

Ministry of Health, Labour and Welfare

Public Hearings on a New Regulation Regarding the Use of Chrysotile Asbestos Tokyo, Japan, April 8, 2003

Executive Summary

No one in the chrysotile industry denies that this product, similar to hundreds of others used daily, can present a health risk if misused. Based on over a century of experience in the commercial exploitation of chrysotile, we strongly urged and assisted industry, trade unions and governments to adopt the principle of the safe and controlled-use in order to protect workers and the general public, while continuing to use this high quality mineral which has multiple properties that cannot be imitated by any one alternative fibre, either man-made or mineral.

Today's chrysotile products are different from those manufactured and used 25 years ago. Everyone should always keep in mind a few extremely important factors when looking at alarming data regarding people suffering from asbestos-related diseases:

- 1) There is a long latency period, 20 to 40 years, from high exposure to asbestos and the development of pulmonary diseases. Problems we encounter today are the results of a situation that no longer exists;
- 2) At moderate or low exposure, problems are inherited from the use of amphiboles. These fibres are no longer in use.
- 3) To estimate the number of victims in future years (especially using the Peto or the EPA models) always leads to a large exaggeration, mainly because these models are based on heavy exposure to amphiboles and don't take into account the progress made in terms of industrial hygiene in the last 20 to 25 years.

Supported by a large consensus among scientists, we would like to state that any alarmist reports about the numbers of mesothelioma cases, present or future **has no relation with present, past or future exposure to chrysotile**. We are in agreement with the Japanese legislation, which as already banned use of amphiboles, but for this reason and others we will describe further on, chrysotile should not be added to the prohibition list.

Over the last couple of decades, the international chrysotile industry has implemented the safety measures embodied in the International Labour Organization (ILO) Convention 162 and in the ILO Code of Practice on asbestos throughout the lifecycle of

this fibre. We are proud of our accomplishments, as we believe this industry can serve as example for many others concerned with occupational health and safety.

The majority of international experts, both opponents and advocates of safe chrysotile use, recognize that these controls exist and that when they are implemented, they provide adequate protection to workers in the mining and manufacturing sectors. The principle of controlled-use was not created by the chrysotile industry and does not apply to this industry alone. This is a general principle of risk management recommended for all products or technologies that may present a risk to health, in the absence of appropriate controls and guidelines.

Replacing chrysotile is a very complex operation. The risks and dangers with many other fibres are sufficiently clear now that legislators are starting to impose regulatory constraints on these substitutes. The regulatory authorities are welcome to apply the standards for chrysotile to all industrial fibres if they truly want to protect the health and safety of workers.

Since the main argument used to substitute chrysotile is based on the premise that its uses present an unacceptable health risk, it is essential to ensure that the replacement products are harmless or less harmful. For most of these substitute fibres and products, this is not the case.

Because the use of substitute fibres to asbestos is relatively recent, no epidemiology studies can presently evaluate their human health effects. Today, it has become abundantly clear that "biopersistence" is the key parameter to take into account when comparing the toxicity of respirable fibres.

Results of an ongoing study by three laboratories in Switzerland, Germany and in the U.S.A. demonstrate the **half-time clearance** for Canadian commercial chrysotile, i.e. the number of days necessary to eliminate half of the fibres remaining in the lungs after end of exposure, is about **15 days**. This fibre is therefore less durable, according to recent studies using the same methodology, than its major replacement industrial fibre. For instance, **ceramic fibre (RCF 1)** has a half-time clearance of **60 days**, **aramid fibre** around **90 days** and **cellulose fibre** over **1000 days**.

In addition to the health issue, resistance, durability and cost-effectiveness of the chrysotile-cement products support the continuation of its use. In the case of Japan, the environmental friendly products are manufactured locally under perfectly safe conditions, perfectly adapted for the climate and the environment.

We know chrysotile asbestos can be controlled effectively and when this is done, health risks are undetectable. It is not completely wrong to believe that bans can be, in most cases, an escape route that is both dangerous and irresponsible. Banning all uses without regard to the context of use in favour of untested substitute substances leads us to a dead end. It can also easily create a false sense of security. It is not true that simply banning products automatically guarantees safety. It is a serious and major error

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to view things in this manner, especially knowing that chrysotile appears to be among the least hazardous industrial fibre used nowadays.

Canada is highly interested by the regulatory changes in Japan. As one of the world's largest exporters of chrysotile, and promoter of the safe-use principle for minerals and metals, Canadian industry, trade unions and governments are concerned that any decision Japan may take may be contrary to this principle.