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The Asbestos International Association for environmental and occupational health protection wherever asbestos or other fibres are used for the same purposes

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Submission to the Social, Health and Family Affairs Committee of the Council of Europe

Delivered by Brian Taylor
on behalf of the European Advisory Council of the
Asbestos International Association

Paris
10th November 1997

◊ On behalf of the European Advisory Council of the Asbestos International Association I welcome this opportunity to address this meeting of the Social, Health and Family Affairs Committee of the Council of Europe at this time when consideration is being given to the Report on Asbestos prepared by Mr.Cox.

◊ The Asbestos International Association is an organization of national asbestos associations representing 37 countries. AIA's principal objective is to promote the safe use of asbestos and any other fibres used for the same purpose worldwide. The EAC represents AIA members in the European Union.

◊ I am of course aware of the much wider composition of the Council of Europe but perhaps you will bear with me if some of my references seem particular to its smaller component, the European Union. While the northern countries of the EU have generally phased out the use of asbestos or are finalising the process, some southern countries still rely very heavily on asbestos cement to satisfy their particular domestic needs. A number of Member States of this broader Council may well have similar needs.

◊ While the EAC finds itself in general accord with some of the preliminary recommendations in the Cox Report, it must respectfully take issue with the rapporteur's conclusion that the elimination of future uses could be an effective solution to the asbestos problem.

- ◊ On the contrary the products currently manufactured and marketed under the controlled use policy practised world wide do not endanger workers, public health or the environment, when they are installed and managed as recommended. As such, there is no valid justification for any further restriction of their use.

- ◊ Furthermore a ban on such products would be largely irrelevant and irresponsible because by promoting the impression that the problem no longer exists, it will divert the attention that is required to address the legacies from the past. The real areas of concern relate to friable asbestos, sprayed applications and insulation in existing installations.

- ◊ In the European Union, like elsewhere, health and environmental policy is rightly being determined by scientific risk assessment and cost/benefit analysis.

- ◊ Recently at the Amsterdam Summit the EU Member States agreed that any new measures to protect the public health in the Community's citizens should be based on science. The ILO, in its dealings with asbestos, commended in the Cox Report, has consistently maintained a balanced scientific base for its recommendations. It particularly insists that substitutes for asbestos should be evaluated scientifically by the competent authority to determine whether they are harmless or less harmful before adoption.

- ◊ It is worth recalling that in the United States the 1989 prohibition of most asbestos-containing products was removed in 1991 because banning was considered too burdensome a solution, for some products the alternatives were no safer, and it was not proven that the benefits of the ban outweighed its costs. At that time the U.S.Environmental Protection Agency (EPA) calculated that the cost for each premature death which might be prevented was US $110 million. Today, the United States consumes about 22.000 tons of chrysotile per annum. Product uses include roofing sealants, gaskets, friction materials and asbestos cement pipes and sheets.

- ◊ To understand the legacy from the past one must clearly distinguish between different fibre types. Asbestos is the generic name for naturally occurring minerals with the common characteristic of fibrous form and the ability to sub-divide into individual sub-micron diameter fibrils.

- ◊ The serpentine asbestos chrysotile (white) is markedly different from the other group collectively known as amphiboles (crocidolite (blue), amosite (brown) and the lesser used varieties anthophylite and tremolite).

- Unlike the amphiboles which are generally rich in iron and have sharp needle like fibres giving high strength, heat and acid resistance, chrysotile is a very different hydrated magnesium silicate with no iron in its basic formulation. Its fibres are softer and curly. It has less chemical and physical stability and most importantly is readily attacked and dissolved by the natural acids found in the lungs.

- These different qualities result in markedly different potential health effects. It is now generally recognised that chrysotile is much less durable (biopersistent) than the amphiboles and its retention in the lung tissue may be a matter of months rather than decades.

- Whilst all asbestos fibres have been classified as human carcinogens, the amphiboles have by far the greater potency. The debate continues as to whether, as appears likely, a threshold exists below which chrysotile will not cause any asbestos related disease. The fact that chrysotile is less biopersistent than the amphibole asbestos fibres supports the threshold concept.

- Whilst the report does note these differences, the rapporteur's conclusion that even slight exposure appears to entail serious health risks requires qualification. What is slight exposure? - Exposure to what? Certainly for chrysotile the statement is quite wrong as recently published peer reviewed scientific data shows that there are low levels (~1 f/ml) of exposure to chrysotile which are not associated with increased risk to workers and also that the level of exposures typical of the general environment are not associated with any measurable risk to the general population.

- The legacy of the past is the occurrence of asbestos related diseases arising from the period before effective controls were introduced, caused by :

    - high dust concentrations in manufacturing operations and product applications.

    - the widespread use of friable products from which respirable fibre release was easily induced e.g. sprayed asbestos applications, low density insulating boards and textiles.

    - the use of amphibole asbestos in such products because of their unique strength, fire and acid resistance qualities.

- The controlled marketing and use policy in the EU dates from 1970's in some countries and from the mid 80's Community wide. In addition there are strict controls on the exposure of workers to asbestos and for the release of asbestos fibre to environmental air, water or ground. Indeed asbestos containing products are regulated throughout their full life cycle.

- In a recent Communication (1996) to the Parliament and Council of Ministers on the 'Protection of Workers from Risks Related to Exposure to Asbestos at Work' the Commission stated that the measures provided by the existing Community legislation continued to demonstrate their validity in the global framework of the protection of health of workers exposed to asbestos.

- Other analyses of the distribution of disease incidence have shown that controls in the factory environment where enforcement has been concentrated have been effective.

- Whilst a number of national organisations including the UK-Health and Safety Executive have made disturbing projections about future numbers of deaths likely to be attributable to asbestos, they relate largely to exposure to amphiboles which are no longer used. It would be wrong to use these to justify a ban on chrysotile.

- However, these projections have drawn attention to the fact that greatest risk now involves exposure to materials in place. The high risk groups are now thought to be construction and allied trade workers engaged on maintenance, renovation and demolition who are liable to experience intermittent short high dose exposures, possibly without adequate controls. The risks relate predominantly to spray applications and insulation materials containing amphiboles.

- This has pointed to the need for effective management programmes. Several countries already have asbestos inventorisation programmes. The inventorisation of asbestos and asbestos containing products in buildings and workplaces as it exists in Belgium, more recently in France and as it is being developed in the UK is an appropriate tool to identify and manage the risk of exposure to asbestos in place.

- Adequate protective measures can be taken if it is known that exposure to asbestos may occur during work activities.

- Nevertheless asbestos containing materials in good condition and properly managed do not present a health hazard to either the occupants or the general public and unnecessary removal should be avoided as this creates unnecessary risk.

- A number of different studies for the European Commission on the current scientific knowledge about the hazards and risks of chrysotile have suggested that while there may be safer alternatives available for many products for which chrysotile is currently used, the extent of the health risk from current chrysotile products is more open to debate

- The Commission is seeking further data on current low level chrysotile exposure as extrapolation from higher occupational levels may distort the reality and give over pessimistic results.

- The Commission is also seeking research data on the health effects of substitute fibres. Such information is scanty but is required to assess the relative hazards and risks of these materials.

- At the request of the Member State Representatives the Commission is also commissioning a study of the socio-economic effects of substitution.

- The socio-economic factors which do support the continued use of chrysotile cement products should be noted. They have low costs and low energy input, can be locally manufactured using local resources and generating local employment. Basic problems such as storage and distribution of water, sewage disposal, irrigation and low cost housing are best solved by chrysotile cement products.

- Sixty per cent of EU chrysotile cement production is actually concentrated in Greece, Portugal and Spain. Production is devoted almost exclusively to pressure pipes for which no satisfactory fibre alternative is available, and to roofing applications, mainly agricultural, where the extra cost of alternative fibres is not always economically supportable.

- In these Mediterranean countries there was much less historical use of the insulation products which gave rise to the higher incidence of disease in the colder northern countries.

- The gross energy content of chrysotile cement products is far below that of alternative construction materials which in consequence also leads to another benefit, significant reduction in CO_2 emissions.

- Whilst most chrysotile is used in asbestos cement products it should be clearly understood that there remain needs in Europe for specialist technical products, such as chrysotile reinforced composites, gaskets and sealing materials for use in engineering, petrochemicals and other industrial processes operating at high temperature and/or pressure, or other extremely demanding conditions. For chrysotile to be available for these essential uses, the mining activity has to be maintained at an economical viable level.

- Asbestos is an issue which continues to raise strong emotion but this should not be allowed to dominate or distort reason in formulating public policy.

◊ The current EU legislative framework, if correctly followed by employers and employees, appears adequate. Intensified enforcement by the competent authorities and worker information campaigns are commended as essential elements in alerting workers to possible hazards.

◊ It is understood that legislation and policies similar to those of the EU are now being rapidly adopted by many members of the Council of Europe in preparation for joining the European Union.

◊ However, in the light of the unacceptable incidents in Eastern Europe recounted by the rapporteur it would appear that the playing field is far from even and that there is urgent need for improvement in worker and environmental protection.

◊ The EAC considers that objective and balanced information about asbestos which puts the risks and remaining uses of chrysotile into their proper perspective is the preferred option rather than creating unnecessary and unjustified public concern. The full framework of current asbestos regulation developed progressively by WHO, ILO and the European Community could now form the blueprint for adoption in the other Council of Europe countries.

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