FILE NAME: Asbestos International Association (AINT)

DATE: 1978 Oct 11

DOC#: AINT007

DOCUMENT DESCRIPTION: Letter to Raybestos Manhattan from AINT RE Status of Asbestos Labeling

[Note - Many originals are on legal size paper so text looks small when reprinted on 8.5x11 paper]

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ASBESTOS INTERNATIONAL ASSOCIATION

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AIA/8/PAC

11 October 1978

We spoke about your letter of 2 October concerning the German distributor and his suggestion about labels.

My sources of information indicate that the German distributor has got his facts wrong and that at this moment in time there is no question of asbestos attracting any label.

DG III of the EEC Commission has two Study Groups going on this matter - one concerned with the classification, packaging and labelling of dangerous Substances and one ditto for Preparations. Asbestos is a "substance" by definition, and, while now nearly 800 substances have been listed as dangerous (another 120 are in the pipe-line), asbestos is not yet included as one of these.

Because asbestos does not easily fit into any of the current classifications of dangerous substances, it may avoid being listed at all. However, this is probably wishful thinking and eventually asbestos will be put on the list. There then comes the questions "which class of substance is it?". The choice narrows down to "Toxic" or "Harmful", each with its own symbol, and the German distributor has decided on "Harmful" with its associated St. Andrew's Cross symbol.

He may be right and it would certainly be better for the industry than "Toxic" with a death's head symbol. However, he is "jumping the gun", and in so doing may pre-empt our efforts to use an industry label and symbol.

As you know, we feel that if we can use a specialised asbestos label, which we can show is used in many countries, the EEC may accept our particular label since asbestos is an unusual and particular substance. It is worth trying since it may be successful, and anything is better than the death's head label!

To answer the particular questions in Harry Rhodes' letter:

(a) all;

(b) N/A - see above

(c) N/A now - but whatever EEC agrees to is usually accepted by other European countries;

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(d) no;

(e) N/A now - but I should have thought that a sealed container would not require this label

(f) Asbestos Labelling. UK has a voluntary labelling scheme for asbestos using the special "a" symbol and special wording. Other EEC countries agree the UK form of logo with similar wording, but at present are undecided about when to start using it.

Other Labelling . The EEC Directives on the labelling of Dangerous Substances and Preparations referred to above have to be put into effect by all EEC countries in due course. The UK passed a law this year putting the latest EEC labelling etc. directive into the national law book.

I am copying this letter, and yours, to Henry Vanherle, who will send you relevant EEC material, and will also add information on labelling should I have missed out anything of substance.

Yours ever

Jimmy

Sir Neville Stack

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