

Dr Martin Gibson
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25th February 2008

Dear Martin,

I would like to thank you for giving BOHS members the opportunity to comment on the draft MDHS100. I have included some general comments below, but more specific comments have been added in "track changes" mode to the draft sent for comment.

In general, BOHS members welcomed the review of MDHS 100 and have commented that the latest draft tackles some of the concerns expressed in the past about the document's shortcomings. However, there is still some way to go to make it the comprehensive document that it should be. Currently it was felt that the layout and ordering of topics was "muddled" and that there was not enough cross-referencing to other relevant documentation. With regard to some topics, members' opinions were that the wording was not strong enough. For example, on the use of caveats and exclusions by surveyors, and the use of two surveyors for most surveys.

Members were pleased to see more prominence given to survey planning and information-gathering, but feel that more could still be done on this subject to emphasise the importance of good planning to a successful survey. A well-planned survey with a detailed exchange of information between the dutyholder and surveyor forms the basis of a survey which will provide the dutyholder with the information he requires. More detailed comments are included in the annotated draft attached.

Opinions were mixed about the scope of the document. Some felt that it should essentially be a technical document for surveyors, but that would be useful to dutyholders and others. Other members felt that MDHS100 should be written for dutyholders as well as surveyors. At the moment, it is felt that the current draft is neither one thing nor the other. The current draft includes some information for dutyholders, but not enough if it is to be a main reference point on surveying as a management tool for dutyholders, and there are certainly not enough cross-references to other useful documents. Conversely, members were keen to see the priority assessment discussed and included in MDHS100, as in reality many surveyors were asked by the dutyholders to help them to complete the priority assessments. There was also one comment about the current complexity of the priority assessment.

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BOHS members were also interested to know where the new MDHS100 would sit within the range of HSE publications. Will it continue to be an MDHS, in which case it will be available freely on the internet to all interested parties, and will by default become the standard reference for dutyholders and surveyors alike? If it is, then it should be expanded to include more information for dutyholders. Or is the plan that the new MDHS100 will become an HSG document and therefore priced? One suggestion is that if it is an HSG, then it should be linked to the HSG227 (suitably updated), in the same way as the Analyst's and Contractor's guides.

Most members were very pleased to see the reference to UKAS-accredited surveying companies and individuals certified by ABICS and NIACS. Many members have seen the results of poor asbestos surveys and report that dutyholders are often unsure of how to identify high quality surveyors. Although it is recognised that accreditation/certification does not in itself guarantee quality, it is one indicator, and members are pleased that this has been highlighted by HSE in a key document.

If you have any queries or require clarification of any comments made, please do not hesitate to contact me. BOHS members would be pleased to have the opportunity to comment on future drafts of MDHS100.

Yours sincerely,

Tracey Boyle MSc Dip Occ Hyg MFOH
On behalf of BOHS