COPY LETTER FROM
TURNER BROTHERS ASBESTOS COMPANY LTD.

G. Alderson, Esq.,
Newalls Insulation Co. Ltd.,
Washington.

JW/AR

Copies: NAM/JAEC/JLC/NLD/JFK/1 Spare

10th February, 1958.

Dear Mr. Alderson,

Draft Revised Shipbuilding Regulations.

Mr. J. L. Collins has suggested that I should take part in the proposed meeting with the Ministry of Labour, not only because of the interest of J.W.R. Ltd. in Regulation 70(a) and 70(c) but also because my experience at the Engineering Branch of the Factory Inspectorate before 1948 might be of some help. He has let me see copies of the letter he wrote to the Ministry on behalf of T. & N. Ltd. and also the letter Mr. McCarrick sent on behalf of the Thermal Insulation Contractors Association on 3rd February. I have also, of course, had some discussions with Mr. Dolbey.

In these circumstances you will, I hope, not feel that I am intruding improperly on Newall's field if I make some observations and suggestions. Mr. Collins suggested that I should write directly to you.

1. Although the Group's record of asbestosis in application work is small, I believe other contractors, both here and abroad, have also had cases, and I do not think there is a great deal of hope of the Ministry withdrawing the Regulation altogether. This objective will, of course, be pursued to the limit, using the statistics of diminishing incidence which Mr. Collins is assembling.

2. If we are eventually repulsed in this, it is obviously essential to have both the definition in Regulation 3(1) and Regulation 70 itself amended substantially. In this we would, I think, be wise to put forward not only arguments but also actual amended wording, and I enclose my suggestions, for your criticism.

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3. I take it that our objectives are

(i) to avoid any unnecessary obligations which could be troublesome to enforce or which could cause difficulty in recruiting labour;

(ii) especially to avoid obligations which would give a competitive advantage to non-asbestos materials such as glass fibre.

4. I believe that the Ministry will be reasonably sympathetic about (i) but they will not be much interested in (ii) and may even have a preference for non-asbestos materials, just as they have encouraged the use of non-lead paints for many years. There is, I believe, no evidence of health risk with glass fibre or mineral wool and we can only hope that the skin irritation they cause to applicators and other trades in the vicinity will raise Trade Union objections. The definition of "asbestos" is copied from the Asbestos Industry Regulations, 1931, and I do not think it was the Ministry's intention that it should include glass fibre: I am surprised to learn from Mr. Collins that Fibreglass Ltd. fear that it does, since I should have thought that glass was not a "fibrous mineral". It may be "silicate mineral" (though I am inclined to doubt that too) and if so my wording should include glass fibre as well as mineral wool. Further, my wording would, I think, exclude asbestos-cement sheeting or asbestos wallboard, which could be considered as within the present definition. It would also exclude your 85% magnesia materials and would presumably mean that Regulation 70 would affect Newalls only in the dry mixing of compounds, the application and removal of asbestos rope lagging, and in spraying.

5. We shall be lucky, however, if we persuade the Ministry to put in the percentage limitation, and that is why I have tried to amend Regulation 70 itself to exclude the processes such as clipping on of mattresses or moulded sections which involve no dust. I have had to include the sawing of sections, since that is clearly a dusty operation, but the limitation to eight hours a week of actual sawing and breaking should let most people out. (There is a precedent for the eight-hour limitation in the first Proviso of the Asbestos Industry Regulations, 1931).

6. The proposed inclusion of people working "in the vicinity" should be most strongly resisted. I think we should challenge the Ministry to produce a single case of asbestosis in a workman not employed in the insulation industry itself. If they did prove stubborn about this point in the end, we should press for amendment to "in close proximity to" and also for an eight-hour minimum for any workman. In the case of Spray

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we have a report of dust counts made in October, 1949, by Mr. J. S. Evans, H.M. Engineering Inspector of Factories, which shows that, with damping in standard machine but without pre-damping in the drum, the dust close to the spraying operation is only about half that found in flyer spinning of yarn, which is considered as a safe process and is excluded from the Asbestos Industry Regulations. The use of respirators by the Spray operators themselves is, therefore, merely an extra precaution.

I am sorry that this has become an inordinately long letter but I hope it is clear. I am sending copies with the enclosure to Mr. Collins and Mr. Dolbey and perhaps you would include them on the circulation of any comments you may make - or you may prefer to address your comments to Mr. Collins direct.

Yours truly,

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