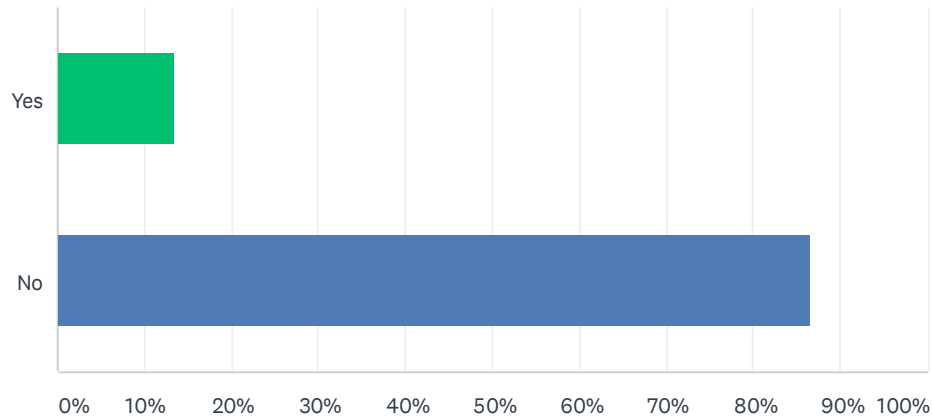


Q1 Do you consider that accreditation for ISO 17020:2012 for the surveying of contaminated land for the presence of asbestos in soil is required?

Answered: 119 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	13.45%	16
No	86.55%	103
TOTAL		119

#	PLEASE PROVIDE A REASON FOR YOUR ANSWER	DATE
1	depending on re-use of site could potentially have impacts	2/18/2021 1:41 PM
2	Its relatively rare that a CL survey would be solely or primarily for asbestos, also the risk assessment process must be understood in order to collect useful information form and SI, therefore at design-stage a more generalist land condition / or contaminant specialist would be preferable, if needed an asbestos specialist could be brought in for later stages	2/16/2021 2:39 PM
3	Yes - because the risks are significantly different between buildings and soils. Soils have a moisture content and a clay fines fraction that both retard airborne fibres, changing the risk profile. Building surveyors do not appreciate this difference in matrix.	2/16/2021 12:21 PM
4	Given the significance of the results of analysis, I feel that is important that competency of the individual carrying out the sampling is demonstrable.	2/11/2021 11:00 AM
5	Investigation of soils is different to that of a building fabric, ground investigations of soils is a specialism and one that is accredited through experience over a training course.	2/10/2021 1:28 PM
6	Contaminated land investigation is specialist work in it's own right which includes the presence and risks posed by asbestos. Asbestos is not a stand alone risk associated with soils.	2/10/2021 7:41 AM
7	Contaminated land is a multifaceted, complex subject which doesn't solely focus on asbestos	2/9/2021 2:52 PM
8	The CL industry is well placed to undertake site investigation and risk assessment for human health using current guidance including CAR-SOIL and SoBRA guidance documentation as well as expertise in following LCRM gov guidance for CL risk management.	2/9/2021 2:05 PM
9	Whilst accreditation for quantitative laboratory analysis is required, the existing provisions of the SCA blue book, SoBRA guidance and CAR-SOIL are more than sufficient for a suitable qualified brownfield land contamination consultant to understand the requirements for collecting soil samples from contaminated land where asbestos in soils may be present alongside existing sampling of made ground for other contaminants which UKAS are not proposing accreditation is needed.	2/9/2021 1:49 PM
10	I can't think of any immediate benefits that an accredited surveyor would provide to a survey. As ground practitioners we have the experience and knowledge to identify suspected asbestos containing materials in the ground in various states of degradation. The industry already has accreditation for laboratories which I believe to be sufficient. A code of practice for the identification and sampling of suspected asbestos containing materials in soil would be sufficient for ground investigation supervisors.	2/9/2021 1:30 PM
11	Because asbestos in soil is not the same kind of thing as asbestos in structures and therefore requires a fundamentally different approach, one tailored to soil contamination where asbestos is just one of a number of potentially hazardous substances.	2/9/2021 12:39 PM
12	Plenty of guidance is already available for the safe management of asbestos in soils.	2/9/2021 12:38 PM
13	Doesn't consider how guidance has evolved beyond the proposed scope, such as work by SoBRA. Asbestos in soils is a more complicated issue than asbestos within building fabric. Asbestos demolition surveys are supposed to ID asbestos so this can be removed, as an industry we have had to develop skills and interpret laws to deal with asbestos within recycled materials imported or attempted to import.	2/9/2021 12:14 PM
14	Asbestos surveyors are not qualified to assess contaminated land, and making them qualified would take years and a degree level conversion qualification. It would be better for UKAS to establish an accredited course (perhaps with input from asbestos surveyors) to ensure any knowledge gap from contaminated land professionals in asbestos are met. Contaminated land management is the overarching framework here, not asbestos. There is nothing unique about asbestos' exposure parameters which could not be overcome.	2/8/2021 4:32 PM
15	Someone who is able to demonstrate knowledge/experience but not necessarily be accredited would be sufficient	2/4/2021 3:04 PM
16	We investigate sites where more than asbestos is a contaminant of concern. I'm not sure UKAS have the required specialisms to determine whether someone should/should not be accredited.	2/3/2021 7:52 PM
17	asbestos is just one of many 'contaminants of concern', and is rarely found in isolation as part	2/3/2021 2:17 PM

of a land quality assessment - the overriding consideration should be knowledge and experience (competence) as a LQ site investigation professional.

18	This is not in place for all of the other contaminants we need to assess for within the context of soil contamination	2/2/2021 2:26 PM
19	The appropriate skills, knowledge and experience are required, which contaminated land professionals are required to demonstrate in a number of ways, including keeping abreast of the work and guidance in recent years associated with asbestos in soils and associated risks. An accreditation for ISO 17020:2012 is unlikely to provide this and whilst they may have an asbestos-related qualification, it may inadvertently lead to accredited asbestos surveyors completing work that is unrepresentative, inadequately controlled and for which they do not have the necessary contaminated land skills, knowledge and experience.	2/2/2021 11:39 AM
20	Grey area in investigation especially brownfield -	2/2/2021 10:39 AM
21	We should be pushing for competent persons accreditation under the NQMS not just Asbestos accreditation. Pushing for individual accreditation for individual aspects will eventually lead to gaps in brownfield redevelopment - there should be an overarching accreditation system aligned to the NPPF, LCRM and NQMS.	2/1/2021 3:13 PM
22	While an accreditation scheme may help raise standards it is no HSE seem to have no intention of enforcing this requirement for land investigations. It will disadvantage ConLand professionals while favoring inexperienced asbestos surveyors who lack the relevant qualifications for ground works and are unlikely to be following BS10175. Asbestos in soil CANNOT be addressed in isolation of other contaminants that pose risks to the surveyor and others	1/30/2021 1:17 PM
23	To establish Asbestos contaminated land should be accredited to a competent standard.	1/29/2021 6:24 PM
24	In our experience surveys done by building surveyors tend to fail to recognise that more information is needed other than just recording asbestos and testing. A lot more detail is required in terms of ACM nature, soil type, nature and context of the contamination and how it relates to contamination on the site.	1/29/2021 4:59 PM
25	Staff training is given to ensure site workers involved with sampling potentially asbestos-impacted ground are able to carry out at least a preliminary visual inspection of materials.	1/29/2021 2:36 PM
26	Asbestos on the external surface is not normally included in building reports. It should be an included provision as is potentially an equal risk.	1/28/2021 5:32 PM
27	It's a minor part of the whole competency range required for CL investigations. The H&S aspects are covered by a specific asbestos in soil training course for non-licensed work, the analysis part is covered by laboratories with accreditation.	1/28/2021 10:57 AM
28	The suggestion that asbestos surveyors with ISO 17020 are qualified to observe and assess brownfield and contaminated land without the formal training, experience, competency or accreditation that is established as a requirement in the UK is wrong, and will set a precedent for other sectors which should not be set.	1/28/2021 9:55 AM
29	Contaminated land professionals already have access to appropriate asbestos in soil awareness training, guidance and standards such as CAR:SOIL. There may be a benefit in having an asbestos surveyor inspect the surface of the site for the presence of asbestos prior to investigation.	1/28/2021 9:43 AM
30	The problem as I see it is that UKAS Accreditation only covers the process and that a UKAS accredited person/company undertaking a survey is only following the correct procedures. It does not cover quality nor the required experience to undertake these works effectively. A recently trained P402 surveyor undertaking these works in accordance with the proposed ISO would technically be doing it to UKAS but they would not have the requisite experience (and this is the critical bit the ISO is missing). Just because you can follow the procedure does not mean what you are doing is necessarily correct - unfortunately contaminated land investigation is rarely black/white 0 there are multiple shades of grey.	1/28/2021 9:02 AM
31	It is required to provide a clear industry standard on the appropriate approach to assessing asbestos in soil.	1/28/2021 8:47 AM
32	All UKAS accreditation provides is comfort that you follow the stated procedure you say you are using (which may or may not be the right one) and that all equipment is calibrated (which	1/28/2021 8:09 AM

may or may not be the right equipment for that situation) and that staff are trained (which may or may not be the right procedure for that specific activity that's actually needed, for the specific situation or site). It does not, and cannot cover interpretation, and the investigation and assessment of contaminated land is as much (if not more) about interpretation, as it is procedure. In addition, it is difficult to devise a UKAS accredited procedure (that is repeatable) that would meet the vast variations in ground conditions the contaminated land (and geotechnical) industry encounter every day. The asbestos industry companies (who would obtain this UKAS accreditation) do not have experience or the expertise with regards to asbestos in the ground, not to mention the vast myriad of other Contaminants of Potential Concern. Finally, they are also unlikely to have the experience with dealing with other sub surface risks (geotechnical issues, service strikes, trial pit collapse, UXO, working near plant etc). Asbestos is just one small part of the big picture. In addition, most Phase 1 desk studies on a site with previous development history would likely note asbestos within Made Ground as a plausible risk. Would this result in every investigation on sites which may contain Made Ground (which is most sites) an 'asbestos site investigation' requiring UKAS accreditation?

33	Not applicable qualification and experience and knowledge to manage risk can be demonstrated without UKAS	1/27/2021 9:07 PM
34	Contam land professionals need training on the specific technical issues involved with sampling asbestos in soil as well as in H&S. The sampling methods and requirements (and H&S risks) are radically different in the ground to buildings and training suffices. It is a quality issue covered better by ISO 9001 than a seperate accreditation scheme	1/27/2021 6:37 PM
35	Land is often contaminated with more than one contaminant in more than one phase (gas, vapour, free phase, solid and dissolved). Investigations and surveys have to cover a multitude of potential scenarios requiring specialist knowledge. That said an asbestos specialist concerned with asbestos in soil contamination could be a useful addition to a team.	1/27/2021 5:34 PM
36	Many consultancies working in contaminated land do not have in house asbestos surveyors and may not have suitable insurance cover to comment on or provide advice on certain aspects of asbestos in the ground. In certain circumstances it may be appropriate to seek advice and on site technical support from an accredited asbestos surveyor. The presence of asbestos (ACM, fibres) is very common on many previous industrial site a previously developed land, and for most site investigations comprising sampling and laboratory testing of soil and made ground with suitable health and safety management procedures in place the need for an asbestos surveyor is not necessary.	1/27/2021 3:04 PM
37	Accreditation specifically for asbestos surveying is welcome - BUT providing it aligns with all other relevant guidance and standards in assessing contaminated land. Such accreditations MUST cover the requirements of a Competent Person - to include land contamination as a whole and NOT just for asbestos.	1/27/2021 2:40 PM
38	The existing contaminated land legislative regime and associated LCRM guidance already provide a robust framework. This involves the assessment of all contamination risks, not just asbestos.	1/27/2021 1:33 PM
39	Asbestos is already taken into account in the rigorous contaminated land assessment undertaken by geo-environmental professionals.	1/27/2021 12:02 PM
40	This is a different skill set from buildings and building fabric. In a building it is there or not there, in soil it is randomly occuring	1/27/2021 11:43 AM
41	Asbestos should be considered as any other contaminant under current risk assessment (LCRM). It is important that it is considered within the broader contaminated land assessment and not in isolation.	1/27/2021 11:29 AM
42	Other avenues like SiLC and SoBRA already exist. Uptake would be low. Professionals in the sector already have guidance to follow.	1/27/2021 10:58 AM
43	What is so special about asbestos that it needs its own accreditation standard to be able to be sampled. What is wrong with BS10175 and BS5930 that is it not possible to sample soil for asbestos without yet another accreditation?	1/27/2021 10:55 AM
44	The discipline of surveying contaminated land for asbestos is already covered by other professional qualifications in contaminated land risk assessment and other industry led and Government endorsed qualifications notably those regulated by SiLC and SoBRA	1/27/2021 10:54 AM

45	however, clear guidance and standards are required	1/27/2021 10:47 AM
46	No as different risk profiles to buildings and different skill sets required.	1/27/2021 10:43 AM
47	Surveying of contaminated land is undertaken by suitably trained and experienced professionals to established methodologies and as part of a holistic risk based process. the presence of asbestos is a part of this - to have a separate process for surveying asbestos would be a retrograde step.	1/27/2021 10:19 AM
48	Already covered in 10175	1/27/2021 10:01 AM
49	The accreditation is not relevant to soils, and asbestos in soils is unlikely to look the same as in buildings due to weathering	1/27/2021 9:24 AM
50	The issues associated with the identification and management of asbestos in soils are significantly different from those associated with undertaking a survey of a built structure e.g. familiarity with soil structure, familiarities with soil sampling, the physical and visual effects on ACMs of being incorporated in soils	1/27/2021 9:13 AM
51	I see no need. Plenty of qualifications already exists. CAR 2012 requires suitable training, we can audit staff suitability against CAR 2012 training requirements	1/27/2021 8:58 AM
52	More industry guidance is required as to how to suitably investigate this discrete soil contaminant.	1/26/2021 9:58 PM
53	Ukas for buildings is one thing, but contaminated land is very different. My experience is that building surveyors are ok for building but don't understand the ground at all.	1/26/2021 9:48 PM
54	Asbestos in the ground assessment is a specialist contaminated land issue for professionals in that field.	1/26/2021 8:54 PM
55	We have accreditation eg silc and SoBRA. Given the complexity of asbestos some aspects are still being developed to aid interpretation. It is too early to try to develop a standard to support an asbestos risk assessment.and jeopardises innovation and basing it on 2012 is even worse. When demolition rubble has no asbestos in it will I believe current asbestos accreditation for buildings works Sort that out first.	1/26/2021 8:19 PM
56	I agree that proposals do not understand the contaminated land investigation process; there is appropriate technical guidance available for assessment of asbestos in soils	1/26/2021 7:04 PM
57	Surveying for asbestos in soil is already adequately covered elsewhere in other guidance.	1/26/2021 6:56 PM
58	<ul style="list-style-type: none"> • If the suspicion that asbestos likely to be present during a Phase 1 desk study, does this automatically make the investigation an 'asbestos site investigation' requiring UKAS accreditation. o If so, consultants doing work on almost every brownfield GI will need to hold the accreditation or have someone who holds the accreditation present during the works. • Should visible ACM be identified during a standard geo-environmental GI (where asbestos was not anticipated)would that automatically mean it would now be considered and 'Asbestos ground investigation' requiring UKAS. o If so, then would the work need to stop incur increased costs due to the unanticipated ACM. • Is it anticipated that this accreditation will be taken up by current geo-environmental consultancies, or is it more likely that existing asbestos consultancies will be the majority of the uptake? o Asbestos consultancies are unlikely to have sufficient knowledge and expertise to general contaminated land surveys this could leave them open if they find the asbestos but miss other contaminants they are not familiar with. • Will this accreditation restrict all non-UKAS accredited companies/personnel from conducted asbestos site investigations? Or will it be similar to the way Asbestos Survey are conducted (ie. UKAS accreditation for surveys is not an absolute requirement to conduct building surveys it is more focussed on P402 training, competence, experience and insurance)? o This is likely to have a significant and unbalanced impact on self-employed, sole traders and smaller geo-environmental consultants. • What training would be required to provide prove of competency? o The BOHS currently offer no such course and the P402 is focussed on buildings alone. • Costs of ground investigation are already high and developers are already squeezing GI budget. o This is likely to increase the fees for the works quite substantially, which could lead to less trial pits, borehole, window samples being commissioned and therefore less detailed site data in general. • Will those undertaking UKAs accredited surveys from asbestos consultancies need to comply with the requirements of 'Land contamination: risk management (LCRM)? o I.e. land contamination risk assessment (RA), PRA's, GQRA's, DQRA's desktop studies, Phase 1, options appraisals, remediation strategies, verification etc. o There will likely 	1/26/2021 4:24 PM

be quite a disconnect if asbestos GI's and assessments are removed from the general geo-environmental consultancy sector. • How does UKAS intend to inspect an accredited consultancy for compliance? o For buildings surveys, four-stage clearances this is done by a UKAS inspector witnessing the consultancy in the field and assessing compliance, will this be the case for 'asbestos ground investigations'? o Asbestos in soils investigations wont be as regular as building surveys and each one will come with a very different set of criteria and issues to be resolved. • Will the accreditation take account of the host of other risks involved with excavating in the ground? o There could be situations where inexperience consultancies wrongly think that asbestos is the biggest risk when conducting an intrusive ground investigation o E.g. service strikes, unstable excavations, working in close proximity to plant, other harmful contaminants. o Will the UKAS assessor be fully versed and competent to assess a consultancies competence at dealing with these risks other than asbestos? o Will the accreditation include and assessment of the write up of a site investigation and the interpretation of the data in a contaminated land, planning and remediation scenario?

59	There are multiple accreditation's for environmental assessments and none provide any real benefit. I struggle to see any benefit of such a scheme.	1/26/2021 4:09 PM
60	Working in contaminated land is very different from building surveying - 2 different skill sets Asbestos in soils is picked up in the lab (generally) not in field observations (except for tile, roofing sheet etc)	1/26/2021 4:03 PM
61	It is a question of what you can be accredited for. Interpretations and opinions are outside the scope of UKAS accreditation, and it is the interpretation and opinion which is of critical importance. All surveyors should be trained to carry out the works, but is UJAS the most appropriate accreditation body and what will this cover in practical terms. What is the differentiator, and will it be abused as a marketing tool?	1/26/2021 3:35 PM
62	This might result in asbestos surveyors (conversant with building surveys relating to management, refurbishment or demolition) undertaking the work of a contaminated land professional without the appropriate training or experience.	1/26/2021 3:35 PM
63	the work is done by competent contaminated land consultants using CARE 2012, CAR-SOIL guidance and other industry guidance such as CIRIA C733, and with certified asbestos awareness training courses	1/26/2021 3:33 PM
64	In my experience, contaminated land firms do not have the required level of asbestos competency	1/26/2021 3:31 PM
65	there is existing guidance in place for contaminated land professionals	1/26/2021 3:13 PM
66	UK contaminated land professionals understand the ground and the implications on safety.	1/26/2021 3:04 PM
67	The investigation and sampling of soils for asbestos could be incorporated within BS 10175:2011+A2:2017. The investigation and sampling protocol should be derived by the experts and those qualified in the field of contaminated land investigations	1/26/2021 3:03 PM
68	This a constant concern on some projects where the client has appointed the analyst and they do not have the knowledge CLAIRE or CIRIA guidance and the additional knowledge and competency needed to work on such a site. They sometimes think we are crazy when we ask about setting up a wind sock so that they can assess the best position of perimeter monitoring, let alone turning up without any wellies.	1/26/2021 3:01 PM
69	the majority of site investigations may potentially encounter a small amount of asbestos as it is identified as a potential contaminant on most brownfield sites with development prior to 2000. There is a need for asbestos surveyors in site assessment but only those where the risk is high such as a former asbestos products manufacturing facility (such as brakes, corrugated cement sheets and for uses where asbestos products were used a lot such as carriage works and or an asbestos landfill.	1/26/2021 2:40 PM
70	The wrong discipline will be overseeing the contaminative land investigation process. i.e an asbetosos surveyor will be undertaking the role as set out for a contaminated land expert.	1/26/2021 2:40 PM
71	Dealing with asbestos in soils is different to dealing with it in buildings and should be lead by a contaminated land specilaist (who is trained and competent in asbestos awareness) and supported by an asbestos specialist only when necessary	1/26/2021 2:39 PM
72	Asbestos is just one of many contaminants of concern that may be present on previously developed land. UKAS accreditation is not required for investigating other contaminants, why	1/26/2021 2:30 PM

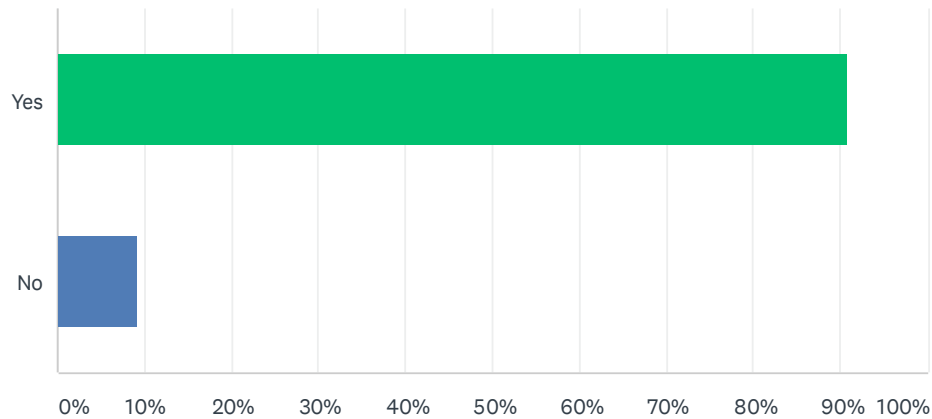
should asbestos be different. The land contamination community in the UK has made a concerted effort in recent years to train contaminated professionals in the technical and health and safety requirements for investigating asbestos contaminated soil. UKAS accreditation for asbestos in soil is superfluous to the needs of the UK land contamination community.

73	Asbestos is typically a small element for a wide range of contaminants, and often at very low levels/concentrations. Accrediting this one element does not make sense and may end up with the wrong people on site	1/26/2021 2:27 PM
74	The principles applied to the surveying of buildings cannot be appropriately applied to the management and assessment of asbestos within soils and will ultimately lead to duplication of effort by two separate professionals.	1/26/2021 2:25 PM
75	Asbestos is present on nearly all brownfield sites. Given that the role of an asbestos surveyor is more streamlined than that of a CL professional who is considering a variety of contaminants, it would surely seem more sensible to have apply accreditation to the role of the asbestos surveyor rather than to the discipline of CL associated with asbestos. The reverse just seems counter intuitive.	1/26/2021 2:20 PM
76	Mechanism training and awareness are already ubiquitous in the contaminated land industry. This brings a tier of spending and poorer work not needed.	1/26/2021 2:13 PM
77	It is already covered in UK guidance and does not need to be treated separately - it is only one contaminant of concern in a contaminated land investigation	1/26/2021 1:59 PM
78	UKAS accreditation is a sledgehammer to crack a nut. Having taken a process through the UKAS accreditation scheme I know how onerous it is and how process driven it is. A boxed process isn't necessarily fit for every site.	1/26/2021 1:54 PM
79	without specialist training and some form of competence in carry out ground investigation and contaminated land risk assessments, I cannot see how they can demonstrate sufficient experience to understand the risk and remedial actions required.	1/26/2021 1:52 PM
80	Sampling and surveying of soil is currently undertaken competently by trained geo-environmental engineers and consultants, who are conversant with the ground investigation process.	1/26/2021 1:42 PM
81	Contaminated land consultants already provide assessment of asbestos on brownfield sites. If a surveyor is just accredited for asbestos, there could be other contaminants that are not assessed resulting in substantial liabilities for both the surveyor or client.	1/26/2021 1:22 PM
82	There is already the UK Asbestos Training Association (UKATA) which is well established in UK industry to provide training from asbestos awareness up to non-licensable and licensable work with asbestos. Fugro treats Asbestos Awareness and even non-licensable work as mandatory training for all ground investigations and would, in the event of locating licensable work, contact a specialist to proceed with removal of asbestos. Fugro would not continue working in an area with known asbestos.	1/26/2021 12:39 PM
83	There is adequate guidance & schemes that now exist. These take account of the unique, complex & multidiscipline nature of contaminated Land industry & regimes that apply. The addition of this requirement adds extra cost & will not take account of the above	1/26/2021 12:22 PM
84	Because it would be very difficult to show competence in its application, all persons who should be undertaking this sort of work should be competent to do so and applying the appropriate standards anyway and its a waste of money, there is no need for this type of specialist requirement	1/26/2021 12:20 PM
85	Surveying of contaminated land for asbestos requires a different knowledge base to the surveying of a building for Asbestos	1/26/2021 11:41 AM
86	I believe this would be a very bad move for the industry. The main reason is that asbestos building surveyor have little or no knowledge or training of contaminated land assessment...	1/26/2021 11:38 AM
87	The surveying of land for all contamination is already extremely well covered by existing guidance and standards. This document would only serve to place an inappropriate focus on a single aspect and would lead to ambiguity, conflict and misunderstanding.	1/26/2021 11:37 AM
88	It is unwise to differentiate between issues of asbestos in the soil and other contaminants and contaminated land assessments require a far greater range of skills and experience than just	1/26/2021 11:33 AM

	asbestos assessment	
89	Generally not appropriate for investigation and risk assessment of asbestos where present outside of buildings. Skill set in ISO17020 doesn't cover common land quality investigation tools and approaches.	1/26/2021 11:03 AM
90	This will lead to investigations missing out asbestos testing where it maybe should have been undertaken. It will be associated with additional cost to industry with limited benefit. It will be difficult to enforce. Sampling for asbestos is generally needs to take into account of site specific factors which wont be accommodated. Industry are still working on guidance for best practice for sampling analysis and assessment so this guidance is very premature.	1/26/2021 10:56 AM
91	There is already sufficient UK good practice guidance and there is no justification for treating asbestos differently to other contaminants. It is however noted that accreditation is required to undertake land contamination surveys in other European countries, and it could be argued that accreditation is a potential mechanism for improving standards in our industry	1/14/2021 10:08 PM
92	competent contaminated land professionals should be able to investigate contaminated land for asbestos without the need for an accreditation certificate. This is not the same as asbestos surveying in buildings and structures	1/12/2021 9:32 AM
93	Whilst not required in an absolute sense, it is clear that some clients do not understand the competency of the firms they employ to carry out such surveys. Where asbestos in a building is seen as the clear priority risk, the potential risk of presence in the ground can become a secondary consideration in the professional appointment process.	1/11/2021 5:23 PM
94	Derelict sites commonly have ACM debris at the surface and flytipping which are often not documented properly in walkovers for desk studies. Asbestos inspection will ensure further investigation works are planned properly and safely.	1/11/2021 10:49 AM
95	It is adequately covered by existing standards and CAR :SOIL	1/8/2021 6:23 PM
96	Asbestos is only one contaminant of concern in the ground. If a separate intrusive investigation is done for asbestos, this then leaves disturbed ground and unsuitable for a ground investigation to provide useful data and may in itself create pathways for contamination. For example, what is asbestos surveyor going to do when a pool of LNAPL is found?	1/8/2021 2:17 PM
97	Asbestos surveyors for buildings will know very little about the investigation or assessment of contaminated land and are unlikely to have the required experience, training or expertise to do the job well. It could also lead to a very significant backlog if all work needs to be 'accredited' by an asbestos surbeyor.	1/8/2021 12:57 PM
98	It will not be relevant to contaminated land survey requirement.	1/8/2021 12:25 PM

Q2 Do you consider there is a risk that an asbestos surveyor (if accredited as proposed under ISO 17020:2012) may find themselves in a position of leading/co-ordinating/supervising a contaminated land intrusive investigation as a whole?

Answered: 119 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	90.76%	108
No	9.24%	11
TOTAL		119

#	IF YES WHAT DO THINK THE PRINCIPAL RISKS COULD BE TO THE OUTCOME OF THE INTRUSIVE INVESTIGATION AS A WHOLE?	DATE
1	this should be specialist input only - not to take on the investigation, however they may be the opportunity to provide a watch and brief throughout the process if the site has previously recognize the risk	2/18/2021 1:41 PM
2	Its possible though I wouldn't expect a competent professional in any field to provide services that relate to matters outside of their area of expertise, i suppose some practitioners always overreach themselves	2/16/2021 2:39 PM
3	I have seen this happen and the Principal Asbestos (in Buildings) Surveyor was strongly criticised for a number of errors he made when advising the client about a landslip that contained asbestos waste that was being investigated and remediated.	2/16/2021 12:21 PM
4	The possibility that the asbestos surveyor could end up instructing and directing intrusive works on sites with buried utilities and/or non-ACM contamination present without the knowledge or experience of how to effectively manage them.	2/11/2021 11:00 AM
5	The question will be if the surveyor is competent to run a ground investigation from both a technical and H&S point of view acting as the Principal Contractor. Sampling for the presence of asbestos is only one aspect of a ground investigation and it would be necessary to ensure a surveyor is competent to fulfill the roles required. It may end up multiple persons being present on site which then causes commercial issues.	2/10/2021 1:28 PM
6	The focus would be on asbestos with potentially more significant risks to human health, controlled waters or other receptors being missed or not fully investigated.	2/10/2021 7:41 AM
7	Sampling soils for asbestos and other contaminants they are not familiar with Not having relevant training, experience or competency for investigating potentially contaminated sites - including client specific requirements Not being familiar with current best practice and guidance Not being aware of CDM roles and requirements which are required as part of intrusive investigation Not being aware of the contaminated land objectives or follow on risk assessment approaches / methodologies	2/9/2021 2:52 PM
8	Guidance might be confusing for clients to understand the appropriate level of expertise required for a CL investigation.	2/9/2021 2:05 PM
9	Made ground is generally found on all brownfield sites in the UK and asbestos is just one of a number of potential contaminants that may be present and which a contaminated land consultant is looking for. The proposed accreditation suggests that EVERY site would therefore only be possible to investigate with an accredited asbestos surveyor on hand to supervise the works which is not practical. A specialist asbestos surveyor would also not be trained in the correct procedures for avoidance of below ground utilities and would not be able be competent in understanding wider brownfield land contamination risks. This risks the intrusive investigation process becoming untenable and also risks damaging the holistic approach to land contamination risk management with every individual onsite only focused on one niche aspect	2/9/2021 1:49 PM
10	I can't see them being allowed to supervise or lead a ground investigation, at least not without the necessary knowledge and experience in the field prior to accreditation. However, they could end up being employed to co-ordinate an intrusive investigation in so far as permitting excavations. An accredited surveyor without the ground investigation knowledge and experience could miss suspect materials that an experienced ground investigation practitioner would otherwise have sampled and sent for testing. An investigation may also be restricted by an accredited surveyor that does not understand the risks to ground investigation staff. Therefore the objectives of the investigation may not be met where made ground is present or there will be additional cost to clients for additional preliminary phases of investigation to rule out the presence of asbestos prior to the main ground investigation.	2/9/2021 1:30 PM
11	This would only be acceptable provided the accredited asbestos surveyor was also fully qualified, experienced and accredited in contaminated land investigation. One who was only competent in asbestos in structures would be unqualified to undertake contaminated land work.	2/9/2021 12:39 PM
12	Asbestos is only one part of what we look at. Our colleagues in the contaminated land industry have years of experience and knowledge about all different areas of contaminated land. Unless the surveyor has to learn all of this as part of the role then it is a risk that other significant aspects of contaminated land will be missed. I don't think you can just learn this through a	2/9/2021 12:38 PM

quick training course either. The knowledge being put to use when planning these investigations comes from a team of experienced people.

13	Lack of understanding on wider contaminated land risks, incorrect scope or constraints. Asbestos work would be very narrow defined scope. current asbestos reports are so simplistic it really wouldn't tie into sites.	2/9/2021 12:14 PM
14	Asbestos surveyors are not qualified to assess contaminated land, and do not achieve the definition of Suitably Qualified Person under the National Planning Policy Framework.	2/8/2021 4:32 PM
15	It is not necessarily appropriate for a Asbestos Sureyor to supervise a contaminated land investigation compared with a contaminated land professional with asbestos knowledge	2/4/2021 3:04 PM
16	Asbestos surveyors know literally nothing about land contamination - as I know very little about building surveying.	2/3/2021 7:52 PM
17	surveying asbestos in buildings is a completely different skill (and experience / competence can be gained much more readily) than for a Ground Engineer.	2/3/2021 2:17 PM
18	They are not versed in wider contamination and CSM understanding.	2/2/2021 2:26 PM
19	Similar reasons to those noted above. Whilst important, asbestos is only one of may contaminants that may be found. An asbestos surveyor leading a contaminated land investigation may not have the skills, knowledge and experience that are required. This may lead to an unrepresentative investigation and may compromise the safety of the site team if they are not familiar with intrusive investigation work.	2/2/2021 11:39 AM
20	Asbestos surveyors are not trained to consider the risks from other sources of contamination and as such may miss these risk leaving site redevelopment inadequate and long term liabilities.	2/1/2021 3:13 PM
21	Asbestos being the main driver at the expense of all other geotechnical and geoenvironmental considerations, a lack of appreciation of the H&S considerations (trial pit collapse, and ground gas hazards and chemical and biological contamination etc.)	1/30/2021 1:17 PM
22	I'm not sure	1/29/2021 6:24 PM
23	Asbetso is opnly ione part of	1/29/2021 4:59 PM
24	A building surveyor, generally, could not be expected to have the skills, knowledge or experience to carry out an intrusive ground investigation.	1/29/2021 2:36 PM
25	It would compromise H&S aspects of running a construction project (most GIs are considered to be construction under CDM regulations). Therefore that person would need to be competent in all aspects of GI - including experience and training.	1/28/2021 10:57 AM
26	The investigation will not follow the established principals of contaminated land assessment, will not yield an accurate or reliable assessment, and will ultimately lead to greater risk to all receptors.	1/28/2021 9:55 AM
27	Clients will not necessarily understand the difference in roles between an asbestos survey and a contaminated land survey and there is a danger that they will ask for an accredited survey which may not investigate the site adequately. An asbestos surveyor is unlikely to meet the definition of a competent person as defined in LCRM. There is a danger that the investigation will not take into consideration the overall conceptual site model resulting in a failure to adequately address potential pollutant linkages. For some multidisciplinary consultancies there may be the option of having a contaminated land professional and an asbestos surveyor on site but this will drive up the cost for the Client.	1/28/2021 9:43 AM
28	Asbestos is a part of the wider issue associated with potentially contaminated soils, only in some circumstances would a contaminated land investigation focus solely on asbestos issues (it does happen but it is probably less than 10% of the time). There is therefore a real potential issue that as soon as asbestos is identified that all other potential contaminants, some of which may be far more dangerous are bypassed just because asbestos is present.	1/28/2021 9:02 AM
29	An asbestos surveyor is without the relevant training, experience, competency or accreditation for investigating potentially contaminated land, which is far more complex than solely asbestos concerns.	1/28/2021 8:47 AM
30	If the asbestos surveyor does not possess relevant experience in land contamination	1/28/2021 8:14 AM

surveying/investigation, this could lead to under/over appreciation of risks other than those relating to asbestos. Examples could include unnecessary gas monitoring assessments where no potential source is present, upon inspection of the site and surroundings.

31	I believe the asbestos industry would push the UKAS accreditation as proof of competency. Whilst this could not be further from the truth, clients may not see the difference. Lack of appropriate training and experience of planning, supervising and reporting site investigation works (at all levels from site supervision, through to management) may result in H&S risks being missed, or not appropriately mitigated. Lack of appropriate training and experience may result in other Contaminants of Potential Concern being missed as asbestos would be the focus. The disconnect between contaminated land risk and geotechnical risk would be exacerbated. These are two sides of the same coin and need consideration on all jobs. Finally, I strongly believe there would be a significant risk of increased disposal of soils containing asbestos fibers off site to landfill and restrict the re-use of soils containing asbestos fibers.	1/28/2021 8:09 AM
32	Asbestos surveyors do not understand the scope or objectives investigations focussed on asbestos without even starting to consider other contaminants of concern.	1/27/2021 9:07 PM
33	The risks and technical understanding involved with supervising a contaminated land intrusive investigation are very different to those involved with buildings. It would result in inappropriate contaminated land investigations. Note that where asbestos is found in the ground it is generally found with other types of contamination. It takes longer to train a competent person to run a site investigation in contaminated ground than it does to train an asbestos surveyor.	1/27/2021 6:37 PM
34	As noted above someone specialising in asbestos could find themselves having to deal with many other aspects of contaminated land leading to the potential for data to be missed.	1/27/2021 5:34 PM
35	Although I have answered No, I considered this needs an explanation. It is unlikely that a client (landowner, developer etc) would appoint an asbestos surveyor to carry out an investigation, and if it were necessary to have an asbestos surveyor on site, it is likely that they would be provide a supporting technical role rather than leading, co-ordinating or supervising a site investigation. Asbestos fibres in made ground which are not visible to the naked eye are commonly recorded by the testing laboratory and there is little benefit having an asbestos surveyor on site for such circumstances.	1/27/2021 3:04 PM
36	Land owners/developers will assume the asbestos surveyor is accredited for anything related to land contamination - not just asbestos.	1/27/2021 2:40 PM
37	- Miss key risks - No joined up thinking	1/27/2021 1:33 PM
38	The asbestos surveyor, if no previous experience of contaminated land as a whole, will not assess the risk from other contaminants and the risk from contaminated land could remain if solely based on an investigation by the asbestos surveyor. Clients rarely want to pay more than they have/need to and to roll whole 'contaminated land' and asbestos surveys into one would be a way they could seek to save money.	1/27/2021 12:02 PM
39	My main concern would be lack of experience with ground investigation specific health & safety requirements, soil sampling (representative), scheduling and general understanding of ground model and interaction of soil/groundwater. The surveyor would not necessarily have experience of risk assessment and risk communication in contaminated land context.	1/27/2021 11:44 AM
40	H&S issues associated with investigations, not understanding soil properties, services, etc	1/27/2021 11:43 AM
41	for the reasons above, the evaluation of risk from Asbestos should not be looked at in isolation from other environmental/geotechnical investigations. It is important that the site is assessed in its entirety. There are more immediate practical considerations too including service strikes, trial pit collapse, other contamination, undermining buildings etc that is likely to place an 'accredited surveyor' at greater risk than a competent contaminated land professional.	1/27/2021 11:29 AM
42	Asbestos surveying and soil investigations are chalk and cheese. I imagine there would be many issues with the investigation, which requires an understanding of the site CSM.	1/27/2021 10:58 AM
43	There is always a risk that someone will do something they are not competent to do, which risks any GI not achieving what it set out to do ,or creating additional problems. Why would an accredited asbestos surveyor suddenly think they were capable of leading a complex GI ?	1/27/2021 10:55 AM
44	a complete lack of understanding of the principles of contaminated land risk assessment and hence appropriate mitigation/remediation measures	1/27/2021 10:54 AM

45	skewed focus on asbestos when other contaminants of concern may present long term or acute issues. inappropriate investigation techniques. Loss of holistic approach to risk.	1/27/2021 10:47 AM
46	not really.	1/27/2021 10:43 AM
47	Contaminated land assessment is performed as a risk based process, involving a wide variety of specialised knowledge, techniques and skills, to a plethora of standards and methodologies. Asbestos surveyors would not have appropriate skills to perform what is part of a much wider complex process.	1/27/2021 10:19 AM
48	Contractual claims HandS considerations	1/27/2021 10:01 AM
49	Cost cutting is likely to reduce site presence, leaving the only required member of staff to supervise.	1/27/2021 9:24 AM
50	Lack of familiarity with the wider technical and safety issues associated with ground investigation. Potential for "double handling" and increased costs through use of an accredited surveyor and a ground investigation professional	1/27/2021 9:13 AM
51	More a "don't know" than a yes. But there is a slight risk the asbestos issue will be seen to be more important than other contaminants, when in fact it may be a lesser issue	1/27/2021 8:58 AM
52	Poorly conducted investigations with a lack of understanding of the wider contaminated land assessment process. Undercutting of fees and loss of work for the contaminated land professionals through asbestos surveyors offering poor quality work to uninformed clients.	1/26/2021 9:58 PM
53	Lack of knowledge of the ground and the wider variety of risks.	1/26/2021 9:48 PM
54	The principal risk might be that the investigation is not coordinated / targeted appropriately due to the lack of contaminated land experience.	1/26/2021 8:54 PM
55	Too prescriptive and less able to react to findings and take multidisciplinary approach required inappropriate sampling for non-asbestos and over emphasis on asbestos sampling to the neglect of more significant issues.	1/26/2021 8:19 PM
56	inappropriate investigation or not complaint with standards and technical guidance for all aspects except asbestos soils	1/26/2021 7:04 PM
57	Likely that the investigation would not be undertaken by a suitably competent individual as defined in LCRM and thus be worthless. ISO standard isn't needed given the advice already out there.	1/26/2021 6:56 PM
58	Complete lack of training in the understanding of ground conditions, health and safety associated with boreholes and trial pits, appropriate chemical sampling techniques and the implications of what they are undertaking with regards to the wider ground model area.	1/26/2021 4:30 PM
59	See Q 1 answers	1/26/2021 4:24 PM
60	It would be led by an inexperienced individual to the detriment of the output.	1/26/2021 4:09 PM
61	Get the asbestos and miss the rest of the contamination I have seen this done - it took 2 years and a lot of time to sort what the asbestos surveyors missed on site.	1/26/2021 4:03 PM
62	That by employing an accredited surveyor, there is an expectation from Clients that an accredited report is enough, in isolation, when the reality is this only part of the process.	1/26/2021 3:35 PM
63	The site investigation might not cover all relevant aspects required to allow an appropriate assessment of potential contamination issues.	1/26/2021 3:35 PM
64	Non asbestos contaminants not adequately dealt with resulting in risks to workers, risk to future site occupiers and liabilities for land owners.	1/26/2021 3:33 PM
65	No significant risk provided the asbestos professional has the required competency - this is a very loaded question.	1/26/2021 3:31 PM
66	An asbestos surveyor is not competent to lead an SI. From SSSTS or SMSTS training and to CDM training as principal contractor and generally understanding ground conditions and their stability / chemical risks. I cannot foresee any benefits.	1/26/2021 3:04 PM
67	An asbestos surveyor will have experience of surveying buildings but not necessarily have the experience or qualifications to carry out contaminated land investigations to the LCRM protocol	1/26/2021 3:03 PM

and thus the investigation could be carried out incorrectly and essential potential contaminants could be missed and a site could be classed as very low risk when in fact the risk rating could be significantly higher.

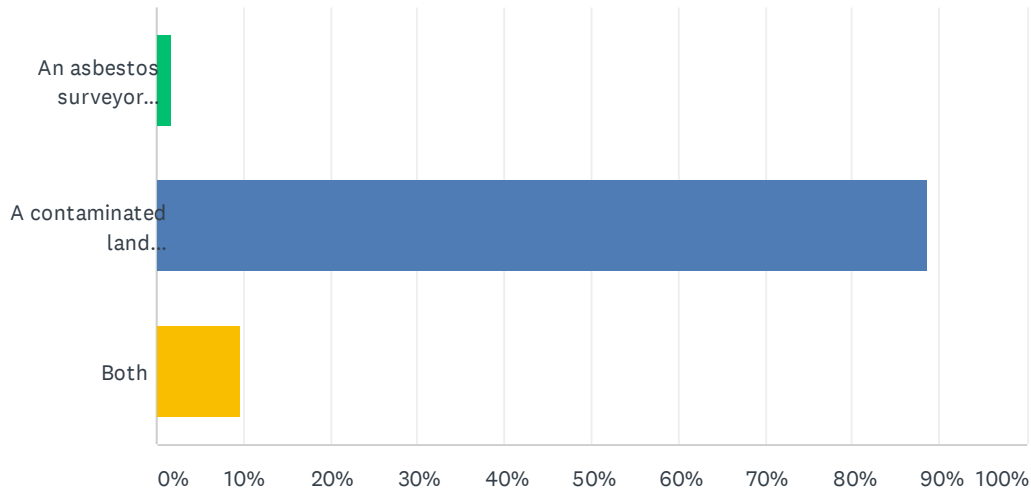
68	Lack of knowledge and their need to be firm with clients that they need to appoint a third party to sign off site, such as the original company who undertook ground survey or appoint an independent company to oversee carry out satisfactory completion of work sign off. We have also had many occasions where analysts have wrongly assessed work categories.	1/26/2021 3:01 PM
69	On the vast majority of sites there is as much risk from exposure from other contaminants as asbestos and therefore there will be, potentially be a cost addition that is disproportionate to the risk	1/26/2021 2:40 PM
70	The asbestos surveyor will not have the adequate background and training to lead an intrusive investigation and will have little to know knowledge of correct procedures and other chemical sources	1/26/2021 2:40 PM
71	Dealing with asbestos is one small part of managing a GI - and therefore focussing on this one aspect could result in other more 'risky' areas not being suitably dealt with.	1/26/2021 2:39 PM
72	Asbestos surveyors are skilled at identifying ACMs in buildings. They are not familiar with the inspection, logging and sampling of soils. Whilst they might identify the asbestos in the ground, there is a real concern that they will not characterise the soil quality adequately with respect to other contaminants and geochemical and geotechnical properties.	1/26/2021 2:30 PM
73	Buildings asbestos surveys are totally different to soil investigation, and should be assessed by appropriate contaminated land specialist not asbestos surveyors	1/26/2021 2:27 PM
74	The contaminated land assessment would not be undertaken by a suitably qualified person under relevant guidance, therefore would not be fit for purpose. Or the investigation would be undertaken with duplication of effort from two differing professionals.	1/26/2021 2:25 PM
75	The asbestos surveyor is unlikely to be covered by insurance for CL investigation...unless part of a multi disciplinary of course.	1/26/2021 2:20 PM
76	Asbestos surveyors not qualified to consider other aspects of contaminated land works - we would have to get all staff accredited or have a second person onsite	1/26/2021 2:13 PM
77	Will not consider all other aspects of a contaminated land investigation	1/26/2021 1:59 PM
78	The outcome becomes driven by a fixed process rather than people using their brains	1/26/2021 1:54 PM
79	Misunderstanding of the data required to support a contaminated land risk assessment.	1/26/2021 1:42 PM
80	Risks to future users, financial liabilities to the client and social/environmental liabilities to the local authority from contamination that is not identified or assessed using a robust CSM approach.	1/26/2021 1:22 PM
81	The Asbestos Surveyor will not necessary understand the wider H&S risks associated with Contaminated Land projects, nor understand wider (specialised) redevelopment needs or have the experience or knowledge of Risk Assessments & the CL regime. CL is a multidiscipline industry that needs the CL specialist; with knowledge of the wider requirements	1/26/2021 12:22 PM
82	Lack of knowledge regarding how to conduct a contaminated land site investigation	1/26/2021 11:41 AM
83	Possibly... As stated above, the asbestos building surveyors have no knowledge, training or experience of contaminated land assessment...	1/26/2021 11:38 AM
84	The investigation and assessment of land contamination requires an extremely high level of expertise in a wide variety of geological, hydrogeological, chemical and environmental areas. It would be akin to sending someone equipped with an umbrella into the trenches.	1/26/2021 11:37 AM
85	If they have 'certification' they may be regarded as being 'more qualified' when this is not the case and the more significant contaminant risks may not get the attention required. immobile asbestos in the soil poses very low risk especially when compared to many other contaminants	1/26/2021 11:33 AM
86	Adds layer of confusion about who should be undertaking and leading ground investigation works.	1/26/2021 11:03 AM
87	They are not familiar with other contaminants so sampling may be preferentially targeted on	1/26/2021 10:56 AM

asbestos and not characterize the site as a whole. This questions whether the data is representative and purpose of the SI. Surveyors unfamiliarity may also present additional HSSE risks and concerns as they are not necessarily SQEP to lead the site investigation

88	If it is costly to get accreditation to ISO 17020, I expect that cost would prohibit having both a soil logger and an asbestos qualified person on site.	1/15/2021 10:48 AM
89	There is potentially a risk, although it is more likely that a client would appoint a contaminated land professional. However, the contaminated land professional may be obliged to use an accredited asbestos surveyor as a subconsultant if they did not seek accreditation themselves	1/12/2021 9:32 AM
90	While there will be some asbestos surveyors, especially in joined-up multi-disciplinary teams, who understand the different skills required in building and ground surveys for asbestos, there will always be some that do not. A lack of specific understanding of ground contamination investigation & risk assessment may lead to failure to identify risks or to specify appropriate follow up surveys or remediation.	1/11/2021 5:23 PM
91	the focus of the investigation would be wrong and may even prevent other concerns being investigated and it may be come impossible to undertake the works without complying over the top safe guards.	1/8/2021 6:23 PM
92	Delays, tail wagging dog, tick box exercise!	1/8/2021 12:57 PM
93	Asbestos focused rather than other contaminants. Or in the case of geo-environmental investigations may results in a total failure to obtain the required information.	1/8/2021 12:25 PM

Q3 If accreditation were to be established, who would you choose to supervise a contaminated land intrusive investigation where Made Ground is suspected?

Answered: 115 Skipped: 4



ANSWER CHOICES	RESPONSES	
An asbestos surveyor accredited under ISO 17020:2012	1.74%	2
A contaminated land professional who meets the National Planning Policy Framework definition of a competent person and can demonstrate competency under Land contamination risk management (LCRM)	88.70%	102
Both	9.57%	11
TOTAL		115

#	PLEASE PROVIDE A REASON FOR YOUR ANSWER	DATE
1	Again, if needed then an asbestos specialist risk assessor could be appointed for supplementatry works or assessment	2/16/2021 2:39 PM
2	The Contam land person must lead the ground investigation and have been trained to Cat A and Cat B, and can have an asbestos surveyor to assist either on site or at the end of the phone.	2/16/2021 12:21 PM
3	I feel that the asbestos accreditation is important to ensure representative sample integrity, as mentioned in answer 1, but also that it is essential that a suitably qualified and experienced contaminated land professional is responsible for the direction of works, from a health and safety of site staff perspective as well as to ensure that any land contamination related data and samples are collected and managed appropriately.	2/11/2021 11:00 AM
4	In that case you would need to ensure that the supervisor is competent to cover all elements required.	2/10/2021 1:28 PM
5	As it's likely some clients / regulators would expect the accreditation hen both would have to be employed on investigations to meet their requirements but also to make sure that all the risk are investigated and assessed. This would lead to increased cost and potentially conflicts on scope and procedures while on site.	2/10/2021 7:41 AM
6	To allow for management of the risks as described above	2/9/2021 2:52 PM
7	Supervision of a CL site investigation is multi-faceted; supervisors need to be familiar with identifying and logging multiple types of contamination as well as proficient in HSSE, equipment (drilling rigs etc), purpose of the investigation and dynamic decision making understanding the full SI design data quality objectives.	2/9/2021 2:05 PM
8	Asbestos is soil is one of only a small number of contaminants that may be present and require assessment and following the existing guidance (CAR-SOIL, SCA Blue Book, SoBRA) a competent person under LCRM is more than sufficient to understand and carry out an investigation. Further, a competent land contamination consultant would have a greater awareness of the wider risks and requirements associated with intrusive ground investigation, in particular service avoidance, which a niche specialist in just asbestos would not have. This also includes activities such as non-asbestos soil sampling, soil logging to BS5930, PID screening of soils etc.	2/9/2021 1:49 PM
9	The industry would be forced into seeking accreditation for its staff so as to ensure the quality of their investigations, the safety of their staff and the cost effectiveness to their clients.	2/9/2021 1:30 PM
10	See above. I would not employ an asbestos specialist to undertake contaminated land work.	2/9/2021 12:39 PM
11	With input from the surveyor as necessary	2/9/2021 12:38 PM
12	Asbestos is just one risk out of a whole host of potential contaminants and there is a real danger of missing many many other concerns. Will lead to a skill downgrade.	2/9/2021 12:14 PM
13	As above	2/3/2021 7:52 PM
14	Contaminated Land is wider than Asbestos, which is just a single contaminant amongst hundreds which need to be assessed within a CSM....	2/2/2021 2:26 PM
15	In some circumstances it may be necessary to consult an asbestos specialist, much in the same way as other specialists may need to be consulted as part of a contaminated land investigation (during both design and construction phases). However, a contaminated land intrusive investigation must be led by a competent contaminated land professional.	2/2/2021 11:39 AM
16	An accredited surveyor may or may not be an appropriate addition, dependent on the purpose of teh investigation, nature of the site, and future land use etc.	1/30/2021 1:17 PM
17	For verification processes	1/29/2021 6:24 PM
18	I would say someone with the suitable practical experience and competence for both contaminated land and asbestos occurrence on brownfield site. This may not be covered by the options above.	1/29/2021 4:59 PM
19	Asbestos surveyors are not trained in contaminated land.	1/29/2021 2:36 PM

20	Asbestos sampling is a minor element within the competency required to conduct a CL investigation. The skill areas include: CDM, H&S, Principal Designer and Principal Contractor roles, soil logging, CL desk studies to scope a GI, understanding of different GI techniques including sampling and analysis, monitoring. ACM whilst important is covered by bespoke ACM in soils for non licensed training (as standard building ACM related courses are not relevant - I've sat both types of course). This covers H&S aspects for workers and collection of samples. The interpretation of all Gi results is key as well - not just the fieldwork aspect but understanding why certain soils are sampled and the analysis required to support DQRA for ACMs in soils. This is specialist work and needs to be done by competent people in GI for CL.	1/28/2021 10:57 AM
21	I think my views are established in my previous answers.	1/28/2021 9:55 AM
22	An asbestos surveyor is very unlikely to meet the definition of a competent person and is unlikely to have the necessary qualifications and training to understand the contaminated land process. It is unlikely that they would have the experience or background required to become a member of a professional institution relevant to the contaminated land process (such as the Geological Society, IEMA, SiLC, SoBRA) and be working towards or becoming a chartered professional with these institutions. A competent contaminated land professional will understand all aspects of the investigation. Where the contaminated land professional has identified that there is a risk of encountering significant quantities of asbestos (i.e during the desk study stage or during intrusive works) they may decide that it would be beneficial for an asbestos surveyor to work alongside them. But the asbestos surveyor should not be allowed to take the lead on the majority of contaminated land investigations.	1/28/2021 9:43 AM
23	An asbestos surveyor is qualified to undertake solely one part of the puzzle that is risk assessment of contamination in the ground, they are not qualified to provide risk assessment for any other determinant. They have no background in assessing toxicology, how harmful vapours are etc. That is not to say that with the appropriate training they could - but they are very few and far between in the industry.	1/28/2021 9:02 AM
24	A contaminated land professional has the appropriate experience, training, competency and accreditation to undertake these works and as part of their approach would most likely have appropriate asbestos experience of employ an asbestos professional who does as part of the works.	1/28/2021 8:47 AM
25	There would be no place for an asbestos surveyor in supervision of intrusive investigations. There may be a place for asbestos surveyors who have experience with the ground in assisting site investigations on sites where asbestos contamination is proven and is determined to be a significant risk (e.g. significant fibrous or degraded ACM). We have employed this role in the past. However, not for the vast majority of sites.	1/28/2021 8:09 AM
26	I do not consider that LCRM is a necessary pre-requisite either and knowledge and experience can be demonstrated by other means.	1/27/2021 9:07 PM
27	An asbestos surveyor will typically not have an appropriate degree or be professionally chartered by an appropriate professional institution or have the correct training in contaminated land or geotechnics so they will not have the appropriate skills. It is easier to train a contaminated land specialist to carry out and be accredited as an asbestos building surveyor than visa versa. Asbestos surveyors are also not familiar with the risk assessment process for asbestos in the ground.	1/27/2021 6:37 PM
28	Supported by an asbestos specialist	1/27/2021 5:34 PM
29	As mentioned previously if it were necessary to have an asbestos surveyor on site, it is likely that they would be provide a supporting technical role rather than leading, co-ordinating or supervising a site investigation.	1/27/2021 3:04 PM
30	The Contaminated Land Professional, will assess the site and determine whether a specialist asbestos surveyor will be needed - NOT the other way round.	1/27/2021 2:40 PM
31	See answer to Q1	1/27/2021 1:33 PM
32	Made Ground is source of many contaminants, of which asbestos is one, and from my experience contaminated land professionals already taken into account the risk from asbestos where Made Ground is present, and it would be beneficial to the Client to carry out intrusive investigation that assessed the risk as a whole, and not separated asbestos out from the assessment.	1/27/2021 12:02 PM

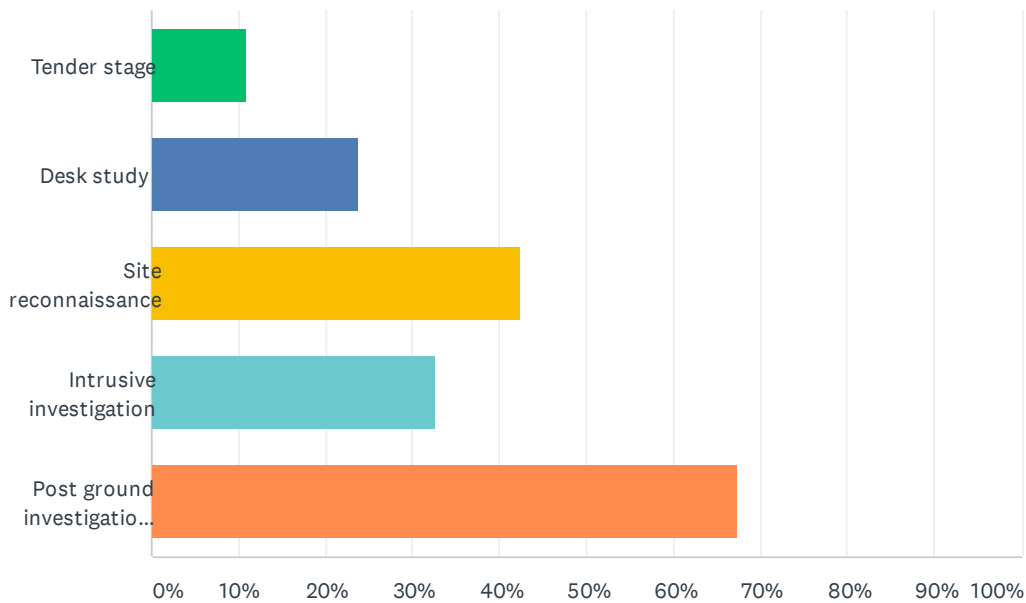
33	In answering as BOTH I have assumed you mean a single person who has both skill sets. When you say BOTH do you mean someone who is accredited in both skills or to have 2 persons on site each with one of the above backgrounds. I spend a great deal of time on projects where a contaminated land professional has not seen the obvious asbestos but rarely see an investigation where a buildings surveyor has done the ground investigation. An active building surveyor will see more asbestos in soil than would a non asbestos trained ground investigation individual simply because they have their 'eye in' particularly regarding the many types of ACMs that could be present.	1/27/2021 11:44 AM
34	Not the right skill set.	1/27/2021 11:43 AM
35	they would be aware of how to investigate, evaluate and undertake appropriate risk assessment covering BOTH asbestos and contaminated land (and geotechnical, UXO, service clearance, planning condition discharge, tender support, cost evaluation etc, etc...).	1/27/2021 11:29 AM
36	You would have to investigate for many contaminants, not just asbestos. Current professionals are capable of assessing land for asbestos already.	1/27/2021 10:58 AM
37	A competent person under NPPF should be quite capable of organising the sampling of some soil for a wide range of contaminant s including asbestos	1/27/2021 10:55 AM
38	see above	1/27/2021 10:54 AM
39	The decision would depend on the main drivers for the investigation.	1/27/2021 10:47 AM
40	Contam land risks from asbestos are merely part of much wider assessment and cannot be considered apart from the conceptual model which is the core of the LCRM process.	1/27/2021 10:19 AM
41	Insurance mitigation for GI industry may require a suitably qualified Asbestos surveyor to advise on the status of the works i.e. licensed/non-licensed; notifiable/non-notifiable	1/27/2021 10:01 AM
42	There would still be a requirement for a contaminated land professional to be present on site, or contaminated land professionals would need to become accredited.	1/27/2021 9:24 AM
43	A contaminated land professional, providing they are appropriately trained and experienced in the management of potentially asbestos contaminated soils and the identification of ACMs, is far more familiar with designing, managing, implementing and interpreting ground investigation data as a whole. Asbestos is often one of a range of contaminants present, all of which require consideration at each of these stages.	1/27/2021 9:13 AM
44	We'd probably find that both would end up being put in specifications, but an ISO requirement is easier for specification authors/checkers etc to understand, so they would be more likely to go for that.	1/27/2021 8:58 AM
45	There is no reason why a contaminated land professional could not become accredited for investigating / surveying soil.	1/26/2021 9:58 PM
46	One understand the ground and one doesn't	1/26/2021 9:48 PM
47	Made Ground in terms of a contaminated land investigation needs to be dealt with my professionals in the field of contaminated land.	1/26/2021 8:54 PM
48	Asbestos assessment of soil needs a god understanding of soil and the complexity of exposure to dist from soil.	1/26/2021 8:19 PM
49	I believe this is most appropriate	1/26/2021 7:04 PM
50	A competent contaminated land professional can demonstrate that they can already appropriately assess for asbestos and don't need a ISO qualification to prove it.	1/26/2021 6:56 PM
51	Years of experience and training, tertiary qualification in an appropriate below ground related subject, specific Health and Safety training associated with ground investigations and an overarching knowledge of the importance of the contaminated land investigation and how it dovetails with the wider site requirements.	1/26/2021 4:30 PM
52	See Q 1 answers	1/26/2021 4:24 PM
53	Neither, these accreditation schemes are pointless and simply serve to drive cost up and quality down.	1/26/2021 4:09 PM
54	client would not pay for 2 supervisors	1/26/2021 4:03 PM

55	You should employ competent trained surveyors, so this could be both	1/26/2021 3:35 PM
56	A contaminated land professional would be best placed to design, supervise and report the findings of an intrusive investigation to ensure that all relevant data is obtained.	1/26/2021 3:35 PM
57	This is an established route for identifying a practitioner with combined skills for investigating potentially contaminated made ground.	1/26/2021 3:33 PM
58	UKAS accreditation demonstrates that their competency has been verified by the sole national accreditation body.	1/26/2021 3:31 PM
59	An asbestos surveyor is not competent to lead an SI. From SSSTS or SMSTS training and to CDM training as principal contractor and generally understanding ground conditions and their stability / chemical risks. I cannot foresee any benefits.	1/26/2021 3:04 PM
60	As previously stated the risk of the contaminated land investigation being carried out incorrectly with the wrong outcome is too great if an unqualified person is supervising the work. If the asbestos surveyor is from a third party company there will also be a question of liability and PI cover	1/26/2021 3:03 PM
61	We have come across some asbestos surveyors who also have good knowledge of contaminated grounds, so as long as the competency is there, it would be beneficial if they had both as we are often dealing with sites with a combination of both buildings and ground, or slabs/footprint of building left behind.	1/26/2021 3:01 PM
62	A contaminated land professional is better versed in the risks relating to excavations (the ground in general) as well as the other contaminants that are likely to be present	1/26/2021 2:40 PM
63	if you undertake a contaminated land intrusive investigation you would want a contaminated land professional to supervise. if you commissioned a painting , who would you get to paint it? the artist or the bloke who sold you the paint?	1/26/2021 2:40 PM
64	Support for a suitability qualified surveyor should be sort once asbestos risk is confirmed - not as a blanket approach on all Made Ground sites	1/26/2021 2:39 PM
65	There is no need for an asbestos surveyor. A competent contaminated land professional will be sufficiently trained to identify and sample made ground and any ACMs present in compliance with the Control of Asbestos Regulations 2012. An asbestos analyst may be required to provide air monitoring on asbestos contaminated sites, but an asbestos surveyor is not required.	1/26/2021 2:30 PM
66	Focus on asbestos may miss the range of other tech issues	1/26/2021 2:27 PM
67	Asbestos in present or at least suspected in all Made Ground, however so are many other contaminants. Asbestos may be present but not a significant driver. CL investigation is more encompassing and it simply doesn't make sense to accredit on a contaminant by contaminant basis.	1/26/2021 2:20 PM
68	A brownfield professional would have the same 'eyes' as an asbestos surveyor, but a considerably more developed eye for contamination and how the risk assessment would subsequently work.	1/26/2021 1:54 PM
69	An asbestos surveyor only assesses asbestos. Brownfield sites need to be assessed by looking at all potential sources, pathways and receptors based on known historical/current uses. This is unlikely to be done in a robust way if only asbestos is considered.	1/26/2021 1:22 PM
70	The Contaminated Land Professional (conversant & with competency of asbestos in CL) has all the tools, guidance to address asbestos risks within ground (or at surface of site). They understand the options available, methods that can be used & are unique to the matrix within which the asbestos is found. CL is very specialised & Asbestos Surveyor is not familiar with CL, they are familiar with asbestos within a building material or fabric. It is very different	1/26/2021 12:22 PM
71	Because they should be chartered and know where the levels of their competence are and what guidance and standards they should be following.	1/26/2021 12:20 PM
72	Contaminated land professionals are all trained in the identification-of and best-practice for how to deal with asbestos in soils / made ground. A building-asbestos surveyor is very unlikely to have an understanding of the ways in which an intrusive land survey is carried out; leading to the potential loss of critical information when designing a remedial strategy	1/26/2021 11:41 AM

73	I believe the contaminated land industry have all necessary experience and training as well as knowledge of contaminated land to be more competent to supervise and execute such task.	1/26/2021 11:38 AM
74	This is the government requirement.	1/26/2021 11:37 AM
75	Contaminated land assessment requires multidisciplinary skills and a level of understanding of geology and chemistry that would not be required to assess asbestos	1/26/2021 11:33 AM
76	CL intrusive investigation need to consider a wide variety of contaminants that may be present of which asbestos is just one. Focus on one CoC will lead to inappropriate treatment of others.	1/26/2021 11:03 AM
77	There are other contaminants of concern in made ground other than just asbestos	1/26/2021 10:56 AM
78	Cost would prohibit both. If ACM found, second round of GI would be appropriate with perhaps both in attendance.	1/15/2021 10:48 AM
79	Competency solely for asbestos does not extend to overarching competency required under NPPF and LCRM	1/14/2021 10:08 PM
80	they will have been trained in the overall process of investigation of contaminated land (including asbestos in soil)	1/12/2021 9:32 AM
81	If there are no buildings on site then a Contam. Land professional will always be first choice. Where there is a mix of potential building and ground contamination, then either party can lead provided the Contam. Land professional has free hand to specify scope of survey and follow-up.	1/11/2021 5:23 PM
82	The Health and Safety Plan can be jointly written and the appropriate working practices agreed. The contaminated land supervisor has to understand the emergency plan and appropriate responses if suspected ACMs are encountered.	1/11/2021 10:49 AM
83	They understand both asbestos issues and contamination issues and make a balanced judgement taking account of both types of risk.	1/8/2021 6:23 PM
84	If forced to use someone accredited under the ISO by say a client's specification or law, then we would have to do so but it would be with reluctance.	1/8/2021 12:57 PM
85	CL professional is the most suitable but it required the GI would have to be supported by an accredited surveyor (with >£)	1/8/2021 12:25 PM

Q4 Do you consider there to be one or more stages in the investigation process at which the use of an asbestos surveyor accredited under ISO 17020:2012 would be best applied. Choose all that you think apply.

Answered: 92 Skipped: 27



ANSWER CHOICES	RESPONSES	
Tender stage	10.87%	10
Desk study	23.91%	22
Site reconnaissance	42.39%	39
Intrusive investigation	32.61%	30
Post ground investigation recommendation where further investigation for asbestos is required	67.39%	62
Total Respondents: 92		

#	PLEASE PROVIDE A REASON FOR YOUR ANSWER	DATE
1	as above	2/16/2021 2:39 PM
2	As long as GI staff are trained to Cat A and Cat B for non-licensed work, they should have all the skills required and an asbestos in buildings surveyor is not required. They can be beneficial for advice.	2/16/2021 12:21 PM
3	Depending on the site, its current use and development history, the likelihood of asbestos being present will vary. As the deployment of an asbestos surveyor will likely have a significant impact on the overall cost of conducting intrusive ground investigation, it would seem prudent for this to be conducted for sites where the potential meets a likelihood threshold, which presumably would be best identified at tender stage if possible, and desk study/site reconnaissance stage where little information is available at tender stage. Then the need for further pre-intrusive investigation reconnaissance including the assignment of an asbestos surveyor could be evaluated on a case-by-case basis, with the surveyor provided with the information gathered by the Contaminated Land professional during the desk study and walkover.	2/11/2021 11:00 AM
4	Debatable if they would be advantageous at any stage, only really if asbestos is identified that requires remediation in accordance with CAR. But even then they would need to be competent to understand asbestos in soil as opposed to building fabrication.	2/10/2021 1:28 PM
5	The input of an asbestos surveyor would be beneficial during the earlier stages of the assessment, they can also be used where a specific concern has been identified on site.	2/10/2021 7:41 AM
6	None	2/9/2021 2:52 PM
7	Asbestos is potentially present in all made ground on brownfield sites (and maybe also greenfield sites like farmland). CL SI using the principals of LCRM will adequate delineate made ground, observe for asbestos fragments during walkovers and SI and sample for appropriate analysis (inc dustiness etc). Recommendations and detailed quantitative levels of RA can then be undertaken using established CL professionals. CL site engineers are trained in the identification of asbestos during the SI. No further surveyor presence is considered necessary as part of this LCRM process.	2/9/2021 2:05 PM
8	More specialist advice may be applicable post a ground investigation when considering options evaluations for remediation where asbestos is the key driving linkage (eg screening and separating fibres in soil during excavation, soil washing to remove fibres etc). However, there would be very little input an accredited surveyor could provide at desk study stage - a good contaminated land consultant already knows how to identify sites with made ground, demolition waste, or industrial pasts which might have asbestos in soils as a contaminant of concern. Site reconnaissance stage is not appropriate given we are looking for fibres in soils and larger ACM fragments will be picked up by consultants anyway. Intrusive GI as noted in earlier answers can be managed through adherence to the existing guidance.	2/9/2021 1:49 PM
9	However, I doubt that an accredited surveyor would come to any different conclusions on the presence of asbestos and potential risks to staff and end users. The vast majority of brownfield sites are going to have has some sort of occupancy and re-occupancy with demolition between prior to the introduction of CAR. Therefore risk assessments rarely use any previous information on asbestos that would be useful to an accredited surveyor (e.g. R&D survey).	2/9/2021 1:30 PM
10	I do not think an accredited asbestos surveyor would be able to provide more useful input than an experienced contaminated land professional at any of the above stages.	2/9/2021 12:39 PM
11	Surveyors are typically trained with regard buildings - we look at asbestos in soils, so only need input as part of wider remediation assessment of needs	2/2/2021 2:26 PM
12	All sites are different and there no specific point at which the use of an asbestos surveyor accredited under ISO 17020:2012 would be best applied - Consulting a surveyor may be necessary at each stage, depending on the project, but most application post investigation where further investigation for asbestos is required.	2/2/2021 11:39 AM
13	Asbestos surveyor accredited under ISO 17020:2012 could be applied to all but in combination with other skills and actually what we need is a competent person under the NPPF and LCRM and NQMS scheme rather than another scheme.	2/1/2021 3:13 PM
14	An accredited surveyor is not "best applied" at the expense of a contaminated land	1/30/2021 1:17 PM

	professional to any of these. But there are circumstances where the project could benefit from input from an accredited surveyor at all these stages	
15	Until the SI has been done you won't know if additional support is needed and in many cases where disperses fibres are present a surveyor is unlikely to add much.	1/29/2021 4:59 PM
16	To support more detailed investigation of a site and risk assessment, if required.	1/29/2021 2:36 PM
17	Inspection of the site surface for ACM would be useful by a specialist at walkover on certain sites.	1/28/2021 5:32 PM
18	NO	1/28/2021 10:57 AM
19	It is useful to have an asbestos surveyor survey the surface of a site for the presence of asbestos prior to intrusive works although this can be undertaken by an appropriately trained contaminated land professional. Where an asbestos survey is being undertaken of the building it would be useful to for them to also survey the curtilage. Where significant quantities of asbestos have been identified or are suspected in soils, then the presence of an asbestos surveyor would be beneficial, particularly during remedial works. For multidisciplinary consultancies this is already undertaken without the need for ISO 17020:2012.	1/28/2021 9:43 AM
20	In my view having an asbestos surveyor present during an intrusive investigation could be useful under certain circumstances - for example where asbestos has been proven to be present by preliminary works and a more detailed assessment is therefore required. However, contaminated land professionals with the appropriate training already given by the industry are better suited for this work still as they can see the bigger picture and undertake the appropriate risk assessment at that time.	1/28/2021 9:02 AM
21	Again, an asbestos surveyor could be included within a land contamination professionals appropriate scope of works as part of the wider intrusive investigation and post investigation remediation, but would not have the broad range of contamination required on brownfield sites.	1/28/2021 8:47 AM
22	I have and will again in the future, employed the services of a specialist asbestos expert with regard to sites, where a significant risk is identified at desk study stage or a significant risk is proven and further investigation and assessment is required. There is no need to use of an asbestos surveyor accredited under ISO 17020:2012 earlier in the process.	1/28/2021 8:09 AM
23	None	1/27/2021 9:07 PM
24	None unless a very high risk site such as an asbestos waste tip is being investigated.	1/27/2021 6:37 PM
25	It may be possible that they are needed at the site investigation stage, although this would be subject to the findings of a desk study and in exceptional circumstances, for example investigation on an asbestos tip.	1/27/2021 3:04 PM
26	The accredited asbestos surveyor would form part of a team led by the land contamination professional.	1/27/2021 2:40 PM
27	Don't see the need for asbestos surveyors in the investigation and assessment of contaminated land.	1/27/2021 1:33 PM
28	An asbestos surveyor accredited under ISO 17020:2012 could be useful to guide and manage a site investigation once asbestos has been identified as a risk, and the further investigation is required to be managed by someone who is likely to have additional experience than a contaminated land professional. Having said that, being accredited does not mean that experience has been gained working with asbestos in soils, and if experience and knowledge is already held by the contaminated land professionals undertaking the initial intrusive investigation then they may well have more experience than the asbestos surveyor with accreditation.	1/27/2021 12:02 PM
29	'Tender' is subjective. Tender is used to describe pricing for a small GI or a large infrastructure scheme. If tender reports are available to be reviewed ideally these should be reviewed by someone who is trained in asbestos (beyond CAT 1 level). At Tender the potential presence of asbestos should always be stated, this doesn't necessarily require surveyor input. At desk study the date of buildings construction, demolition and probable presence of asbestos can all be highlighted without surveyor input. At site recon, intrusive and remediation the particular skills of the surveyor would be beneficial if the contaminated land individuals don't possess the necessary level of skill and experience in asbestos identification and sampling. The latter skill set is rare in younger contaminated land professionals in my experience as it can take many	1/27/2021 11:44 AM

years to put into practice the widely available theoretical information and guidance now available. Many/most consultancies now exclude interpretation of asbestos in the ground from their reporting outputs due to insurance limitations.

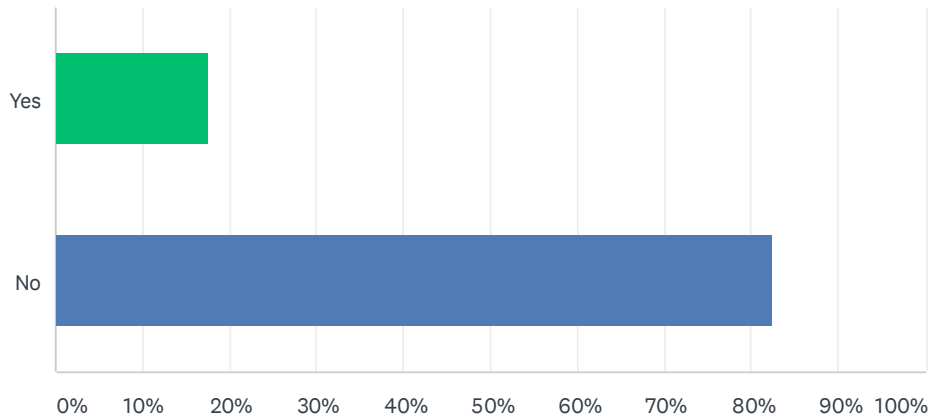
30	To identify where/how that type of asbestos got into the soil	1/27/2021 11:43 AM
31	None. Accreditation under ISO 17020:2012 does not demonstrate competence for site specific risk assessment.	1/27/2021 11:29 AM
32	None.	1/27/2021 10:58 AM
33	A surveyor is qualified to survey something; the accreditation they hold is for surveying, not for anything else - it is however quite possible that an accredited surveyor is also competent at pricing a job but that lies outside their accreditation as a surveyor	1/27/2021 10:55 AM
34	An accredited surveyor should be able to identify those sites at risk of being contaminated with asbestos by virtue of their history and or current status of structures above and/or below ground	1/27/2021 10:54 AM
35	Much like UXO specialist could be used at initial stages and inform requirement for a specialist watching brief at later stages for sites where asbestos is the main risk driver.	1/27/2021 10:47 AM
36	only minor input required if at all.	1/27/2021 10:43 AM
37	The desk study is when the conceptual model is built, for which asbestos surveyors do not have the knowledge or qualifications to do. Their input must be limited to spotting signs of asbestos in the ground and sampling it for laboratory testing and analysis. Assessment of its significance and how to mitigate the risks must be a contaminated land specialist's role. Accreditation will only be of any benefit if the processes to which it applies are appropriate. If not, their involvement at any stage of an investigation would be completely inappropriate.	1/27/2021 10:19 AM
38	Contaminated land professionals already undertake these tasks, with an accredited surveyor probably only required for sampling.	1/27/2021 9:24 AM
39	Potential support to a ground investigation team through visual assessment of materials (remotely)	1/27/2021 9:13 AM
40	I can see a role for someone who is qualified to look for/assess asbestos risk, not necessarily ISO though	1/27/2021 8:58 AM
41	Positively establish the presence of asbestos first.	1/26/2021 9:58 PM
42	Possibly none but certainly only the last potentially	1/26/2021 9:48 PM
43	An asbestos surveyor is most certainly useful at site reconnaissance stage in order to identify potential asbestos sources on buildings and/or structures.	1/26/2021 8:54 PM
44	None of the above. Asbestos assessment for soil has developed significantly since 2012 and is still innovating. Even lab methods are better and further improvements are still in progress. Wrong standard and wrong emphasis.	1/26/2021 8:19 PM
45	None for asbestos in soils	1/26/2021 7:04 PM
46	No need for an ISO accredited surveyor in this field.	1/26/2021 6:56 PM
47	If buildings are on site then an accredited surveyor may be of assistance in assessing risk from buildings etc. I can't see any improvement they would make during the other stages.	1/26/2021 4:30 PM
48	Possibly to assist a contaminated land professional where that professional's knowledge on asbestos is deficient.	1/26/2021 4:24 PM
49	None of the above. Why is asbestos being treated differently to other contamination?	1/26/2021 4:09 PM
50	The procedure and processes can be accredited, the interpretation and opinions related to the survey cannot.	1/26/2021 3:35 PM
51	Contaminated land professionals might seek the advice of an asbestos surveyor where asbestos is identified or suspected to be present.	1/26/2021 3:35 PM
52	asbestos surveyors best understand asbestos in buildings and hence potential sources of asbestos to the ground.	1/26/2021 3:33 PM

53	Asbestos competency is required at all stages.	1/26/2021 3:31 PM
54	None of the above - These people are competent in buildings where CL professionals do not venture. They have no competency in CL investigations / remediation	1/26/2021 3:04 PM
55	None - An asbestos surveyor should not be involved in the investigation at all if they do not meet the requirements of a competent person to LCRM	1/26/2021 3:03 PM
56	All stages of the project could be beneficial depending on the size, complexity, previous history of the site to be remediated. We have had projects where the ground investigations have been carried out to a high standard, but the information has not transferred through to the end users, or they don't understand the report and have ended up exposing before acknowledging what the risk is.	1/26/2021 3:01 PM
57	The site investigation process is controlled in such a manner that if significant and unexpected asbestos finds are encountered then the Si team will stop work and re-assess the ground investigation. this may involve stopping work and getting in the necessary support	1/26/2021 2:40 PM
58	A contaminated land professional is trained to identify asbestos and is aware of the risks. an accredited surveyor can be present present during further investigations of known asbestos impacted soils and to be present during remediation works / removal. similar to the fact that a building surveyor can identify asbestos in a building , who would then bring in a qualified asbestos consultant to undertake a management / pre demo survey for asbestos.	1/26/2021 2:40 PM
59	Assuming no specific risk associated with asbestos is suspected at tender stage	1/26/2021 2:39 PM
60	I see no stages in the investigation process where an asbestos surveyor is required. I can see the requirement for an asbestos analyst to conduct air monitoring and the requirement for a licensed asbestos contractor to be present to provide the necessary control measures during further investigation of asbestos contaminated sites.	1/26/2021 2:30 PM
61	In my experience asbestos surveyors do not understand contam land so not applicable	1/26/2021 2:27 PM
62	If buildings/structures are proposed to be demolished as part of site development an asbestos surveyor would be appropriate to undertake the survey, but not within the ground or within soil stockpiles.	1/26/2021 2:25 PM
63	Perhaps when dealing with licensed work pertaining to asbestos	1/26/2021 2:20 PM
64	If there is asbestos present at surface for example, then more detailed analysis is required for the risk assessment process. There is no reason why an accredited surveyor is required.	1/26/2021 1:54 PM
65	None of the above	1/26/2021 1:42 PM
66	No. Their expertise lies in buildings and associated risks to current users, not risks associated with soil, groundwater and ground gas relating to future users following development.	1/26/2021 1:22 PM
67	If the site has potential asbestos which as been identified during the desk stage / site recon then an Asbestos surveyor would be best applied.	1/26/2021 1:11 PM
68	A specialist contractor would be brought in to deal with any confirmed asbestos.	1/26/2021 12:39 PM
69	Where Asbestos is a key driver or contaminant; I would use a Qualified Asbestos Surveyor for (i) Site reconnaissance - Buildings requiring demolition or refurb. (Type 3 Survey) (ii) Before or During SI to obtain advice on safe method of works or I would use them to do air monitoring (reassurance & testing, evidence) to confirm that safe measures are in place and/or are working (iii) as third party independent Asbestos Safety consultant	1/26/2021 12:22 PM
70	Because I cannot answer no to this question. I see no point at any stage in requiring this, people who are assessing risk should be competent in what they are assessing and if you didn't find a suitable person then you should not be doing anything that would require such accreditation	1/26/2021 12:20 PM
71	Many asbestos building surveys tend to be incomplete and caveated based on whether the surveyor had access to part of the building. Most times the surveyor will say that they believe asbestos COULD be present or that they had no access, resulting in undetected asbestos being left off the survey. Contaminated Land site investigations are very different to building surveys. To approach a site investigation in the same manner as a building survey is carried out could result in a wildly different outcome and recommendations for the site and strategy.	1/26/2021 11:41 AM

72	Asbestos surveying as promoted by the HSL/HSE has unfortunately failed to translate the well-established approaches for asbestos building surveying to the investigation of land and contamination of the soil by asbestos. I served on the CFM working group 3 advising the HSL/HSE on this and am sorry to say that the group really got no further than thinking about the concept of a external ground surface survey. The idea of a depth (i.e. soil) survey was raised but not progressed or discussed in any detail and what subsequently unfortunately appeared in the draft revision to HSG248 reflects a significant lack of understanding about the investigation of land contamination.	1/26/2021 11:37 AM
73	Asbestos is just one of the contaminant risks that needs to be assessed at the early stages of an investigation by a contaminated land specialist and an asbestos accredited 'specialist' would not be required until asbestos has been highlighted as being one of the main contaminants of concern	1/26/2021 11:33 AM
74	An asbestos surveyor accredited to ISO 17010:2012 should be utilised to survey buildings and structures prior to demolition or where specialists advice on asbestos presence on the surface of a site that cannot be dealt with via conventional contaminated land procedures.	1/26/2021 11:03 AM
75	where their opinion can feed into possible remedial actions	1/26/2021 10:56 AM
76	Early stage involvement would be limited value, ACM crops up everywhere. Real value is only achieved by having a trained eye when items crop up.	1/15/2021 10:48 AM
77	Potentially, the last category, if specialist advice was required for further investigation or mitigation controls	1/12/2021 9:32 AM
78	Selected stages would need to be considered for all sites, but where there are no buildings/structures present then role should be managed by a Contam. Land professional.	1/11/2021 5:23 PM
79	Where a site is known to have ACM present then an asbestos professional should be involved throughout.	1/11/2021 10:49 AM
80	a knowledge of asbestos sources which may contribute to asbestos in soils may be useful.	1/8/2021 6:23 PM
81	A desk study to assess the risk could be useful, similar to the red, amber, green assessments which Zetica provide for unexploded ordnance. However, anything beyond this should be undertaken by a competent professional.	1/8/2021 2:17 PM
82	Not required at any point in a contaminated land investigation if carried out by experience and trained CL professionals.	1/8/2021 12:57 PM

Q5 If UKAS implement accreditation for 'ISO 17020:2012 for the surveying of contaminated land for the presence of asbestos' do you consider this will benefit contaminated land site investigations?

Answered: 119 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	17.65%	21
No	82.35%	98
TOTAL		119

#	PLEASE PROVIDE A REASON FOR YOUR ANSWER	DATE
1	in the event that specific services requiring asbestos-specialists may be required these can be specified the GI/SI designer already, if an asbestos-specific survey is required then there is no argument with that and it may be that a multi-disciplinary company can provide in-house expertise or a specialist sub-contracted , however the requirement for this can be determined by a competent contaminated land practitioner, and i'd only envisage ti to be needed on a very small number of sites.	2/16/2021 2:39 PM
2	The big problem is that asbestos training is being given by asbestos in buildings people. To be an asbestos trainer requires someone to be qualified in building surveys. This should not be the case. There should be a recognised qualification relevant to asbestos in soils surveys.	2/16/2021 12:21 PM
3	Asbestos in made ground is a relatively common occurrence but one that can be easily missed or poorly represented in sampling and logging - a clear demonstration of competency for surveying would provide reassurance that the characterisation of asbestos has been done with competence.	2/11/2021 11:00 AM
4	Its adding an accreditation which is currently not suitable for its intended use, it increases the requirement for additional unnecessary training and potentially additional personnel onsite increasing the risks.	2/10/2021 1:28 PM
5	In it's current form there is no benefit to investigating contaminated land.	2/10/2021 7:41 AM
6	Contaminated land is a multifaceted, complex subject which doesn't solely focus on asbestos. Will add increased cost with little benefit	2/9/2021 2:52 PM
7	As above. The LCRM process is considered appropriate for CL SIs. Implementation of further accredited supervisors may result in unqualified supervisors for the rest of the CL contaminants of concern.	2/9/2021 2:05 PM
8	Implementation in its current form is only likely to burden investigations with unnecessary time and cost to have additional staff onsite carrying out works which can be undertaken by existing competent consultants following existing guidance. It is more liekly to lead to work continuing to be undertaken without the ISO accreditation and consultants caveating accordingly.	2/9/2021 1:49 PM
9	It is hard to see what additional benefit would be gained by using such an accreditation scheme.	2/9/2021 12:39 PM
10	We are already adhering to best industry practice for work specifically to soils.	2/9/2021 12:38 PM
11	Doesn't consider how guidance has evolved beyond the proposed scope, such as work by SoBRA. Asbestos in soils is a more complicated issue than asbestos within building fabric.	2/9/2021 12:14 PM
12	It clearly will not work, do asbestos surveyors really want to be asked to look at one strand of a contaminated land assessment and make that into another assessment on its own? i highly doubt it.	2/8/2021 4:32 PM
13	The costs of site investigation would go up with no real benefits for developers. At the risk of being too blunt - this appears to be a money making scheme for UKAS.	2/3/2021 7:52 PM
14	It will stall the industry as we are already well accredited for a wider range understanding of CSMs	2/2/2021 2:26 PM
15	The industry has completed a lot of work in recent years regarding asbestos in soils and it is not clear what added benefit this accreditation could provide. Whereas, it is likely that such an accreditation would be detrimental to contaminated land intrusive investigations and not compliant with other guidance and legislation if it leads to accredited asbestos surveyors leading a contaminated land investigations, if they do not have the necessary skills, knowledge and experience in contaminated land investigations to demonstrate competence.	2/2/2021 11:39 AM
16	Staff need to be competent in a whole range of contamination and site risks - accreditation for contaminated land investigations should encompass all these things not just ISO 17020.	2/1/2021 3:13 PM
17	Added competent verification	1/29/2021 6:24 PM
18	As with many areas the contaminated land industry, certain groups try to put in place controls such that the number of people who are able to assess and mange contaminated land are limited to those people in those groups. As with many parts of the industry accreditations provide only a degree of assurance as to the real knowledge and experience and people	1/29/2021 4:59 PM

actually undertaking the work. Any such schemes need to be accessible and inexpensive such that the ability to undertake work doesn't become limited to those involved.

19	As above.	1/29/2021 2:36 PM
20	Because it would provide an additional piece of information. Whilst experience contaminated land practitioners should identify potential asbestos products it is one of many items they are potentially considering. If this could be a distinct point of inspection that could be of value. But it should not replace the contaminated land inspection (it should compliment it)	1/28/2021 5:32 PM
21	It would be a backward step as the H&S and quality aspects are already being managed by the majority of the industry. It would be a more sensible approach to require site staff to have ACM in soils for non licensed work training.	1/28/2021 10:57 AM
22	There is a danger that asbestos will become the focus of investigations and that the CSM as a whole will not be adequately addressed. There is a role for asbestos surveyors to support contaminated land professionals but an additional accreditation for this is not required as asbestos surveyors can already be asked to assist in investigations.	1/28/2021 9:43 AM
23	In my view, it brings an influx of companies into the contaminated land industry who are incompetent at assessing contaminants outside of asbestos. I would be honest in saying I am not sure they would even be competent at assessing asbestos in the soil as it is very different from building surveys.	1/28/2021 9:02 AM
24	You run the risk of people solely using an asbestos surveyor for a site which would have much more complex contamination concerns than solely asbestos of which the asbestos surveyor would not have appropriate accreditation, experience or training to manage.	1/28/2021 8:47 AM
25	The reasons are summarised above.	1/28/2021 8:09 AM
26	Will cause further divide between UKAS and contam land industry.	1/27/2021 9:07 PM
27	It will be to the detriment of the contaminated land part of an overall brownfield land assessment for the reasons above. It should be noted that brownfield land assessment is more than contaminated land and often the geotechnics are a bigger risk than contaminated land or asbestos. Will an asbestos surveyor also be trained in these additional issues? Note that to sign off a report to the requirements of NPPF you also need to be competent in other ground related issues in addition to contaminated land such as mining risk. How many Asbestos Building Surveyors have appropriate degrees to have the basic knowledge to be trained in contaminated land, very few in my 35 years of experience.	1/27/2021 6:37 PM
28	As long as asbestos specialists are cognisant of their limitations.	1/27/2021 5:34 PM
29	Only in exceptional circumstances	1/27/2021 3:04 PM
30	Yes provided the SiLC, SQP, NPPF defined competent person leads the process.	1/27/2021 2:40 PM
31	It will provide yet further confusion regarding who is a competent person in relation to LCRM.	1/27/2021 1:33 PM
32	It will split contaminated land investigation when I believe it is better to assess the risk from all contaminants together.	1/27/2021 12:02 PM
33	Only when in support of other appropriately qualified and experienced contaminated . A contaminated land professional also with the ISO 17020.2012 qualifications would be even better and was quite common (or its equivalent) within Geoenvironmental consultancies in the 2000's. However, both professions rely on training, competence/diligence and experience so focusing on black and white qualified/not qualified thinking is not necessarily going to resolve the issue amicably (in my opinion). The issue can perhaps be equated to the ongoing and progressively worse issue of contaminated land professionals undertaking geotechnical works and geotechnical specialists and engineers undertaking contaminated land works where neither is competent in the other discipline. This problem already exists in our industry and can have similar magnitudes of technical, financial and safety implications. Perhaps lessons learnt from this situation can be used to demonstrate to UKAS why we are so concerned?	1/27/2021 11:44 AM
34	Wrong skill set	1/27/2021 11:43 AM
35	No. All UKAS means is that when you are accredited that you follow the stated procedure (which may or may not be the right one) and that all equipment is calibrated (which may or may not be the right equipment for that situation) and that staff are trained (which may or may not be the right procedure for that specific activity that's actually needed, for the specific situation	1/27/2021 11:29 AM

or site). It does not, and cannot cover interpretation, and surely contaminated land investigation is as much about interpretation as it is on procedure. Think on Grenfell, the tests undertaken were accredited, but they were the wrong tests on the wrong materials. Why would this be any different? The proposal sounds like a marketing tool for the asbestos industry that will result in driving down the quality of GIs, increasing risk to individuals undertaking the work and increasing overall costs to clients.

36	Uptake will be low. Adds an unnecessary tier and expense to SI.	1/27/2021 10:58 AM
37	I do not follow that asbestos is any different to other contaminants and consequently requires special consideration over and above any other.	1/27/2021 10:55 AM
38	see above	1/27/2021 10:54 AM
39	as stated above may add benefit for sites where asbestos is the primary driver for the investigation	1/27/2021 10:47 AM
40	The ground cannot be specified so conformity assessment in terms of investigating it is inappropriate. Investigation is an exploratory process, not an inspection process, and is already covered by existing standards developed for exploratory processes. Laboratory testing can and is be covered by conformity standards. Certification can be applied to wrong standards so even if an organization has certification, if the standards they are certified to are wrong, the inspection will not give the correct outcome. This will be highly misleading to clients and al stakeholders.	1/27/2021 10:19 AM
41	Depends on level of thought given to overlap of the disciplines.	1/27/2021 10:01 AM
42	Expierenced contaminated and professionals already have greater experience of what to look for in relation to asbestos in soils rather than a surveyor with a background in building surveys.	1/27/2021 9:24 AM
43	Will add cost by requiring asbestos surveyor and contaminated land professional and/or introduce knowledge gaps in regard to the wider investigation process	1/27/2021 9:13 AM
44	As stated above, suitable qualifications and training expectations already exists. The CL industry does not need another niche qualification	1/27/2021 8:58 AM
45	Establish clearer guidance on techniques and frequency of sampling for this difficult to assess, discrete soil contaminant.	1/26/2021 9:58 PM
46	Please see all previous answers which justifies this answer.	1/26/2021 8:54 PM
47	It will overemphasise one issue lead to inappropriate investigation, move away from a risk based approach considering exposure and contam land aproaches, over remediation for asbestos without looking at other issues. Itbmay also syifke development. And not necessarily compliant with Part 2A CLR11 (Or latest equivalent). Bettr to focus on developing the assessment and sampling methods.	1/26/2021 8:19 PM
48	See above	1/26/2021 7:04 PM
49	Asbestos in soil assessment surveying needs are already clearly identified in pre-existing guidance. No need to duplicate it and cause unnecessary burden to competent professionals.	1/26/2021 6:56 PM
50	Our staff are now very well trained on the identification of ACMs on surface and within soils. I see no benefit to having a separate accreditation where building asbestos surveyors may suddenly become involved with ground investigations where Asbestos is one of a number of contaminants being investigated within both the soil and groundwater. It could seriously devalue the overall human health and groundwater risk investigation and interpretation process.	1/26/2021 4:30 PM
51	See Q 1 answers	1/26/2021 4:24 PM
52	This industry is a wash with pointless accreditation's already.	1/26/2021 4:09 PM
53	Contaminated land is already a confusing mix of chemists, geologists, engineers, biologists, geographers etc adding another one to the mix would not be helpful - especially one with a background in building surveying - we cant even get decent, basic SI reports from some SI providers never mind confusing them looking at asbestos	1/26/2021 4:03 PM
54	But only as part of a holistic approach. It must be made absolutely clear what the accreditation covers, and more importantly what it does not.	1/26/2021 3:35 PM
55	Asbestos surveyors would not have an adequate broad understanding in the assessment of	1/26/2021 3:35 PM

	potential contamination at brownfield sites.	
56	contaminated land investigations require experienced staff who understand a wide range of interconnected issues. This is well covered by various British Standards and technical guidance which also includes legislation and guidance dedicated to asbestos. There is no need for an additional isolated accreditation which will lack other elements of contaminated land site investigation skills.	1/26/2021 3:33 PM
57	It will enable clients to select competent externally verified firms.	1/26/2021 3:31 PM
58	None of the above - These people are competent in buildings where CL professionals do not venture. They have no competency in CL investigations / remediation. This would create an unsafe act or condition.	1/26/2021 3:04 PM
59	Reasons stated above	1/26/2021 3:03 PM
60	We need the knowledge of surveying asbestos and how to recognise the characteristics of asbestos when in the ground as they look a lot different when disturbed in the ground, but having the visual eye for materials will help greatly when trying to decide physical form or not.	1/26/2021 3:01 PM
61	it will add an necessary and disproportionate level of work and administration to a standard site investigation of a site that has not got a significant risk from asbestos. Sites where there is a very high level of risk of encountering significantly high levels of asbestos such as asbestos products manufacturing facilities or uses where a lot of asbestos was used / deposited (ie an asbestos products landfill) would requires the appointment of an asbestos surveyor to oversee the works.	1/26/2021 2:40 PM
62	1) All field staff would have to become UKAS accredited with significant cost and time implications 2) Alternatively another accredited party would have to be in attendance when we break made ground – again with cost implications 3) Essentially, asbestos surveyors (conversant with building surveys relating to management, refurbishment or demolition) could be undertaking the work of a contaminated land professional - without the relevant training, experience, competency or accreditation for investigating potentially contaminated land.	1/26/2021 2:40 PM
63	Overall no if surveyors are required to be present whenever MG is investigated but yes if targetted use of specilaists when required.	1/26/2021 2:39 PM
64	An ISO 17020:2012 accredited asbestos surveyor would not have the relevant training, experience and competence for investigating potentially contaminated land. I can envisage the situation where investigations undertaken by an asbestos surveyor will have to be repeated by a contaminated land professional, because they have not been undertaken properly.	1/26/2021 2:30 PM
65	As above	1/26/2021 2:27 PM
66	It will hinder the site investigation into the ground and make GIs too expensive, which will ultimately deter brownfield development. The standard for asbestos building surveys already exists and incorporating soils into this offers no benefit.	1/26/2021 2:25 PM
67	This seems counter intuitive and will be of little benefit. If this is the case then will we end up with accreditation for TOH sites, VOC sites?!	1/26/2021 2:20 PM
68	UKAS is a money making organisation that accredits fixed processes and methodologies. Such accreditation is not adding anything meaningful. The Broiwnfield professional should be equally (if not more) competent to look for asbestos in contaminated soil.	1/26/2021 1:54 PM
69	There could be a benefit on some sites as a specialist to assist in the risk assessment process but not as a lead role.	1/26/2021 1:52 PM
70	This could provide an added layer of complication with little to no benefit for clients.	1/26/2021 1:42 PM
71	More competition, clients will go for the cheapest option so rates may fall even lower, limited assessment that only relates to asbestos likely.	1/26/2021 1:22 PM
72	Most contaminated land people have ACM awareness and can identify Asbestos.	1/26/2021 1:11 PM
73	But only as a means to identify a suitable Asbestos Surveyor for CL projects where specialist advice is needed on scheme. I have used Specialist asbestos consultants in past, some get 'contaminated land', but others cannot deviate their approach away from set practices that have been developed for Building fabric projects.	1/26/2021 12:22 PM

74	Pointless duplication, people have been trying since CAR 2012 to try and shoe-horn the very good in-buildings protocols into contaminated land settings with no joy, if we did have a framework then yes, possibly some form of accreditation would be possible, but as it is, there is nothing to assess against for land in the UK	1/26/2021 12:20 PM
75	This will add more costs and confusion to an area of industry that does not require it. Asbestos Identification and Quantification is already something that takes on all contaminated land projects; from desk study through to full remediation works. Asbestos is already something that the remediation industry is proficient at dealing with and actively looks for on a site, however, Intrusive Land Surveys are not something that Building Surveyors are familiar with and the site investigation findings involve, most of the time, a much larger picture than simply looking for asbestos.	1/26/2021 11:41 AM
76	see above	1/26/2021 11:38 AM
77	I can foresee that it will be akin to charge of the light brigade. Something that should not be regretted only in hindsight...	1/26/2021 11:37 AM
78	training upcoming contaminated land specialists to identify potential asbestos contamination and ensure that it is adequately tested is a far better way to advance the industry. Accreditation for asbestos would be no more valuable than accreditation to identify TPH, PAH, VOCs or metallic contaminants etc.	1/26/2021 11:33 AM
79	No, skill set of limited relevance to asbestos in soils. Does not require an understanding of ground investigation approaches, human health risk assessment or UK contaminated land regime. As an industry we have areas we can improve but the majority of the time they don't relate to identification of asbestos or quantification of it in soils. Work is required on compliance with CAR2012/Car-Soils in the GI process.	1/26/2021 11:03 AM
80	Industry is strongly against this so it will not to adhered to and will provide disparity in site investigations	1/26/2021 10:56 AM
81	Likely to lead to investigations being driven by an accredited surveyor and not by a contaminated land professional	1/26/2021 10:53 AM
82	There is always the potential for it to raise standards if implemented properly	1/14/2021 10:08 PM
83	Competent contaminated land professionals should be capable of surveying asbestos in soils without the need for another piece of paper needed if accreditation was implemented	1/12/2021 9:32 AM
84	As with other forms of UKAS accreditation, it is an option for Clients to choose, in order to improve the credibility and reliability of the survey work they commission. It does not preclude asbestos surveyors from being involved in land contamination (which may in some cases be appropriate), but allows for Clients to be better informed about options and outcomes. The pilot programme should therefore give careful consideration to how practitioners are defined.	1/11/2021 5:23 PM
85	The identification of ACM falls between too many professions at the moment so a combined approach will deliver a safer working environment for our site staff.	1/11/2021 10:49 AM
86	It will prolong, extend and increase costs of ground investigation, and maybe reduce the overall effectiveness of the investigation	1/8/2021 6:23 PM
87	For the reasons stated above.	1/8/2021 12:57 PM
88	As a company we only utilised staff who have the IIT required for the role. Where IIT is insufficient a specialist is employed e.g. licensed works. In these instances the requirement of CAR 2012 will 'overrule' those of the ISO standard.	1/8/2021 12:25 PM