of the measures in the framework of its “Construction 2020” initiative.

In the following we will outline some of the priorities we see for taking concrete action as part of a comprehensive EU strategy. One promising approach would be to combine EU policy for energy performance in buildings with asbestos removal. We believe that this could be implemented in part through the Construction 2020 programme or through similar initiatives. Measures to promote energy performance in buildings and parallel asbestos removal could include measures to ensure effective safe and healthy workplaces, adequate workers’ qualifications, safe waste disposal policies and environmental protection, registration of asbestos in buildings, and appropriate sources of funding. Priority could be given to the renovation of public buildings, social housing and to infrastructure projects such as roads, where asbestos has been used extensively as well, but appropriate financial support should also be available to private home owners.

An important area concerns the improvement of working conditions as well as safety and health at work through innovative technology in asbestos removal, and by ensuring an adequate and appropriate level of skills and qualifications to the concerned companies and workforce.

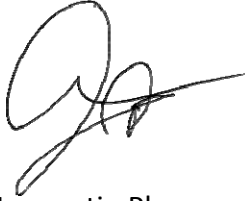
The World Health Organization (WHO) called for national action programmes for the elimination of asbestos related diseases in Europe. We support this call and believe that the efforts of the European Commission should result in the Member States formulating national action programmes with sufficient funding, including relevant EU funds, to enable deep renovation measures to be conducted in a comprehensive manner.

These national action programmes should also include occupational health and safety, public health, workers’ skills and qualifications, market surveillance, research and development, waste management and victim compensation. Given the divergence across Member States one priority should be adequate and appropriate skills and qualifications, particularly in companies that are not specialized in asbestos removal, but that may still encounter asbestos for example during the course of maintenance or renovation and who are not covered by existing EU directives. Another could be the establishment of registers for harmful substances including asbestos according to national practice on local, regional or national level, where these do not exist already. Registering harmful substances in buildings once they have been identified is an effective preventive measure that can help to protect workers, inhabitants, and the general public by providing information about possible health threats before commencing work on a building.


Last but not least, the European Commission can play a key role in promoting research and development in the framework of Horizon 2020 in order to develop innovative practices and techniques for prevention of asbestos related diseases and the removal of existing asbestos. One promising innovation for example comes from France, where robots are utilized for asbestos removal.

We look forward to your response and would be pleased to have further discussions with you on the subject.

Yours sincerely,



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