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COMMUNIQUE

SCIENTIFIC COMMUNITY UNANIMOUS IN DENOUNCING THE BANNING OF ASBESTOS AS FORMULATED IN THE EPA'S PROPOSED RULES

Montreal, April 22, 1986. - The scientific community is shocked by the methodology used by the U.S. Environmental Protection Agency (EPA) in recommending a total ban on asbestos in the United States. The EPA recommendation is at odds with the findings of the most recent scientific studies on the subject. In addition, the substitute products suggested by the EPA could involve new, as yet unknown health hazards.

These conclusions are derived from analyses done on the EPA document by 12 researchers from Canada, the United States, France and Great Britain. Their reports were made public today by the Asbestos Institute during information briefing devoted to a review of the EPA's proposal to ban asbestos.

The scientists consulted by the Institute include university researchers and professors, epidemiologists, toxicologists and specialists in biostatistics, biomathematics and environmental sciences. All are highly regarded for their work on the biological effects of asbestos.

A suspect scientific basis

The experts' initial observations dealt with the scientific data cited by the EPA to support its proposal. They are unanimous in stating that the report of the American agency contains major deficiencies from both the scientific and methodological viewpoints.

Thus, Drs. J. Corbett McDonald and Alison A. McDonald of Montreal's McGill University feel that the authors of the EPA report "have in fact presented a 'worst estimate' of the risk by citation of selected and biased evidence".

Professor Alain-Jacques Valleron and Dr. Guy Thomas, both associated with the Université de Paris VII, say that the EPA

report does not meet any of the universally recognized scientific standards and that "using the conclusions of this type of report for regulation purposes would seem to be abusive".

"Crude guesstimates"

Professor Jack Siemiatycki of Montreal's Armand-Frappier Institute asserts that "the estimate of risk by the EPA is based on crude 'guesstimate'. In this light, the Montreal epidemiologist says, "the proposed ban on asbestos would be something of an expensive gamble".

In a highly detailed analysis of the EPA document, Professor Arthur M. Langer, associate director of the Mount Sinai Medical Center's Environmental Sciences Laboratory in New York, points out that the environmental data used to support the agency's position "are not that good". Notes Dr. Langer: "The statement that asbestos has been studied most often and 'thoroughly' for its effect on humans suggests to the reader that these data are unassailable. This is simply not the case."

"Obscure references"

Doctor John C. Gilson, who until recently was director of the Medical Research Center of the Pneumoconiosis Unit in Penarth, Great Britain, believes that "the EPA has not made a convincing case for banning all asbestos". Finally, professor Patrick Sébastien of McGill University's Occupational Health Department agrees with virtually all of the specialists consulted, who have pointed out that the report of the American agency contradicts the majority of the most extensive studies carried out on this subject around the world. Professor Sébastien deplores the fact that the scientific references in the document "come from obscure studies".

Different types of asbestos

In their evaluation of the EPA report, the experts are unanimous in criticizing the EPA for not making a distinction between the various types of asbestos.

For Dr. J.M.A. Davis, head of the Pathology Department of the Edinburgh Institute of Occupational Medicine in Great Britain, this approach "ignores a vast amount of epidemiological evidence that chrysotile is a much safer material than the amphiboles".

In the same vein, the McDonalds reject the idea that all fibres have the same biological effects and confirm that this postulate "is at odds with majority scientific opinion throughout the world".

Professor Langer, who also disagrees with the EPA's attempt to group all types of asbestos together, believes that "chrysotile asbestos should be permitted in the manufacture of vinyl asbestos tiles, friction products and asbestos cement pipe". The New York scientist, who emphasizes that the use of chrysotile asbestos must be subject to rigorous controls in the work environment, is nonetheless in favour of banning crocidolite and amosite.

The dangers of substitution

The EPA proposal to systematically replace asbestos with various substitute products is unanimously criticized by the 12 experts consulted.

For example, Professor F.D.K. Liddell, of McGill University's Epidemiology and Biostatistics Department, finds no justification for the EPA's numerous assertions that the replacement products would be safer than asbestos. "Using market forces to encourage the more rapid development of substitutes is hardly a guarantee of the safety of the substitutes".

Dr. Raymond Bégin, head of the Pneumology Department of the University of Sherbrooke's Hospital Centre, points out that the biological effects of the substitutes proposed by the EPA have not yet been adequately evaluated and that "several of these materials may well be at least as biologically active as asbestos".

Professor Siemiatycki says the theory that substitute products would pose less risk than asbestos "may not stand up to scrutiny". Professor Siemiatycki also noted that "studies of workers exposed to man-made mineral fibres in the U.S. and in Europe may be interpreted as showing risks of lung cancer comparable to those seen with asbestos."

According to Dr. Davis of Great Britain, "present knowledge suggests that any fibrous product that has fibres of the same dimensions as asbestos and the same fibre durability in lung tissue will be equally hazardous."

Potentially carcinogenic products

Professor Langer of the Mount Sinai School of Medicine, who has analyzed the preliminary tests carried out on a half-dozen products proposed as replacements for asbestos, points out that these tests have shown that the products in question are potentially carcinogenic.

Professor Sébastien believes that "it is unwise in terms of public health to propose several mineral fibres to replace asbestos in its multiple uses. In fact, that would only compound a variety of uses with a variety of pollutants, making the situation even more difficult to control, both on the level of industrial hygiene and of the environment."

Because of the many uncertainties involved in the use of substitute products, the experts recommend that these products be subject to regulations and standards that are as strict as those imposed on asbestos.

A questionable cost/benefit ratio

Although not all of the experts touched on the EPA's analysis of the cost/benefit ratio in banning asbestos, those who have examined it generally tend to question its validity.

Dr. Gilson feels that the EPA has not provided sufficient information to establish the cost elements: "The EPA give us no information on the reliance to be placed on the cost figures". According to the McDonalds, to claim that preventing cancer deaths saves money is almost certainly untrue: "If economic arguments are used, they should be correct."

The McDonalds point out that "several asbestos products are primarily concerned with safety. Does EPA have the authority to require that alternative products meet precisely the same specifications or better? If not, the proposed rules could have a net adverse effect on health."

In the opinion of Professor Liddell, the cost of replacing asbestos is "astonishing". According to the method of calculation used by the EPA, this would involve an investment of \$2 billion to prevent 1,000 fatal cancers, or \$2 million for each case.

Professor Siemiatycki feels that the price they want the American public to pay is disproportionate to the results they hope to achieve: "From a public health viewpoint, more lives and years might be saved by investing in anti-smoking campaigns, anti-alcohol campaigns, transportation safety or other public measures."

Controlled use of asbestos

Along with many of his colleagues, Professor Langer rejects the notion of banning asbestos as proposed by the EPA: "Can a resolution be achieved to protect the general population and still use asbestos safely? I think yes. By elimination of amphibole asbestos, banning of cigarette smoking in specified buildings, structures, and workplaces, workplace controls and workpractices, and use of safe substitutes, this can be achieved."

Dr. Robert Murray of the London School of Hygiene and Tropical Medicine in London, England, who is also president of the International Association of Occupational Medicine, finds that the EPA proposal is an unjustified action "which borders on almost obsessive paranoia". Noting that society has learned how to control many dangerous industrial substances such as phosphorous and carbon bisulphite without having to ban them, Dr. Murray suggests adopting a similar approach to asbestos, "whose risks can be controlled".

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