Health and Safety Executive
5 South, Floor 1
Redgrave Court
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BOOTLE
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Dear Mr Brand

12 June 2014

ASBESTOS-CONTAINING VINTAGE GAS MASKS AND HELMETS

1. Thank you for your recent request under Freedom of Information procedures for more information on the advice the Health and Safety Executive (HSE) produced on the health risks associated with asbestos-containing gas masks and helmets and associated precautions. I am responding through this letter and will answer your questions in order below, but I do think it would be helpful for me to first clarify one matter and then give you some detail on the background to this issue.

2. The point I would like to clarify is that HSE has provided advice on the issue of asbestos-containing artefacts such as gas masks to the education departments in Great Britain, at the initial request of the Department for Education (DfE) in England last year (see below). HSE has not produced HSE guidance, or a safety alert and the advice to education departments should not be interpreted as such. As is usual, such official-to-official advice is not published on HSE’s website.

3. By way of background, HSE was approached and made aware that vintage World War Two (WWII) gas masks potentially containing asbestos were being offered for sale via online platforms. The sale or otherwise placing on the market (for example, not-for-profit loan) of items containing asbestos is a breach of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation, which prohibits almost all importation, manufacture, supply and use of asbestos fibres, or articles containing asbestos fibres. We arranged for the purchase and collection of a number of vintage masks for analysis of their asbestos content by our colleagues at the Health and Safety Laboratory (HSL).

4. Whilst our investigation of this was on-going, we were made aware that such gas masks were being used in schools as a part of teaching
aspects of the National Curriculum, with the potential for greater use as the various WWI and WWII anniversaries approached.

5. DfE also asked us towards the end of last year for advice on what schools should do if they are using vintage gas masks as concerns were being raised with them about consequent health risks to teachers and pupils.

6. Based on what we know about the health risks associated with asbestos fibres, the possibility that some asbestos-containing masks might be in very poor condition and, general concerns in society over the dangers of asbestos, our advice to DfE last year was that teachers and pupils should not wear or handle WWII gas masks unless it could be clearly demonstrated the mask was asbestos-free. We noted the ongoing investigation and HSL analysis and committed to update the advice once this work was complete. DfE sent this advice to all schools in England through its networks; HSE also arranged for the advice to be sent to the Scottish and Welsh Governments for distribution to their schools. We also learned that schools in Northern Ireland had for some time been advised not to wear or handle vintage masks as teaching aids, referencing advice from the Imperial War Museums (IWM).

7. The advice we sent to education departments at the beginning of May this year which you refer to is the updated advice promised following the HSL analysis (see my response to Q5 below). We also took the opportunity to discuss the matter with the IWM and the updated advice reflects these discussions.

8. So with that clarification and background I will answer your specific questions in order below.

1. What evidence was produced by the Imperial War Museum that Gas Masks contain asbestos?

We were not given analysis reports by the IWM, but they did confirm to HSE that many British gas masks of WWII vintage incorporated asbestos (both blue and white) within their filters and so may pose a problem given the asbestos may now be starting to break down. They also confirmed that they assume any vintage mask contains asbestos unless it can be clearly demonstrated otherwise.

For these reasons the IWM have for some time recommended that gas masks are never worn, by anyone, and that handling may also pose some threat. The IWM has also chosen to seal the filters on all gas masks in use in their galleries.
2. What evidence was produced by the Imperial War Museum that helmets contain asbestos?

We were not given any analysis reports by IWM, but again they noted that certain helmets contained white asbestos in the padding that ensures a good fit to the wearer's head. The view of the IWM was that such artefacts too, where asbestos is clearly known to be present, should not be worn or handled.

3. The article specifically states 'Brodie' type helmets, this type of helmet runs to many variations and types and was used by the British Army from 1916 until the 1950's, can you tell me which helmets contain asbestos.

Whilst reviewing the collections for their First World War galleries the IWM found that all six Brodie helmets selected for display contained chrysotile (white) asbestos in the helmet lining. Consequently, should any helmet of this type still have this lining, it should be assumed it contains this asbestos and, as with gas masks, should not be worn.

4. The article does not specify which gas masks, again there were many types and marks of gas mask or gas respirator in use by the British Army, can you tell me which gas masks contain asbestos.

It is not possible to say which types or models of mask do or do not contain asbestos, and the assumption therefore is that any vintage mask could contain asbestos. In addition, any used mask may have been exposed to toxic or otherwise hazardous material. For this reason, the advice we gave was precautionary in that unless it is known for certain a mask does not contain asbestos, or it has been somehow made safe and certified as such, it should not be worn or handled by pupils and teachers. This has been the IWM's policy for many years with respect to their displays and learning activities.

5. What investigation did the HSE carry out to confirm the information provided by the Imperial War Museum? Please provide a summary of your investigations.

For clarification, HSE's investigation was done before we had discussions with the IWM (paragraph 5 above). HSE arranged for the purchase and collection of a number of vintage masks from sellers for analysis of asbestos presence by HSL scientists. HSL is an in-house agency of HSE and is recognised as a world centre of excellence in workplace health and safety research. They are also a UKAS accredited laboratory for the analysis of asbestos fibres, using recognised techniques.

HSL analysed 34 masks; 29 were found to contain asbestos and 5 not. Of those where asbestos was present, 23 contained chrysotile (white) asbestos and 6 crocidolite, the particularly hazardous blue asbestos. Most masks were civilian (20), with the remainder designed for military or other emergency personnel. German and British masks were analysed. Masks that contained
no asbestos included civilian, armed forces and emergency service respirators, but asbestos was also found in masks designed for these groups. This supports the view that it is not possible to say which types of mask do or do not contain asbestos.

6. Please provide a copy of the letter and information sent by the HSE to schools.

To clarify, HSE sent the advice to the DfE and to the Scottish and Welsh Governments via usual official-to-official communication. Each education department will have used their usual means to forward the advice to schools and to other interested parties such as the Trade Unions. I attach the advice that HSE sent to the education departments as requested.

There is one last general point I'd like to mention. Whilst, the advice to education departments does mention the disposal of artefacts, HSE most certainly does not want to see the routine destruction of historical artefacts. There are other options available that can make an item safe as the advice notes. Whichever option is chosen the law is clear on dealing with asbestos-containing material, and the precautions to be taken, and the advice simply emphasises this.

I hope this is helpful. Please contact me should you require any further information.

Yours sincerely

[Signature]

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