

Written evidence from the Science Museum Group (ASB0027)

The Science Museum Group comprises the Science Museum (London), the Science and Industry Museum (Manchester), the National Science and Media Museum (Bradford), the National Railway Museum (York), Locomotion (Shildon), the National Collections Centre (Wroughton), and a collections facility in London. We share a mission to inspire futures through creative exploration of science, by building a scientifically literate society and by inspiring the next generations of scientists, inventors and engineers. As the world's leading group of science museums, we welcome over five million visitors each year.

Our unparalleled collection of over seven million items spans science, technology, engineering, mathematics and medicine. It includes icons such as Stephenson's Rocket, Alan Turing's Pilot Ace Computer, Crick and Watson's 1953 DNA molecular model, the record breaking locomotives Mallard and Flying Scotsman, the world's earliest known surviving photographic negative, and Richard Arkwright's textile machinery.

We welcome the opportunity to respond to this consultation. We have responded only to those questions relevant to our mission.

How effective is the current legislative and regulatory framework for the management of asbestos?

The Science Museum Group (SMG) complies with the Control of Asbestos Regulations (CAR) 2012 in the management of asbestos in its buildings and in its historic object collections. The legislation, its associated Approved Code of Practice, and HSE's guidance is notably buildings-centric and says little for the management of asbestos in historic objects except through an assumption that whenever asbestos is found it can be managed in the same way as asbestos in the built environment.

The current legislative and regulatory framework, despite total prohibitions on new use of asbestos since 1 January 2000, does not appear to have ever fully addressed the question of asbestos in historic objects, whether these are part of museum collections or within the commercial and private marketplaces for antiques. This can be demonstrated by retrospective mechanisms for lawful use of asbestos in museum collections and in the historic motor vehicle trade through the HSE's REACH Exemption Certificates.

Does HSE keep adequate records of asbestos in public buildings?

The Committee may be aware that HSE does not keep records of asbestos in public buildings. Employers, however, are required under Regulation 4 of the Control of Asbestos Regulations 2012 to maintain an adequate record of asbestos in a non-domestic premises. This is usually in the form of an asbestos register. Presently there is no distinction between record keeping for public buildings and other types of buildings.

The Science Museum Group (SMG) expresses interest in the definition of 'asbestos in public buildings' and to what extent this could apply to museum object collections. SMG, like all national museums, keeps historic object collections within what can be described as public buildings, such as our galleries. The vast majority of our collections are kept inside museum storage spaces and not routinely accessible to the public, so the distinction between public buildings and non-public buildings is relevant. A small proportion of these historic objects contain asbestos however in SMG's case, out of millions of unique objects and archives, the total number of objects with asbestos is in the tens of thousands. The Control of Asbestos Regulations 2012 already requires SMG to maintain an up-to-date register of asbestos in its buildings and also in its historic collections. If HSE were to be involved in the record keeping of asbestos in public buildings one implication is that asbestos-containing objects in historic collections would also form a significant part of that record.

How effectively does HSE engage with external stakeholders and experts about its approach to the regulation of asbestos?

The Science Museum Group (SMG) has found the HSE to engage closely with museums about the regulation of asbestos wherever its attention is drawn to issues relevant to museums. For example, between 2011 - 2012 the HSE invited SMG and other national museums to contribute to an economic impact assessment about the cost of the total removal of asbestos from historic objects held in museum collections as a result of the EU's

REACH Directive. The outcome was that government created the REACH Enforcement (Amendment) Regulations 2013 to allow the HSE, and later the Office of Rail & Road, to create class exemptions for the supply of 'articles' containing asbestos which was otherwise prohibited by legislation. The development of a class exemption for museum objects followed a round of further consultation between national museums, the HSE, the Department for Digital, Culture, Media & Sport, and Arts Council England.

The HSE continues to engage with SMG when we have questions regarding the appropriate interpretation of the Control of Asbestos Regulations 2012 for the management of asbestos in historic objects. For example, SMG sought clarification about the appropriate interpretation CAR 2012 in relation to the movement of asbestos-containing historic objects. CAR 2012 notably says nothing about this except for the movement of asbestos as a waste material.

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