

EUROPEAN ECONOMIC AREA  
STANDING COMMITTEE  
OF THE EFTA STATES

4/HS/W/014  
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Brussels

WORKING GROUP ON HEALTH AND SAFETY AT WORK AND  
LABOUR LAW

**Comments by the EEA EFTA States to the proposal for a Directive  
amending Council Directive 83/477/EEC on the protection of workers  
from the risks related to exposure to asbestos at work<sup>1</sup>**

**I INTRODUCTION**

1. The EEA EFTA States have studied the proposal for a Directive amending Council Directive 83/477/EEC on the protection of workers from the risks related to asbestos at work and would like to provide two comments regarding the proposed provisions on **fibre counting** and **training of workers**:

**II FIBRE COUNTING**

2. Reference is made to the proposed *new article 7, paragraph 6*, which states that fibre counting shall be carried out wherever possible by PCM (phase contrast microscope) in accordance with the 1997 WHO (World Health Organisation) recommended method.

3. In order to ensure the most reliable method when counting fibres, the EEA EFTA States would like to provide the following comment to the proposal mentioned above:

If fibre counting has to be carried out in a working environment where a mixture of inorganic fibres are suspected to be present, **electron microscopy could be used, e.g., VDI guideline 3492 (scanning electron microscopy) or ISO 10312 (transmission electron microscopy)**.

4. Phase contrast microscope is less effective than electron microscopy when it comes to distinguishing between inorganic fibres with a mixed chemical composition.

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<sup>1</sup> COM (2001) 417 final

Electron microscopy distinguishes between asbestos and other fibres, and can demonstrate thinner fibres than phase contrast microscope.

### III TRAINING OF WORKERS

5. Reference is made to the proposed *new article 12a*, which concerns appropriate training for all workers who are exposed to, or are liable to be exposed to asbestos containing dust.

6. The EEA EFTA States would like to provide the following comment:

It is important that training for workers who are exposed to, or liable to be exposed to asbestos containing dust also includes **practical training**.

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