



Defence
Infrastructure
Organisation



DIO Enduring Strategy for the Management of Asbestos in Infrastructure 2020-2030

FOREWORD

DIO is committed to maintaining statutory compliance and in line with the DIO Safety Strategy, it is working to reduce the burden of asbestos infrastructure risk by seeking to remove all asbestos containing materials (ACMs), unless there is strong evidence this is not viable.

This strategy sets out our objectives and the actions in progress or planned to improve the management of ACMs, and to align with any strategic direction in the management of asbestos in infrastructure as it emerges from the developing Defence-level Asbestos Strategic Plan sponsored by Director HSEP

The decision of our customers to retain, remediate or remove ACMs will be influenced by compelling information, expert advice, and active advocacy. We will also increase our customers understanding of the risks and (as required) develop viable remedial options to protect estate users and contractors.

This Strategy is also issued (in part) in response to asbestos incidents and a Health and Safety Executive (HSE) "Asbestos Management Systems" intervention in 2019 and seeks to address the lessons subsequently identified across the MOD estate (referenced at Annex A).

The implementation of this strategy will be with the support of the Defence Infrastructure Compliance Committee (ICC), with the practical elements overseen by the ICC Asbestos Working Group who will provide progress reports to the ICC and DIO Head Technical Services on a monthly basis.

Richard Lowey Head Technical Services

DIO Mission

Caring for the Defence Estate and those that depend on it, enabling Defence to live, work, train and deploy through "**One Team, Excellent Advice and Outstanding Delivery**".

DIO Vision for Managing Asbestos in Infrastructure

To lead Defence in ensuring everyone working, living on, or visiting the MOD estate is protected from exposure to asbestos fibres.

Strategic Objectives Overview

Appoint a Technical Authority for Asbestos in Infrastructure to set and maintain a new Technical Standard for Asbestos Management.

We will appoint a Technical Authority for Asbestos in infrastructure to set and assure Defence-wide compliance with a new common Technical Standard and provide expert guidance and direction to TLB/EOs, Infrastructure Delivery Agents and Industry Partners.

Work with our customers to better understand the levels of compliance with the existing MOD asbestos management system and develop solutions where areas for improvement are identified.

We will determine the accuracy and completeness of asbestos information currently held at establishment/contractor level, develop prioritised survey programmes where gaps are identified, and bring all locally held asbestos data into a Central Register to enable a more holistic approach to asbestos management.

We will ensure customers/dutyholders are provided with accurate information and the expert advice they need to make informed decisions on legacy and emerging asbestos risks; and that lessons learnt exercises are carried out and promulgated for every significant asbestos incident or intervention on the estate.

Deliver affordable remediation programmes ensuring arrangements are more agile and proactive in reducing the management burden with removal as the preferred option unless there is strong evidence this is not viable.

We will continue to remove all "Very high" and "High" risk ACMs where encountered. The removal of all known holdings of "Very High" risk ACMs has already been completed and funded plans are in place to remove all known "High" risk ACMs from the estate by the end of FY 23/24. We will provide

programmes to further reduce the management burden of all Medium risk rated asbestos by end FY 2029-30 by removing from the estate, unless removal is shown to be not practicable/viable.

We will ensure that asbestos Priority (likelihood of disturbance) Assessments are completed with support and information provided by HoE/ DIO/ MMO to the specialist Surveyor, such that all “Very high” and “High” risk ACMs are accurately identified.

We will ensure completion of surveyor recommendations for the removal, repair or encapsulation of ACMs where specified in either the original Type 2 surveys, subsequent Management surveys or in the annual re-inspection surveys.

Increase asbestos management training / awareness of roles and responsibilities across Defence.

We will provide access to competent advice and information needed to make good, risk-proportionate decisions and enable duty holders to deliver their duties safely and effectively. We will also specify the required asbestos management training / awareness for roles and responsibilities across Defence.

Strategic Response

The actions being taken to deliver these objectives are detailed below.

We will appoint a Technical Authority for Asbestos in Infrastructure to set and maintain a new Technical Standard for Asbestos.

1. DIO Chief Operating Officer (COO)¹ will identify [by formal delegation] and resource a “Technical Authority for Asbestos in infrastructure”.
2. The Technical Authority will fulfil the general duties of the role as defined in the Defence [Infrastructure System Handbook "Governance" Leaflet](#). Duties/actions specific to this Strategy include:
 - a. Act as the Defence lead for the Asbestos in infrastructure management system, providing direction and guidance to Commands/EOs, Infrastructure Delivery Agents, and Industry Partners on how to comply with Infrastructure Policy and related Standards.
 - b. Develop (in consultation with all stakeholders), issue and maintain a new asbestos Technical Standard to update and replace the existing DIO Policy Instruction by **(3 months after appointment)**
 - c. As part of that Standard put in place a revised assurance² and monitoring regime that:
 - Does more to physically monitor and verify supply chain activities to ensure they are doing what is expected; and that resultant advice on risks/actions needed accurately reflect building use and represent good value for money.
 - Assesses Defence-wide compliance with Infrastructure Policy and Standards.
 - Ensures the Defence infrastructure asbestos management system remains suitable.
 - Identifies and escalates related risks to infrastructure users; and to DCDS (Mil Cap) where this effects Defence capability.
 - d. Maintain professional and technical expertise in the development of future asbestos management, inspection, and testing regimes which best meet Defence needs.

The Technical Standard will clearly define:

1. Head of Establishment (HoE), Infrastructure Delivery Agent and Industry Partner, dutyholder and dutyholder-facing roles and responsibilities in the management of asbestos in infrastructure.
2. The methods and standards to be achieved in the identification (surveying), assessment, management and removal of asbestos that take full account of the lessons identified by the 2019 incident investigations and HSE intervention.
3. That the HoE (or MOD occupier), Infrastructure Delivery Agent (DIO), Industry Partner site representatives and specialist surveyor must be actively involved in the Asbestos Survey “Priority assessment” process (as defined in the Regulations and guidance) and resultant action / funding decisions.

¹ As the appointed “Technical Authority for Safety, Engineering & EP aspects of Infrastructure and Estate Management”.

² To include a review of existing 1st and 2nd party assurance and audit procedures (e.g. EM02); and how HoE are to be assured by Delivery Agents / Industry Partners that the management regime is being implemented appropriately.

4. That future Asbestos Surveys eliminate, or where elimination is not reasonably practicable, minimise caveats such as height limitations or “areas not accessed”³; and look at the potential for the migration and accumulation of contaminated dust or debris from unoccupied areas or previous construction activity.

5. That Service Family Accommodation (SFA) is to be treated as non-domestic premises for the purpose of compliance with Regulation 4 of the Control of Asbestos Regulations and MOD Policy.

[Note: Legally, the Duty to Manage Asbestos (Reg 4 of CAR), only applies to “non-domestic” premises (e.g. workplaces). Defence policy extends its application to the private living areas of SFA/SLA to ensure the same level of protection is afforded to occupants; and acknowledge these areas are also workplaces for visiting maintenance workers.]

6. Good practice guidance on the methods for the stabilisation and confinement of asbestos products that are in poor condition and present a risk of fibre release where removal is not practicable.

7. A standardised set of management documentation⁴ to be applied (but made establishment / contract-specific) across Defence and all contract portfolios.

8. An asbestos signage/labelling strategy developed along with stakeholders and implemented in a consistent manner across the estate that: indicates the location of asbestos, the precautions required, and the action to be taken where it is disturbed.

9. That all asbestos management, remediation, and waste disposal activities align with applicable Asbestos and Special/Hazardous Waste Regulations and guidance, and Defence’s Sustainability Strategy.

10. The process for ensuring that where an ACM being removed is providing fire protection, its replacement is reviewed by a competent person and confirmed to meet current Building Regulations and Defence Infrastructure Fire Standard requirements.

Expected Outcome:

That DIO as Infrastructure Expert embeds its role as Technical Authority for asbestos providing direction and Standards to be applied across the whole Defence community.

³ See DIO RD Advice paper “20200911 Asbestos Management Surveys - Detailed Requirement and Scope of Works v1.0”.

⁴ Including establishment Asbestos Management Plans, Asbestos Registers, Building plans, Asbestos Action Plans and labelling requirements.

We will work with our customers to better understand the levels of compliance with the existing MOD asbestos management system and develop solutions where areas for improvement are identified.

1. Director Regional Delivery will continue to coordinate this through the Infrastructure Compliance Committee Asbestos Working Group, and the actions agreed by the Infrastructure Joint Committee (IJC) in Sep 19 (See Annex B).

2. In doing so, the IJC actions being delivered by Director RD will agree the allocation of funds to discharge the following through contract delivery and assurance mechanisms or by joint DIO/customer collaboration activities:

- a. Verify the existence and currency of existing Establishment Asbestos Management Plans; Asbestos Registers, Asbestos Action Plans and supporting Asbestos Surveys.
- b. Review **existing** Asbestos Surveys to:
 - Ensure they adequately identify or presume the presence of ACMs throughout all areas of the asset.
 - Check for any caveats and ensure that any non-accessed areas are presumed to contain asbestos, or undertake additional surveys to eliminate these areas.
 - Ensure all known/presumed ACMs identified in the above, and actions recommended by the Surveyor, are captured in the establishment Asbestos Register and Action Plans and acted upon.
 - Ensure any immediate make-safe actions or change in remediation/inspection programme identified by this review are captured the establishment Asbestos Register and Action Plans.
- c. Confirm that establishment Asbestos Registers and Action Plans are based on Survey recommendations / risk ratings and have been maintained up to date (e.g. with any subsequent removal works, change of building use, more recent asbestos survey or changes identified through the statutory “condition monitoring” inspection regime).
- d. Ensure arrangements are in place to ensure any change in risk rating or management regime identified by a statutory re-inspection report is brought to the attention of the HoE/dutyholder and any actions therein are completed in accordance with the timescale recommended by the surveyor.
- e. Confirm whether all known/presumed ACMs, or the method of encapsulation / point of restricted access, are labelled with clearly legible asbestos statutory warning labels and subject to planned condition monitoring by competent persons (at least annually).
- f. Implement the asbestos labelling strategy detailed in the Technical Standard.

3. Director RD will sponsor the delivery by DEx/CIO of a costed, centralised electronic storage and reporting system for all infrastructure related asbestos information to:

- a. Capture all Defence infrastructure & asbestos related information, not just those under DIO contracts.
- b. Compile a single Estate-wide Asbestos Register and Action Plan to a format agreed by the Technical Authority for Asbestos to enable greater oversight and more holistic approach to managing estate-wide risks and remediation planning.
- c. Provide Management Information (MI) on which to aggregate, analyse and report establishment and estate-wide asbestos risks; and more effectively plan asbestos remediation programmes.
- d. Be readily accessible to those inputting/maintaining the information/records on MODs behalf (e.g. the Industry Partner) or otherwise require access (e.g. Head of establishment, infrastructure users).
- e. Allow the upload and retention of all existing and future relevant data (e.g. Asbestos Survey Reports; Clearance Certificates; Waste Consignment Notes, etc).
- f. To store copies of all asbestos records (e.g. asbestos management plans, registers, action plans, survey reports, statutory inspections, and removal/sampling, re-occupancy certificates, etc.
- g. Be used to monitor completion of statutory condition monitoring inspections and periodic review of establishment/contract Asbestos Management Plans.
- h. Require and ensure that all asbestos records are retained for at least 60 years.
- i. Future-proof the asbestos management system from loss or corruption of data at change of contractor and facilitate greater consistency in documentation format and quality.

4. In parallel with the above, HoEs, DIO and the Industry Partners will continue to jointly review all Asbestos Register/Survey “Priority” risk ratings ⁵ and recommended actions to ensure they remain valid considering any changes in building use, occupancy, maintenance activities or likelihood of disturbance.

Expected outcome: That DIO, its customers and supply chain work together to drive continual improvement in delivery performance and ensure those making decisions on changing risk are suitably informed and supported.

⁵ The Asbestos Survey “Material and Priority Assessment” as detailed in Annex C.

We will work with our customers to formulate and deliver affordable remediation programmes ensuring arrangements are more agile and proactive in reducing the management burden with removal the preferred option unless there is strong evidence this is not viable.

1. Director Regional Delivery will continue to coordinate, through the ICC Asbestos Working Group, a set of actions agreed by the IJC in Sep 19 (**See Annex B**) aiming to reduce the inherent risk with a phased programme of targeted removal of known “Very High” and “High” risk rated Asbestos across the estate.

2. We will agree with parent TLB/EOs **[subject to paragraph 3]** the allocation of funds to:

a. For asbestos contaminated dust/debris and residue:

- 1) Remove all known holdings not identified as low risk rated, or where identified for removal in the Asbestos Surveys Material and Priority Assessment (see Annex C), by FY 2024/25.
- 2) Treat any new findings as “Very High” risk rated asbestos and remove as an equal priority.

b. Remove, or where this is not practicable/viable, otherwise eradicate⁶ the risk to MOD Estate users of:

- 1) All known “Very High” risk rated ACMs identified through future survey or statutory re-inspection.
- 2) All known “High” risk rated ACMs by end FY 2023-24 or in accordance with future survey or statutory re-inspection recommendations.

c. Reduce the management burden of all Medium risk rated ACMs by completing any actions recommended by the Asbestos Survey report (e.g. remove, encapsulating or repair) by:

- 1) The end FY 2025-26 for Service Family Accommodation, and
- 2) Elsewhere by end FY 2029-30.

d. Remove, encapsulate, repair or manage ACMs left in situ in accordance with the recommendations of any future Asbestos Management Survey or statutory re-inspection report.

e. Take targeted (e.g. whole building, building type) or opportunistic removal/remediation (e.g. remove lower risks whilst accessing Very High/ High Risk) in parallel to the above where this is reasonably practicable and offers the best value for money with regard to statutory compliance, user safety and the longer-term management burden.

f. Ensure that any known or presumed ACM has a clear visible label detailing the presence of asbestos. That missing, damaged or deteriorated labels are replaced to a common labelling standard that meets the requirements of the Technical Standard.

3. **Any decision not to remove** shall be dependent on the review of the Asbestos Survey Material and Priority Assessment determining (and records demonstrate) that:

- a. Removal is not viable and that the lower management option being taken (e.g. encapsulation and/or leave, label and monitor) will remain compliant and cost effective over time, or
- b. There is insufficient capacity or significant environmental impact ⁷ (e.g. Surveyors, Asbestos Removal Contractors, Licensed conveyors and Landfill sites) to meet Defence requirements.

4. All asbestos left *in situ* will be managed or repaired/encapsulated in accordance with the Surveyor Recommendations, the Priority risk ratings, and the locally agreed Action Plans.

5. DIO will continue to support DCDS (Mil Cap) and the Defence Safety and Environment Committee (DSEC) in the setting of risk appetite and elimination ambitions for asbestos in infrastructure within the developing “Defence Asbestos Strategic Plan”; and amend this Strategy to align where necessary.

Expected outcome: That Defence-wide arrangements for managing asbestos secures compliance with statutory and MOD mandated requirements; and actively seek to reduce asbestos holdings and associated risks, management burden and cost. That all asbestos management, remediation, and waste disposal activities represent best value for money and align with Defence’s Sustainability strategy.

⁶ By applying means that reduces the risk to levels that are “as low as reasonably practicable” (ALARP) – e.g. by repair or encapsulation.

⁷ An appropriate level of Sustainability Appraisal will be identify risks and the need for further surveys / studies (e.g. ecology) or the requirement for a full sustainability appraisal

Increase asbestos management training / awareness of roles and responsibilities across Defence.

1. The DIO Technical Authority (DIO Head Technical Services pending appointment), in consultation with the ICC Asbestos Working Group will:

- a. Establish minimum qualification, training and experience requirements for all Defence and contractor personnel involved in the management of asbestos; or risk-based decisions and allocation of funds for related works.
- b. Ensure training and competence requirements specifically include TLB Senior Leaders, Heads of Establishment; Finance/Commercial officers, the Delivery Agent and Industry Partner; and any persons these engage to deliver duties on their behalf (e.g. building custodians, Asbestos Surveyors, anyone inspecting/monitoring the condition of ACMs left in situ).

2. Parent TLB/EOs will need to allocate funds where required for identified training requirements for staff within their area of responsibility; and ensure chosen providers are accredited by an appropriate body.

3. Infrastructure Delivery Agents will require industry partner compliance with mandated minimum training requirements at tender and monitor through the contract term.

Expected outcome: That duty holders and everyone within Defence who has a role in the management of asbestos in infrastructure is adequately informed, trained, and resourced to understand their duties and carry them out safely.

Record of Lessons Identified Publications.

	Publication	Dated
A	Asbestos Compliance Ltd (ACL) "Initial Overview of Ashchurch Site and Asbestos Management".	9 Jul 19
B	Director RD "Asbestos Update" paper to the IJC.	19 Jul 19.
C	DIO Interventions "Report on Cross Regional Review of Compliance with Asbestos Management Arrangements at Raf Brize Norton under Regional Prime SE".	30 Aug 19.
D	Dir RD " Asbestos Management Improvement Strategy " paper to the IJC	23 Sep 19.
E	HSE Asbestos Management Inspection HMNB Portsmouth	23 Sep 19.
F	DIO Interventions " Interim Report on the DIO Interventions Team Review Of Asbestos Management On The Air Estate".	17 Oct 19.
G	RAF Brize Norton Non-Statutory Inquiry (Sqn Ldr A Metcalfe)	Not held
H	HSE " Management of Asbestos Cement Products at MOD Ashchurch" report	11 Dec 19.
I	HSE Public Sector Asbestos Management Systems Intervention Report	21 Feb 20.
J	Dir HSEP "HSE Asbestos Intervention MOD Response Letter [to Ref H]"	9 Apr 20.
K	ACL "Review of [Ashchurch] Road Sweeper Results".	27 Apr 20.
L	ACL "Asbestos Issues and Control Measures at the Ashchurch Site May 2020"	May 20.
M	ACL "Asbestos Issues and Control Measures at the Ashchurch Site Mar 2021"	Mar 21.
N	ACL "Asbestos Issues and Control Measures at the Ashchurch Site May 2021"	May 21.

Actions held by DIO Technical Services

Appoint a Technical Authority for Asbestos.

Develop and issue revised Technical Standard within 3 months of appointment

Actions already in train through IJC [Action number in brackets]

Understand levels of compliance with the existing MOD asbestos management system

A cross-estate census exercise has been undertaken to check that all Establishment Asbestos Management Plans (AMP) and Asbestos Registers are correctly held at site level, and where they are not, that action is taken to rectify [3j].

Categories of asset to have old Type 2 surveys replaced with a higher standard “HSG 264 Management Survey” to be identified & a prioritised programme of surveys agreed with TLBs/EOs [3i].

An estate-wide, comprehensive asbestos assurance exercise is undertaken by Heads of Establishment, supported by infrastructure site delivery staff [3e].

Assets without an asbestos survey, or where this cannot be located, to be identified and a prioritised programme of surveys agreed with TLB/EOs [3j].

A structural/risk-based approach is to be developed to review Asbestos currently in the Medium, Low & Very Low risk categories, where we may now see increased risk because of deterioration over time [3k].

A costed plan is put in place to roll out a MOD centralised electronic storage system for infrastructure asbestos related information [3m].

Additional guidance on testing regimes for Asbestos is to be developed and issued [3h].

Reduce inherent risk with a phased programme of targeted removal of known “**Very High**” and “**High**” risk Asbestos.

Asbestos risk data currently held in establishment AMPs and Asbestos Registers for the PFI, Training and Overseas estate, and for the non DIO managed estate, to be collated and indicative remediation costs for **Very High** and **High** risk classified Asbestos, worked up [3a].

Work orders to remedy **Very High** risk classified Asbestos across the 4 NGEC Regional Prime Contracts estate are raised as a priority with the intent to fund in year [3b].

Priority is given to remediation of **High** risk classified Asbestos over the period FY 20/21 to 22/23 [3c].

Indicative costings to remediate **Very High** and **High** risk classified asbestos across the 4 NGEC Regional Prime Contracts are further reviewed to provide greater levels of assurance that the assessments are verified and that costs are of the appropriate order [3d].

Increase asbestos management training / awareness of roles and responsibilities across Defence.

Complete a review of Industry Partner and MOD staff asbestos-related, professional qualifications, experience and awareness training [3f].

Put in place an asbestos awareness/training programme and produce an updated Head of Establishment Good Practice Guide [3g].

Asbestos Surveys (Material and Priority Assessments)

All Asbestos Surveying on the Defence estate has been undertaken in accordance with the HSE Publication “Asbestos: The survey guide (HSG264)” since it was first published in 2010. Actions already taken through the IJC have identified those surveys conducted before this date that require replacing.

An “Asbestos Management Survey” (as defined in HSG264) is carried out to determine the presence and extent of suspected asbestos containing materials (ACMs) in a building that could be disturbed during normal occupancy and maintenance activities; and to assess their condition.

In doing so, the Surveyor will:

- a. Make a “Material Assessment” of the condition of the ACMs found to:
 - 1) Assess their ability/readiness to release fibres if disturbed. This is scored using a standardised assessment tool: 10+ is rated as having a “high” potential to release fibres if disturbed, 7-9 a “medium” potential, 5-6 a “low” potential, and <4 a “very low” potential.
 - 2) Determine what actions are required due to the material condition (e.g. remove, encapsulate, repair, etc) and their urgency (e.g. immediate, middle/longer term, etc).
- b. Engage with the Head of Establishment, DIO, Industry Partner and the Appointed Person Asbestos to jointly conduct a risk assessment (known as a “Priority Assessment”) to accurately assess building use and the risk of the ACMs being disturbed taking into account their location, building use and the potential for human exposure, etc. This is also scored using a standardised assessment tool to provide a “Total Priority Assessment Score” (12 max).
- c. The Material Assessment score is then added to the Priority assessment score for each ACM to provide an overall “Risk Rating”, which is then used to establish the priority for actions relating to the material.

The table below provides an example of how the combined Material and Priority risk assessment scores is used to decide the minimum actions required with DIO contracts:

Risk Assessment Score	Risk Rating	Minimum Action Required
19 - 24	Very High	Restrict access to the area and repair/remove immediately.
14 - 18	High	Restrict access to the material and repair/remove at the earliest opportunity.
9 - 13	Medium	Restrict access to the material if necessary. Monitor the material closely and schedule for repair/removal when possible.
5 - 8	Low	No immediate action required - Material needs to be managed.
1 - 4	Very Low	No immediate action required - Material needs to be managed.