

*Minister Jan Jambon  
Vice-Premier ministre et ministre de la  
Sécurité et de l'Intérieur, chargé de la  
Régie des bâtiments*

*copy:  
Commissioner Oettinger  
Commissioner for Budget and Human  
Resources*

*M. Giancarlo Marcheggiano  
Secrétaire Général des Ecoles  
Européennes*

*Brussels, 23 October 2018*

**Object: *European Schools in Brussels – Temporary Site in Avenue des Art, 30***

*Dear Minister Jambon,*

*We are writing to you on behalf of the Parents Associations of the European schools of Uccle, Woluwe and Ixelles (APEEEs).*

*The APEEEs represent the parents and the voice of more than 12000 children aged 4-18 years who attend nursery, primary or secondary school education in 4 different schools and one temporary site site in Berkendael and in several language sections.*

*Before summer, we have been informed that the Belgian Federal Government has proposed to offer the building known as "Arts-Loi" (in Avenue des Arts, 30) as a temporary school premises for final year students, to address the overcrowding situation in Brussels European schools.*

*Whilst we welcome steps taken to address the issue of overcrowding, **the APEEEs wish to express a number of serious concerns regarding key aspects of the proposal of a temporary site in "Arts-Loi", as listed below.***

*We believe that if these issues are not adequately addressed, the result will be significant harm to the education of pupils as well as damage their general wellbeing as neither the location nor the building cater for school activities.*

*Unless and until parents can be reassured that any solution will address these concerns, they will not support such a project and will oppose any move to relocate pupils to a new school site at Arts-Loi.*

*We understand that not all of the questions raised below can be addressed by yourselves, but nevertheless as they all pertain to the location, facilities and organisation of a potential new school site they are relevant to any potential solution that is proposed.*

***What are the plans for ensuring there is sufficient infrastructure in place to support 800 or more pupils?***

*Any temporary site will be a school of significant size and will therefore need the normal range of fixed infrastructure; yet the premises, which is currently an office building, is not designed to cater for this number of people. What will be done therefore to ensure it is fit for purpose as a school, and has adequate canteen facilities, preau areas, educational support facilities, WCs, public spaces, libraries management offices, security facilities?*

*The current proposal foresees, to our best knowledge, only the provision of science labs. However, for a normal education, the building must provide facilities for other curricular activities, such as sports, arts and music. Adequate space should be ensured also for those activities that are essential to a comprehensive school life, such as orchestras, choirs, school concerts, arts shows and multiple others. Nowadays, many pupils participate in such activities arranged on the school sites. If there are no facilities how will these essential parts of school life and school curriculum be delivered at the Arts-Loi premises?*

*The “Arts-Loi” site has very limited space. There is no outdoor recreational space except for two small quadrangles. There are no green areas or other spaces that the students can use in the immediate vicinity without crossing major roads. Pupils have free time for breaks and lunch which they will be obliged to spend outside the school premises in the highly polluted and congested Arts-Loi junction area. Lack of available break time space is not compatible with normal school life.*

***What are the plans to avoid deteriorating the situation of an already very congested area?***

*It will not be possible to operate a bus service to the Arts-Loi premises therefore pupils will be asked to take public transport. Many families do not live close to metro stations, and rely on the school buses. Although in these circumstances the school bus service will be able to bring the pupils to the metro, pupils will be faced with further 30-40 minute journey to get to “Arts-Loi”. A 1-1.5 hour commute to school is an excessive burden to place on pupils, especially in their final years when they need more time for studying.*

*In the afternoon, no bus transportation can be possibly foreseen. Many parents will need to collect or drop off pupils at the school, especially if this is the only alternative to lengthy*

*journeys on public transport. How will this be possible as there are no facilities for this at the location and evidently parents arriving and leaving will cause very significant traffic jams for themselves and all other road users in this area - which as we are all aware is already one of the key arterial nodes of Brussels and highly congested.*

***How will pupils be protected against the polluted environment of the Arts Loi area?***

*In 2017 Client Earth sampled air quality around Arts Loi, Rue de La Loi and at the nearby American embassy building and concluded "These are shocking levels of air pollution. By hiding the real state of the air in the capital, the Brussels government is exposing all of us to unacceptable health risks". NO2 levels were found to be almost 2.5 times the legal maximum at the US Embassy, 2.3 times on Rue de La Loi and 1.8 times at Arts Loi itself. High pollution levels are associated with significant health damage and impact on intelligence. A high pollution environment is not an appropriate site for a school. We note that in Antwerp schools may not be built or extended in areas where pollution levels exceed 42 microgram per cubic meter and where the noise is more than 70 decibels. Why are these standards not being applied when it comes to a new European School site?*

***Have the responsible authorities taken into consideration the harm to the provision of the core education?***

*Unlike a new school, this temporary site could only be used for highest of secondary classes, because of the need for pupils to take public transport. The plan assumes that teachers can be made available to teach the final year pupils at Arts-Loi. But the reality is many of these teachers also have continuing teaching obligations for other school years in the existing school sites.*

*They will therefore need to spend a lot of their time travelling between two sites, which means a significant reduction in the number of teaching hours they can deliver. There are no plans to ask member states to send more teachers, and in many cases this would anyhow not be viable. The consequence therefore can only be a reduction in subject choices and in number of lessons pupils receive. This can only degrade educational quality for all pupils, with a particular risk for pupils preparing for their final exams - which will determine their university admissions.*

*The impact on teachers and students will not stop there. The new site will offer reduced space for important informal meetings of teachers. Schedules and hours of teachers and pupils are bound to get worse. Moreover, there will be a significant negative impact on out-of-school student activities and projects based on collaboration among S4-S7 students. S6-S7 students will lose any ties with their school environment of origin (e.g. impossible to follow annual school events, loss of communication and interaction with their school community of origin, etc.)*

*It is worth noting that the Office of the Secretary General previously analysed the option of setting up a secondary campus for the senior year students in Brussels schools, but concluded it was not feasible because the timetable could not work so that the necessary number of teaching hours were delivered. And that was without factoring in teachers being spread across two sites.*

***What other options are being considered?***

*Why are sites much closer to the existing schools, in less congested, less polluted areas not considered which would avoid many of the above problems? In particular why is a quick-build school premises (using modular building techniques) not being considered as the starter of the 5th school on the already vacant NATO site? This is a more convenient location that can be served by school buses and has the space for a full complement of buildings to ensure a normal school environment. It could therefore be used for new pupils arriving in the school system, rather than forcing existing pupils to move and could potentially be delivered in as short a time frame as converting the Arts-Loi premises. In the long term, this solution can also contribute significantly to the successful launch of the fifth school, which we understand is likely to be created in the NATO site.*

*Minister Jambon, we firmly believe that any proposed solution should duly address the above mentioned aspects in order to be considered viable. Furthermore, the undersigned parents' Associations - as main stakeholders in this process - request to be formally consulted in the decision-making process for a temporary or new school site before any deliberation is completed. We would be also very grateful for the opportunity for a meeting to present to you or one of your representatives our concerns.*

*Yours sincerely,*

*Kathryn Máthé (President, EEBI APEEE)*

*Francesca Tudini (President, EEBII APEEE)*

*Anastassios Papadopoulos (President, EEBIII APEEE)*