Brake components such as linings have high exposure in the safety compliance, recall and product liability areas. Therefore, vehicle manufacturers must be certain they are not correcting one problem and creating another. It should be pointed out that this was exactly the case with FMVSS-121. The performance levels and effective date mandated by that Standard generated the hasty development of components which were unacceptable to the consumer and which introduced new performance problems. If justification is found for a change of this magnitude, sufficient time must be provided to assure that existing linings will not be replaced with others the consumer will not accept.

Linings are a key factor in any brake design and asbestos is a key factor in many lining materials. If asbestos is eliminated from brake linings, manufacturers must retest and requalify every vehicle brake application they have, had or plan to have. There are more than five hundred brake and brake lining sizes*/ designed for vehicles still in use that must be serviced. It would be a monumental task with substantial economic involvement for service part suppliers to develop non-asbestos replacements for those applications.

D. Summary and Conclusions

For the majority of the asbestos applications in motor vehicles, acceptable substitute materials are in varying stages of development. It is possible that many substitutions, i.e., fillers and sealers, can be accomplished in the next few years. However, there are certain critical uses of asbestos for which finding acceptable substitutes will take considerably longer. These are heavy truck brake linings and engine preformed gaskets. These special applications will require system redesign to accommodate the properties of non-asbestos materials.

*/ See Friction Materials Standards Institute Automotive Data Book

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