

Dear Mr Birkett

TfL Ref: FOI-1595-1314

Thank you for your email received by us on 25 November 2013 asking for information about asbestos on-London Underground (LU). I apologise for the delay in providing this response.

Your request has been considered in accordance with the requirements of the Environmental Information Regulations (EIR) and our information access policy. We hold some of the information you require.

In your request you said that you wanted to understand asbestos on LU with a view to assessing or determining the possibility, risk and/or control of harmful emissions to air. Given the systems and controls we have in place to manage asbestos containing materials, as described below, the risk of harmful emissions to air is extremely remote

Asbestos was widely used in many constructions including London Underground premises and assets up to the late 1980s and as a consequence can be found across the LU estate in buildings, rolling stock, equipment and plant. Asbestos is known to be present in diverse places such as ceiling and floor tiles, electrical cables and cable troughs, heat insulation boards, roof coverings, etc. Therefore it is essential that it be identified, an assessment be made of its condition, then it is either managed by leaving it undisturbed (i.e. contained), or it is quarantined and arrangements made for its removal or encapsulation and a permanent record of its location made.

As required by legislation (Control of Asbestos Regulations 2012, Construction (Design and Management) Regulations 2007 and other legislation), London Underground has a management system in place to record the existence, location and condition of asbestos within its assets. Following expert advice, a policy is in place which means that providing the asbestos is suitably encapsulated or contained the asbestos can be considered safe. If any work is to be performed on any asset the absence or presence of asbestos is established either based on existing records or by intrusive inspection undertaken by appropriate personnel and the work is then undertaken in an appropriately controlled manner.

The primary standard governing asbestos related activity is Category 1 Standard S1130 'Control of Asbestos in LU Premises'. The principles from the Standard are turned into procedure and instructions in Guidance Document G0130 'Asbestos Control'. G0130 includes details of the responsibilities of the Asset Performance Directorate (APD) (maintenance), Capital Programmes Directorate (CPD) and the Asbestos Control Unit (ACU), including agreeing scopes of work with the ACU, and the assurance documentation that must be provided for ACU on completion of the asbestos work. These are attached for your reference. Standard S1130 includes coverage of air testing, competence and training, asbestos registers, emergency procedures, and safety and environmental considerations. G0130 includes more detailed guidance on topics such as action to take in an emergency, registering projects and planned work, recording changes to asbestos as a result of planned work, and assurance documentation to be produced.

A major component of asbestos management is the undertaking and availability of asbestos surveys that have been compiled by specialist companies. All the available surveys are accessible to all staff and contractors through the online Asbestos Register. The surveys are only suitable for general maintenance and if the work planned is intrusive or involves demolition or refurbishment then further surveys will be necessary. Further surveys may also be required if following risk assessment and gap analysis the information is found to be unsuitable and insufficient for the work involved.

If works disturb asbestos containing materials (ACMs) (planned as part of the work) then a new survey is required at the end of the project to record the condition and volume of any asbestos that remains. The survey report plus waste transfer documentation and other related documentation are all required to be sent to ACU on completion of the works.

A survey of all rolling stock was undertaken in 2008. Following the survey all the highest risk ACMs were removed. The material that was left was identified as being safe if undisturbed. It is only the legacy fleet and 'C' stock trains where asbestos is present. The 'C' and 'D' stock trains (part of the legacy stock) are currently being replaced under controlled conditions. ACMs on rolling stock are in known locations within and under the trains. There is no public exposure and the only persons at risk are LU employees and contractors which is where protection measures are concentrated. Other than passenger trains, other rolling stock that contains asbestos include non passenger rolling stock, engineers train, tunnel cleaning trains, two trains stationed at the end of the Central line used for anti-leaf protection, the 'film' train at Aldwych and a shunting engine.

If potential ACMs are found by staff and they are not sure whether it is asbestos then they will stop work and arrange for a test to be undertaken and advice given on how to proceed.

LU budgets for activities to manage the removal, encapsulation and monitoring of asbestos containing materials (ACMs). This includes the creation and updating of management plans, the asbestos register and asbestos surveys to provide a suitable and sufficient risk assessment of all (ACMs) contained within LU's assets.

LU, where required to remove or repair ACMs, only uses licensed contractors to undertake the works. These contractors are monitored when undertaking works by an independently United Kingdom Accreditation Service (UKAS) accredited analyst.

LU requires on completion of the removal of ACMs, all relevant documentation (including clearance certification, transfer and disposal of asbestos-contained material) to be stored and maintained in accordance with statutory regulations, provided in the aforementioned 'GO130 Asbestos Control Guidance'

LU actively and regularly manages ACMs monitoring the condition of assets, undertaking repairs and removal when they are accidentally damaged or felt to be of risk to damage. In addition, LU will encourage the removal of all superficial ACMs that can be readily removed and replaced by suitable alternative material during its modernisation programme.

As a rule, no works on the Underground specifically relating to asbestos remediation works are undertaken during traffic hours or where the general public cannot be totally segregated. Works carried out involving asbestos are independently monitored ensuring that all control limits are managed and maintained to Health and Safety Executive (HSE) standards.

Finally, LU are currently developing a strategy to explore options for removal or encapsulation of all asbestos containing material across the entire Network, wherever this is viable, and to implement a plan to deliver this. As I'm sure you can appreciate, this will involve a substantial amount of work, so this will need to be carried out over a number of years (yet to be determined).

In the meantime, all asbestos will continue to be managed safely in accordance with our standards.

LU's regulator, the Office of Rail Regulation has audited the work of the ACU and had praised the work and given it a good report.

In your request you specifically asked for:

- i. one single map; one single table; one single spreadsheet or workbook; and/or one single 'scorecard' held by TfL summarising the location, amount and/or extent of asbestos believed to exist within the London Underground omitting any locations required to be withheld for the purposes of national security or otherwise. This might therefore be up to five summary pieces of information;**

The information you have requested is not held in such summary format. The information we hold is by reference to each station, depot, siding, track section and type of rolling stock and it is contained within thousands of separate documents covering all assets. This is explained further in the following paragraph.

- ii. the latest plan(s) held by TfL (e.g. the Asbestos Control Unit) or its agents or by Tube Lines for the Jubilee, Northern and Piccadilly lines that set(s) out how you are going to manage the risk at locations where asbestos is believed to exist. As you know, such plans are required to be held by the Control of Asbestos Regulations 2012. This might be one plan covering all sites or several plans;**
- iii. any evidence you are taking the steps needed to put each plan mentioned in (ii) above into action; and**

Please see the attached folders 'Plans and Strategy', 'Location Specific Information' and 'Rolling Stock Pictograms'. Due to the large volume of documentation we hold for every asset on our network, we have provided a selection of reports by way of an example, and we are happy to provide similar reports for any stations or other assets that you specify. However, provision of every report held would place a disproportionate burden on the specialist staff responsible for Asbestos Control, as each document would need to be extracted and checked for personal data or information that could risk the security of the network. A request for all documents would, as you have previously been advised, be refused under Regulation 12(4)(b) as manifestly unreasonable.

- iv. details of any monitoring undertaken since 1 January 2010 including the results thereof that would support TfL's assertion that 'there is [therefore] no possibility of our staff or customers being exposed to airborne asbestos fibres on the Underground' e.g. regular and/or random monitoring of asbestos in areas of the network that are publicly accessible. Please note the information provided in response to TfL Ref: FOI-1046-1314 said the type of fibres identified in that testing was not known.**

Please see the attached folder 'Monitoring' for a selection of sample reports. These reports are location specific and are created whenever work is undertaken that may involve ACMs. As previously mentioned, given the aforementioned systems and controls we have in place to manage asbestos containing materials, the risk of harmful emissions to air is extremely remote.

In accordance with the Environmental Information Regulations 2004 (EIR) we are not obliged to supply some of the information as it is subject to a statutory exception to the right of access to information under Regulation 13. In this instance the exception has been applied as disclosure of signatures on some of the documents you have requested would breach the Data Protection Act. The use of this exception is subject to an assessment of the public interest in relation to the

disclosure of the information concerned. We recognise the need for openness and transparency by public authorities, but in this instance the disclosure of the signatures carries with it a risk of fraud against the individuals. Please see the attached information sheet for details of your right to appeal as well as information on copyright and what to do if you would like to re-use any of the information we have disclosed.

Yours sincerely

Simon Guild
Information Access Manager

FOI Case Management Team
General Counsel
Transport for London