





June 12, 2017

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Dear Minister McKenna, Minister Philpott and Minister Duncan:

Re: Response to Consultation on the proposed regulatory approach to prohibit asbestos and products containing asbestos (supporting organizations and individuals - updated June 12, 2017)

As a follow-up to our submission dated June 4 2017, we, the undersigned organizations and individuals, submit the following comments and recommendations in support of Canada's commitment to achieve a ban on asbestos in Canada.

An initial letter emphasizing the need for regulatory measures to ban asbestos, and establish an expert review panel on asbestos, was addressed to Prime Minister Trudeau dated December 6, 2016 with the support of over 100 groups and individuals.¹ The government's announcement for a ban on asbestos made on December 15, 2016 received a warm welcome from across the country.² Based on the government's announcement of an asbestos ban, many groups in Canada followed up with initial comments and recommendations in response to the Notice of Intent to develop regulations respecting asbestos dated January 17, 2017.³ We maintain that the recommendations made in our initial submission remain relevant for adoption in Canada's asbestos management strategy.

On April 21, 2017, in preparation for the negotiations of the Conference of the Parties under the Rotterdam Convention on Prior Informed Consent, we were pleased that the Federal ministers responsible for asbestos management reiterated Canada's commitment to an asbestos ban while also committing to support the listing of chrysotile asbestos under the Rotterdam Convention.

We include key statements emphasizing the asbestos ban:

"By supporting the listing of chrysotile asbestos to the Rotterdam Convention, Canada is taking a concrete step to promote responsible management of this harmful substance globally. In Canada, we will also put in place regulatory measures to protect the health and safety of Canadians as we move forward toward a ban on asbestos."

– Catherine McKenna, Minister of Environment and Climate Change

"Breathing in asbestos fibres is known to cause cancer and other devastating illnesses. The Government of Canada is committed to reducing exposure to asbestos, and that's why we are developing regulations to ban asbestos, as well as supporting the listing of chrysotile asbestos to the Rotterdam Convention."

– Jane Philpott, Minister of Health

¹ Various organizations. Letter to Prime Minister Trudeau, "In support of a comprehensive ban on asbestos in Canada - Proposal to establish an Expert Panel to review Asbestos Management Regime in Canada," dated December 6 2016. <http://www.cela.ca/sites/cela.ca/files/L%20Asbestos%20Management%20Review%20Panel%20%28December%206%202016%29.pdf>

² Government of Canada to ban asbestos. <http://news.gc.ca/web/article-en.do?nid=1169979>

³ Various organizations. Letter to Minister Catherine McKenna and Minister Jane Philpott, "Initial response to Notice of Intention to Develop Regulations respecting Asbestos - Canada Gazette, Volume 150, Number 51 - December 17, 2016," dated January 17, 2016. <http://www.cela.ca/sites/cela.ca/files/1093-Final%20submission%20asbestos%20%28CG%20v%20150No%2051%20Dec%2017%202016%29Jan%2018%202017.pdf>

“Protecting the health and safety of Canadians is of utmost importance to our government. When it comes to asbestos, the scientific evidence is clear. Irrefutable evidence has led us to take concrete action to swiftly ban asbestos and to support the listing of chrysotile asbestos to the Rotterdam Convention. Canadians can be confident that these actions will help ensure their families, coworkers, and communities will be protected from the harmful effects of asbestos exposure so they may lead healthy, secure lives.”

– Kirsty Duncan, Minister of Science⁴

In recent months, Canada’s momentum towards an asbestos ban has faced a few but very significant challenges as a result of the failure of the global community to list chrysotile asbestos under the Rotterdam Convention, and a renewed and growing opposition by the asbestos industry and its trade association to a regulatory asbestos ban.

According to the work of the Ontario Cancer Research Centre (OCRC), asbestos is responsible for approximately 1900 lung cancer cases and 430 mesothelioma cases in Canada annually, accounting for 8% of lung cancers and 81% of mesotheliomas diagnosed each year.⁵ Given this data, we urge Canada to maintain its focus on a comprehensive asbestos ban. If we are to reduce the exposure of workers and the public to asbestos we must begin with stringent regulations to prohibit asbestos.

The following comments and recommendations build on our initial submissions to the NOI of January 17, 2017 and respond to the document titled: *Consultation on the proposed regulatory approach to prohibit asbestos and products containing asbestos* (Consultation Document) posted for public comment on April 20, 2017.⁶ All the recommendations from the January 17, 2016 submission remain relevant for government adoption. We offer the following comments on the scope and regulatory elements (e.g., exemptions, exports, mining activities) required to fully achieve an asbestos ban in Canada. We welcome the opportunity to respond to the consultation document and other efforts underway by various government departments mandated to address existing challenges associated with asbestos.

Scope of regulations for an asbestos ban should be comprehensive

Canada’s lead Ministers implementing the government-wide strategy on asbestos provided clear statements of the government’s intent to advance an asbestos ban. Overall, the consultation document outlines a proposed regulatory approach that includes many of the elements that support the government’s intent for an asbestos ban. However, there are several components in the government approach that require additional details and commentary to demonstrate the support for an asbestos ban.

The draft consultation document outlines the scope of the regulations noting specifically that all asbestos minerals [asbestos (CAS RN 1332-21-4); actinolite asbestos (CAS RN 77536-66-4); Anthophyllite (CAS RN 77536-67-5); Amosite asbestos (CAS RN 12172-73-5); Chrysotile (CAS RN 12001-29-5); Crocidolite (CAS RN 12001-28-4); and Tremolite (CAS RN 77536-68-60)]

⁴ Government of Canada. The Government of Canada supports the listing of chrysotile asbestos to the Rotterdam Convention - News Release dated April 21 2017. https://www.canada.ca/en/environment-climate-change/news/2017/04/the_government_ofcanadasupportsthelistingofchrysotileasbestostot.html

⁵ Correspondence with Occupational Cancer Research Centre, May 30 2017.

⁶ Environment and Climate Change Canada and Health Canada. Consultation on the proposed regulatory approach to prohibit asbestos and products containing asbestos. <http://www.ec.gc.ca/lcpe-cepa/default.asp?lang=En&n=A5520893-1>

belonging to the serpentine and amphibole groups would be covered under the regulations. The regulations would prohibit:

- * The import, use, sale or offer for sale of asbestos,
- * The manufacture, use, sale, offer for sale or import of products containing asbestos, and
- * The use of mining residues for construction and landscaping activities.⁷

We offer the following comments as they relate to the application of the regulations. The consultation document specifically indicates that mining residues would be prohibited under the regulations, with specific prohibition in construction and landscaping activities. We support this approach as mining residues may include asbestos fibres along with other hazardous chemicals (e.g. heavy metals, dioxins, etc) that result from mining processes and are associated with a range of impacts to the environment or to human health. However, the consultation does not outline what is meant by “mining residues” nor does it outline how “mining residues” would be managed, or which situations mining residues have been used for the production of products containing asbestos.

Recommendation 1: We are in general support of the scope and application of the proposed regulatory approach that would include all forms of asbestos covered under the serpentine and amphibole groups including asbestos (CAS RN 1332-21-4); Actinolite asbestos (CAS RN 77536-66-4); Anthophyllite (CAS RN 77536-67-5); Amosite asbestos (CAS RN 12172-73-5); Chrysotile (CAS RN 12001-29-5); Crocidolite (CAS RN 12001-28-4); and Tremolite (CAS RN 77536-68-6).

Recommendation 2: We are in general support of the application of the regulation. However, we urge the government to define “mining residues” and outline an approach for the safe management, handling and disposal of mining residues, particularly if asbestos is present.

Prohibition Approach Should Equal Zero Asbestos – Exemptions have potential to undermine Asbestos Ban

In our initial comments on January 17, 2017, we noted a need to “Achieve zero asbestos” if Canada is to implement an asbestos ban and prevent exposure to asbestos-containing products. Canada’s strategy should aim for “zero asbestos” in the scope and applicability of its regulation.

The consultation document does not provide specific commentary on this matter. However, there are several key sections in the consultation document that indicate Canada’s strategy for an asbestos ban is not set at “zero.” This is particularly clear in section 3.1.3 – General Exemptions of the consultation document. This section outlines exemptions for naturally occurring traces of asbestos and allows for asbestos and products containing asbestos that were manufactured or imported before the day on which the regulations comes into force.

⁷ Environment and Climate Change Canada and Health Canada. Consultation on the proposed regulatory approach to prohibit asbestos and products containing asbestos. <http://www.ec.gc.ca/lcpe-cepa/default.asp?lang=En&n=A5520893-1>

The government proposal to include general exemptions in the regulations may have significant implications in achieving a total asbestos ban. If these exemptions were to be included in the regulation, the asbestos ban would be severely undermined and the risk of exposure to asbestos would remain for decades to come.

Exemptions for “naturally occurring traces of asbestos” can be interpreted broadly without a definition. The range of asbestos to be considered naturally occurring can be as low as 0.1% or exceed beyond 25% asbestos content. The absence of a definition for “Naturally occurring traces of asbestos” makes the proposed exemption questionable.

The proposal to exempt asbestos and products containing asbestos that were manufactured or imported before the day on which the regulations would come into force, is also particularly problematic. The volume and quantity of stockpiles and inventories of asbestos and products containing asbestos could not be estimated at this stage of the process. The dangers associated with these stockpiles and inventories have not been subject to public consultation. If Canada is to make substantial progress on its asbestos ban, asbestos stockpiles and products containing asbestos should not be permitted to remain in the Canadian market. The government should consider adding a section in the consultation document that outlines its strategy on stockpiles and products containing asbestos. The strategy should include mechanisms for tracking, monitoring and reporting (i.e., quantity and concentration content, location, products, health and safety practices), requirements for the safe disposal of asbestos stockpiles and inventories of products containing asbestos, and timelines for final phase out date. The failure to include a strategy will pose ongoing risks to workers and the public.

The government regulatory proposal also includes proposals for specific exemptions for the following:

- asbestos or products containing asbestos displayed for educational purposes (section 3.14.1); and
- asbestos or products containing asbestos that are used in a laboratory for analysis, in scientific research or as a laboratory analytical standard in a quantity equal or above a threshold of one gram (section 3.14.2)

We do not oppose the consideration of specific exemptions under this regulatory approach. However, greater consideration as to what constitutes “educational purposes” should be provided and reviewed before exemptions are permitted. Similarly, allowing the use of asbestos and asbestos products in laboratory analysis or scientific research should also require a set of specific criteria before allowing for an exemption. It is critical that such exemptions should ensure zero exposure in laboratory and research settings where asbestos is expected to be used. Other concerns also include the lack of an upper limit for use of asbestos for these exemptions.

General comments and recommendations on exemptions

Including exemptions under the proposed regulation requires further analysis and public consultation. This can only occur after data is presented to demonstrate the need for exemptions. In situations where exemptions are permitted in extraordinary circumstances where safer alternatives are not available, strict restrictions on their use, tracking and reporting requirements are necessary. Such exemptions should be considered on a case-by-case basis and only on a time-limited basis.

Recommendation 3: We do not support the proposed exemptions for “naturally occurring traces of asbestos”. We urge the government to provide a definition for what is meant by “naturally occurring traces of asbestos.”

Recommendation 4: We urge the government to add criteria that would be applied to consider use of asbestos for “educational purposes.”

Recommendation 5: We urge the government to add criteria that would be used to consider the use of asbestos or products containing asbestos that are used in a laboratory for analysis, in scientific research or as a laboratory analytical standard. This would include establishing an upper volume limit for use of asbestos for these applications.

Recommendations 6: We urge the government to delay decisions on exemptions as they will undermine the asbestos ban. Additional data and analyses for exemptions are necessary.

Recommendations 7: In situations where exemptions are under consideration, in the extraordinary circumstances where safer alternatives are not available, strict restrictions on their use, tracking and reporting requirements are necessary. Such exemptions should be on a case-by-case basis and on a time-limited basis only.

Role of Reporting Requirements – Promoting Elements for Public Reporting

The consultation document outlines specific reporting and record keeping requirements for two proposed specific exemptions – laboratory and scientific research as well as for asbestos and products containing asbestos for educational purposes. These reporting requirements and the information collected on asbestos have the potential to monitor existing asbestos use. Given the long latency period associated with asbestos related diseases, the record keeping requirements for five years are not sufficient and do not reflect the length of the latency period associated with asbestos exposure and the subsequent development of asbestos-related diseases. It would also be appropriate for the proposed reporting and record keeping requirement to be required for all exemptions - specific and general. Finally, the data collected should be provided in an annual report that should be released to the public.

Recommendation 8: We support reporting and record keeping requirements for all exemptions. The government should also include a public reporting requirement on an annual basis.

Recommendation 9: We do not support the proposed requirement for record keeping for five years. We urge the government to ensure that report and record keeping requirements be extended for a longer time period that aligns with the latency period that is generally associated with the onset on illness resulting from asbestos exposure.

Prohibiting Export of Asbestos and Products Containing Asbestos Necessary

The proposed regulatory approach to prohibit the export of asbestos will not be included in the scope of the proposed regulations on asbestos. The government expects to amend the Export of Substances on the Export Control List Regulations under CEPA to achieve the prohibition of export of asbestos.⁸

There are several issues to consider in these efforts. It is important that a clear commitment to prohibit the export of asbestos and products containing asbestos is expressed. In keeping with the Government's strategy for an asbestos ban, the appropriate listing under the Export Control List (Schedule 3) of CEPA should be under Part 1 - Prohibited Substances which allows for exports for the purpose of destruction. Currently, the Export Control List includes one listing for asbestos for Crocidolite (CAS 12001-28-4) under Part 2 - Substances Subject to Notification or Consent.⁹ Such a listing under Schedule 3, Part 1 – Prohibited Substances would be questioned at this time given the proposed general and specific exemptions to asbestos outlined in the consultation document. All forms of asbestos (Actinolite asbestos(CAS RN 77536-66-4); Anthophyllite (CAS RN 77536-67-5); Amosite asbestos (CAS RN 12172-73-5); Crocidolite (CAS RN 12001-28-4; and Tremolite (CAS RN 77536-68-6) except chrysotile asbestos are listed under Annex III of the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade.

Amendments to add asbestos to the Export Control List (Schedule 3) should occur in parallel to the regulations to prohibit asbestos and products containing asbestos. The delay in listing to Schedule 3 will weaken an asbestos ban by providing opportunities for the export of existing stockpiles or inventories of asbestos and products containing asbestos without clear accountabilities and responsibilities.

Recommendation 10: The listing for asbestos and products containing asbestos under the Export Control List of CEPA, should be under Part 1 – Prohibited Substances for all forms of asbestos.

Recommendations 11: We urge the government to complete the listing of asbestos and products containing asbestos to the Export Control List Schedule 3 in parallel to the development of regulations for prohibiting asbestos to avoid opportunities for export of asbestos without clear accountabilities.

Timelines

The expected timeline to develop regulations to prohibit asbestos is too long, leaving substantial time for ongoing asbestos exposure and the continuance of production and use of products containing asbestos. We urge the government to review the timelines for regulatory development with a focus to pass regulations in advance of 2018.

Recommendation 12: We urge the government to review the timelines for regulatory development with a focus to pass regulations in advance of 2018.

⁸ Export of Substances on the Export Control List Regulations SOR/2013-88. <http://laws-lois.justice.gc.ca/PDF/SOR-2013-88.pdf>

⁹ See: Export Control List (Schedule 3) of CEPA. <https://www.ec.gc.ca/lcpe-cepa/default.asp?lang=En&n=22D7841D-1>

Elements absent in the Regulatory Proposal

We noted a few issues that have yet to be addressed through the regulatory development process. These issues were noted in our submission of January 17, 2017.

- 1) Asbestos contamination should be avoided – The consultation document has yet to address the issue of asbestos contamination in products or in waste-containing material.
- 2) Comprehensive public engagement – The government has limited public engagement to advance an asbestos ban in Canada that includes public comment periods related to the release of the Notice of Intent and the consultation document. A multi-stakeholder webinar was also organized associated with the release of the consultation document. While these opportunities are welcomed, there are significant benefits to multi-stakeholder workshops and additional webinar opportunities to gather public input to government proposals. The voices of all stakeholders, public health and environmental non-governmental organizations, labour organizations, Indigenous communities, women’s advocacy organizations, communities affected by asbestos (particularly victims and families of victims), medical professionals and academia (in the research and practice realms), should be pursued.
- 3) Rigorous enforcement and compliance mechanisms – the consultation document does not outline the enforcement and compliance strategies that will be implemented on asbestos.

Canada’s asbestos strategy should be expanded

The government’s announcement on asbestos on December 15, 2016 included the following elements:

- establishing new federal workplace health and safety rules that will drastically limit the risk of people coming into contact with asbestos on the job;
- expanding the current online list of asbestos-containing buildings owned or leased by the Government of Canada;
- working in collaboration with our provincial and territorial partners to change the national, provincial and territorial building codes to prohibit the use of asbestos in new construction and renovation projects across Canada;
- updating its international position regarding the listing of asbestos as a hazardous material based on Canada's domestic ban before the 2017 meeting of parties to the Rotterdam Convention, an international treaty involving more than 150 countries that support listing asbestos as a hazard; and
- raising awareness of the health impacts of to help reduce the incidence of lung cancer and other asbestos-related diseases.

We are very supportive of these efforts. We also encourage consideration of the following activities:

- 1) **Establish an Expert Review Panel:** An Expert Review Panel would be tasked to review and make recommendations concerning on-going challenges with asbestos in Canada.
- 2) **Address “Just Transition” Issues:** The timing to consider “just transition” matters should be initiated now. The asbestos ban will affect some communities, families and workers across Canada. Substantial discussions are required to address these

challenges and to develop strategies, including technical and economic support, to assist these communities make the transition from asbestos. Such discussions may include, but are not be limited to, focus on remediation activities targeting closed asbestos mines, potential socio-economic opportunities for affected communities and workers

- 3) **Establish Asbestos Registries for Buildings and Victims:** The government proposal to expand the federal registry is welcome. Registries should be expanded to include other buildings/sites including privately owned buildings containing asbestos. Furthermore, there is also a critical need to establish a national registry for victims experiencing asbestos related diseases.
- 4) **Enhance Awareness Programs on Asbestos Related Diseases** (e.g., lung cancer, asbestosis, mesothelioma) to help reduce the incidence of lung cancer and other asbestos-related diseases, including supporting a national mesothelioma health care network to coordinate research on improved detection and treatment of these deadly diseases.
- 5) **Asbestos Removal and Waste Disposal Management Regimes:** Public dialogue should be pursued with respect to the federal-provincial authority on waste management in Canada with an aim to develop best management practices for waste containing asbestos, and to establish national standards related to waste containing asbestos. Such issues are of significant relevance to sectors such as the construction and demolition sectors where workers' health and safety are at risk from asbestos exposure.
- 6) **Improve Reporting on Asbestos Releases and transfer under the National Pollutant Release Inventory (NPRI):** Reporting on asbestos under the NPRI has been required since 1993. Generally, the reporting threshold (e.g. employee number, volume threshold) under NPRI results in only the larger facilities reporting pollutant releases and transfer data. Asbestos (friable form) is subject to reporting under NPRI. For improved reporting on asbestos releases and transfers, a review of the NPRI reporting threshold on asbestos is warranted.

We welcome the opportunity to discuss these comments with you. If you have any questions regarding our submission, please do not hesitate to contact us.

Thank you for your consideration.

Yours truly,

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