ASBESTOS INTERNATIONAL ASSOCIATION

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68 GLOUCESTER PLACE, LONDON W1H 3HL

CC/AED

MEMORANDUM

VII.E.11

TO: Member Associations

AIA/41/NEWS

FROM: Director-General

August 1980

PLAINTIFF'S EXHIBIT

UC-3937

AIA NOTES FOR ASSOCIATIONS

1. The previous issue of these notes was in July 1979; the subsequent twelve months have been marked by a number of events each of considerable significance to the asbestos industry:-

   (a) Publication of the long-awaited report by the UK Advisory Committee on Asbestos (ACA).

   (b) EPA and CPSC proposed rule making on asbestos, and AIA/NA reaction to this (USA).

   (c) Proposed legislation concerning dangerous substances in Germany.

   (d) Confirmation of the anti-asbestos legislation in Denmark.

   (e) The IARC conference at Lyon in September 1979 at which the ScAP met for the first time.

   (f) The QAMA-sponsored meeting at Montebello, PQ.

2. Details are included in relevant paragraphs; to enable busy readers to select the items which interest them the Notes are indexed.

3. As Members will now be aware, much of the work of the Association devolves on the ten Panels whose task is to advise the Executive Committee (Chairman Dr. Gaze). Using this information the Executive Committee takes necessary action with authority derived from the Governing Council (Chairman Mr. van der Rest).

4. Members might like to be reminded that the Panels' advice can vary from the highly technical to the semi-political. For example, the EEC Advisory Council enables industry to be warned when matters concerning asbestos are being considered in the EEC Institutions; this gives industry an opportunity to make its voice heard. Dust measurement is a critical issue for asbestos and the Dust Measurement Advisory Panel enables us to bring to bear on the subject the highest possible quality of scientific expertise. In matters of medicine our industry doctors try to achieve an identity of views through the Medical Advisory Panel, and our Scientific Advisory Panel gives us the considered opinion of eminent outside medical specialists on

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31 JULY 1980

AIA NOTES FOR ASSOCIATIONS

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our problems. Advice on how to put the AIA viewpoint to governments, the public etc. comes from our Communications Advisory Panel. The names of the remaining six Panels clearly indicate their function.

The items in these notes owe much to information which has appeared in:- AIA/NA's News & Notes; the QAMA Bulletin; the Amianthus Information Bulletin and the magazine "Asbestos" - to all of whom many thanks.

T A Stack

Sir Neville Stack
Director-General

cc: Governing Council
Executive Committee
Chairmen of Panels
CAP Members

NOTE: Because of the difficulties of knowing how many copies to send each Member Association, together with the administrative load which would be imposed on my small staff, I am sending only one copy to each Association in the hope that further copies can be made as needed.

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AIA/41/NEWS

JULY 1980

A.I.A. NOTES FOR ASSOCIATIONS

(For Period July 1979 - July 1980)

EEC Advisory Council (EAC) (Chairman Mr. K. Thiele)

1. Six meetings were held during the period. A recent meeting was held in Aalborg when the opportunity was taken to visit the Dansk Eternit Factory. The 16th meeting was held in Milan - a visit was made to the Balangero mine and delegates also met representatives of the Italian asbestos industry. Details of EAC business are shown at paras. 22 to 39 below.

Dust Measurement Advisory Panel (DMAP) (Chairman Dr. K. Robock)

2. This Panel has held three meetings during the period: these were held in Neuss, Costa Rica and Cannes. The DMAP produced the Standard Reference Method (RTHI) (see para. 66 below) in time for the Lyon Conference and is now addressing itself to the problem of measuring the dust content of ambient air and of dust emissions from factories. The DMAP sponsored the recent successful Third Dust Colloquium at Cannes on 10/11/12 June 1980 (see paras. 52 and 53 below) which was hosted by the Chambre Syndicale de l'Amiante (CSA) France. The next DMAP meeting will be on 3/4/5 September 1980 at Denver, Colorado.

The Medical Advisory Panel (MAP) (Chairman Dr.S.F. McCullagh)

3. There have been two meetings of the MAP (their 3rd and 4th) in the period. The paper on standardising criteria for the diagnosis of asbestos-related diseases is nearly complete.

4. The drafting of an agreed format for recording the health data of work people has brought to light the difficulty of reconciling the numerous recording methods already in use by member companies.

5. After reviewing this difficulty the Executive Committee has decided that the problem of compiling a standard health-recording form (since it also involves the recording of dust levels) should be incorporated in the work of a special study group on epidemiology to be chaired by Dr. Robock. The Study Group's terms of reference are: "To make recommendations on what the AIA should do to encourage Member Associations to:-

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(a) Undertake more epidemiological investigations.

(b) Facilitate the uniform collection of data."

6. It has been further decided by the Executive Committee that the MAP's tasks should be made less burdensome by making their terms of reference more specific and reducing them in number. These are now to be:-

"1. To standardise the criteria for the diagnosis of asbestos-related diseases (this task is nearly finished - para. 3 refers).

2. To advise on suitable Conferences for attendance by AIA representatives. (this is an on-going requirement.)

3. To make recommendations to the Executive Committee concerning the training of doctors involved in the diagnosis of asbestos-related disease - this will involve the interpretation of X-ray pictures and the results of lung function tests. (this is a new task.)"

The Building and Construction Advisory Panel (BCAP) (Chairman Mr. Y. Alexandre)

7. The BCAP has now held five meetings all of which have been involved in discussing various drafts of an Advisory Document which lists tools for use with asbestos cement. (See para. 67 below.) These tools have first been tested at the Asbestos Institute at Neuss under conditions which simulate on-site work. This has been a most demanding task since great accuracy is required and a large number of tools have had to be tested. We owe a considerable debt to Mr. Teichert and the Asbestos Institute at Neuss. Acknowledgements and thanks are also due to those who have sent tools for testing from as far away as the western U.S. and eastern Australia.

8. It was hoped to have a draft of the Advisory Document ready soon for consideration by the Executive Committee but final agreement within the Working Party is proving more difficult than expected.

The Fibre Producers Advisory Panel (FPAP)(Chairman Mr. J.P.M.Hutcheson

9. Following the Panel's meeting in June 1979 all major western fibre producers now show the "a" logo on their bags. This is a

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considerable achievement and the AIA has written to the concerned Commissioners of the EEC so to inform them. The AIA has also been in touch with Rhodesia, Russia and Yugoslavia, to try and persuade them to follow suit.

10. The new advisory document "Asbestos Fibre Handling" (RCP 4) is now issued (see para. 66 below) and the first draft for the document on "Bag Opening" (see para. 67 below) has been written.

The Communications Advisory Panel (CAP) (Chairman Mr. C.X. Latty)

11. This Panel has now had seven meetings. Following its recommendations both an "Industry Statement" and an "Information Digest" have been produced in pamphlet form (see para. 68 below). The CAP has recently been asked by the Governing Council and the Executive Committee to progress recommendations made at the April 1980 Montebello Conference in Quebec on "Communications & Asbestos" (see paras. 50/51 below).

12. The CAP has endorsed and the Executive Committee has now approved certain recommendations of the Montebello Conference. Chief of these are:-

1. To hold a special World Conference on asbestos & health during 1981.

2. To assemble all papers concerning asbestos & health (this task is being undertaken by IPDA*).

3. To devote half a day of the 1981 Biennial Conference to Communications.

4. Countries who have not already done so to be advised to conduct a review of their national asbestos & health situations.

5. To have an AIA/NA member on the CAP.

13. The CAP continues to advise the Executive Committee on immediate communications issues and has played an important part in drafting AIA comment to the UK HSE on the ACA report (see para. 101 below).

* Institute for the Research & Development of Asbestos - (A CANA/Quebec Government-funded Institute.)

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Friction Materials Advisory Panel (FMAP) (Chairman Mr. H. Doussier)

14. Two advisory documents on Friction Materials are nearing completion together with a background "position paper" on the friction material industry. At the first FMAP meeting held at Cologne on 22 April 1980 the most recent draft of the position paper was agreed and this has been sent for a second look to Executive Committee members for their approval. The second FMAP meeting was held in London on 23 July 1980.

Scientific Advisory Panel (ScAP) (Chairman Dr. J.C. Gilson)

15. The Panel met for the first time on 28 September 1979 after the IARC meeting at Lyon (see paras. 47/49 below) and thirteen out of the full membership of fourteen attended. As the total membership included scientists from as far away as Australia, Canada, Japan and the U.S. this was very gratifying. The ScAP made two main recommendations enlarged on at paras. 16 and 19 below.

16. Firstly the Panel strongly advised the industry to assemble data on areas of low dosage. They suggested that this could be done by locating a factory, mine, mill or other site where low dust levels were considered to have existed for a long time and where the work force was of a reasonable size for a worthwhile investigation.

17. When such a plant had been located it should become the subject of a study which might well show that a long-established work force subject to low dosage had no asbestos-related disease. With this information the industry would be able to put forward the concept of an "acceptable level of risk". However, while the disease data for past years can perhaps be obtained, it is almost impossible to obtain dust level figures from the past because records are not available. (See paras. 56 - 58 below.)

18. More recently the Chairman of ScAP, Dr. Gilson, and Dr. Hans Weill have suggested as an alternative that we make a world-wide industry radiograph investigation. (See paras. 59 - 62 below.) They advise that this could have three results:-

(a) It might show that the asbestos workers' health is generally much better than suggested by industry's critics.

(b) It could form the basis for a comparability study if carried out at regular intervals (say, every 4 years).

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(c) The figures could carry considerable authority since they would be on a world-wide basis.

19. Secondly, the ScAP at Lyon advised that there should be a long-term investigation into lung burden as a measure of asbestos exposure. Such a study would need sophisticated equipment and highly skilled technical staff. The AIA is therefore trying to collaborate with the EEC Commission in such an undertaking. (See para. 33 below.)

Sealing Materials Advisory Panel (SMAP) (Chairman Mr. C. K. Latty)

20. This Panel has met twice during the period and has been discussing a labelling policy for Sealing Materials products. A report to the Executive Committee will be prepared.

Textile Advisory Panel (TAP) (Chairman Mr. J.H. Marsh)

21. This Panel is producing three advisory documents (see para. 67) concerned with manufacture, application and protective equipment.

The EEC Commission - DG III Interests. (Internal Market and Industrial Affairs)

22. A long-standing Council Directive (Directive No. 67/548/EEC of 27 June 1967) which deals with the classifying, packaging and labelling of dangerous substances has recently been amended for the sixth time. Among the amendments a new class of substances "carcinogens" has been added to the Directive's classification list but an appropriate carcinogen label has yet to be agreed.

23. Over 1000 dangerous substances have so far been categorised into 14 different classifications such as "toxic", "inflammable", "explosive", etc.; asbestos however is not yet listed. We presume that asbestos fibre (but not asbestos-containing articles) will eventually be classified, possibly as a "carcinogen", but asbestos is clearly not proving easy to categorise.

24. A related Council Directive (Directive No. 76/769/EEC of 27 July 1976) (which stems from Directive No. 67/548/EEC) is one which governs the movement of Dangerous Substances between EEC member countries. This Directive is about to be amended for the fifth time by a proposed Directive which would allow various types of asbestos to be used in certain ways.

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25. As the draft now stands there are different restrictions on the use of crocidolite and on other types of fibre. However, these restrictions allow the main uses of all types of asbestos. Nevertheless, the directive differentiates between crocidolite and other types of fibre and this is proving to be a difficulty since France and Germany do not so differentiate in their national legislation. The draft is now at COREPER level and at a recent meeting on 25 June Denmark vetoed the draft as being too lenient towards crocidolite and Germany vetoed it because it was too strict. In the voting, six countries opposed the form of words dealing with crocidolite, while France, Germany and Italy were in favour. The next discussions re-open in September.

26. The Scientific Committee on Food (SCF) (a very prestigious body of distinguished EEC scientists) has issued a report which states that there is no proof that there is any danger to health in the use of filters for food and drink or in the use of a/c pipes for drinking water. Unfortunately the report then goes on to suggest that it might be prudent to try and use substitutes. This is not very helpful to us.

27. The report is entitled "Reports of the Scientific Committee for Food - Ninth Series 1979". Reference 15 BN 92-825-1638-5. Catalogue number CB-NW-79-009-EN-C. It is printed in all the main languages and if a copy is required the AIA EAC offices in Brussels can help you.

The EEC Commission - DGV Interests (Social Affairs)

28. The Directive on the Protection of Workers from Harmful Exposure to Chemical, Physical and Biological Agents at Work (the "Framework" Directive) was adopted by the Council in June and should be published in the autumn. The Directive now includes a provision allowing national legislation to be more stringent than the EEC's. The industry had been consulted during earlier drafting and the Directive is not in conflict with our interests.

29. Following from this "framework" Directive there will be nine "daughter" directives, one for each dangerous substance listed and we are of course concerned with the one dealing with asbestos. Various working parties and committees on which we have spokesmen (notably Dr. Bobock) are involved and our views are being taken into account. The plan is for this draft asbestos Directive to be submitted to the Council by early September 1980.

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30. The Directive will cover all aspects of working with asbestos including:- an allowable asbestos dust concentration; a transitional period (5 years) in which to move from 2 f/ml to 1 f/ml; differentiating or not between fibre types; handling of free fibre; health checks; protective clothing; plant cleaning; waste disposal; measuring methods; monitoring frequency; use of substitutes, etc.

31. D.G.V asked the AIA (through Dr. Robock) to contract for a report on dust measurement methods. The task was given to Mr. W.H. Walton a noted dust expert and his interim report has been sent to the Commission. The final report is to be ready by mid-September 1980.

32. We understand that in the autumn, DGV are likely to start drafting a new directive which was to have been called "Carcinogens at the Work Place" but which may now be called "Specially Dangerous Substances at the Work Place". This will allow for the control of other dangerous substances besides carcinogens (such as tetrogens and some others which are highly toxic).

The EEC Commission - DGXII Interests (Research)

33. The DGXII directorate has funds available for research work on asbestos and we have been asked to suggest topics for research. One which we would like to suggest to the EEC Commission is an investigation by electron microscope into lung burden (see para. 19 above). In the first instance a meeting with certain scientists sponsored by the EEC is needed, then we would hope to broaden the scope world-wide. However, at present we cannot persuade the EEC to move on this matter.

The EEC Commission - SEPC Interests (Environment and the Consumer)

34. The effect of emissions from factories into air and water is becoming of more and more interest to the EEC and the AIA is helping them to gather information for the formulation of a directive. The investigation is being handled by T.N.O. (Toegedast Nederlands Onderzockscentrum) the Dutch research establishment who have sent a questionnaire to AIA Member Associations in the EEC to be answered by individual firms. Dr. Lenting, in charge of the project, has recently asked if Greece and Spain (being prospective EEC members) could join in; this has been agreed.

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EEC - The European Parliament (E.P.)

35. The proposed Directive which deals with the movement of asbestos between EEC member countries (see paras. 24 and 25 above) will be passed to the E.P. for its opinion. The matter will be dealt with by Parliamentary Committee No.11 (Environment, Public Health & Consumer Protection) and it is important that each Association in the EEC countries makes contact with its own members of the European Parliament who have an understanding of the industrial position and particularly with members of Committee No.11. The AIA Brussels office has written to all concerned about this and we emphasise again that the industry point of view should be put to E.P. members before the matter comes up in Parliament. Mr. van der Rest and Mr. Vanherle have already met the Chairman of Committee No.11 at Strasbourg; the Committee restarts its meetings on 22 September 1980.

EEC - The Economic & Social Committee (E.S.C.)

36. Following from para. 35 the same proposed Directive has already been passed to the ESC for their opinion. Here the matter is being considered by the Section which deals with "The Environment - Public Health and Consumer Protection".

37. A working group has already been formed by this Section and through our Brussels office we have been co-ordinating the appointment of an "expert" (Dr. Gaze) to advise the Group I (industry) members of the Working Group and of "advisers" (Mr. Bouige and Mr. Vanherle) for individual industry members of the Working Group. Two meetings of the Working Group have been held so far and a preliminary draft opinion has been published which amongst other matters recommends that the use of crocidolite should be limited to a/c pipes larger than 1500 mm diameter. We are strongly opposing this.

Inter-Management's Report on Asbestos and the EEC (The Riedl Report)

38. A closely argued report on asbestos and the EEC by Inter-Management (The Riedl Report) has been distributed to members of the Executive Committee and to member associates in the EEC (i.e. to EAC members). This report which has just been received by the Executive Committee supports the advice given in AIA Memorandum 3/79 (dated 31 October 1979) and repeated regularly by the Secretary to the EAC - which is the importance of our National Associations in EEC countries getting to know personally their own countries' representatives involved in the EEC Institutions (Coreper; E.P.; ESC; and the Commission) and keeping them well informed of our viewpoint.

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39. The Riedl Report also endorses close co-operation with UNICE * and CEFIC.+ (AIA has been a member of UNICE for over two years and has had useful connections with CEFIC through the Brussels office.) The report also recommends that the industry should make a particular effort through national industrialists to inform European M.P.'s about the asbestos industry and that industrialists should do this by going to Strasbourg during sessions of the European Parliament and by meeting members there informally.

NATO Scientific Committee

40. We learned that the Scientific Committee of NATO had become interested in asbestos and had asked T.N.O. (see para. 34 above) to initiate a study with a view to possible research funded by NATO. We made contact with the TNO investigator concerned (Mr. Formerod) and are now involved in the early stages of planning the exploratory study.

Labelling

41. The AIA "a" logo is now used on all bags of fibre coming from our most important mines. We have also been in consultation with Rhodesia, Russia and Yugoslavia to see if they also will use the "a" logo. Cyprus, although not a member of the AIA, has agreed to use the logo after present bag stocks are used up.

42. The logo is being used on more and more products and it is to be hoped that the "a" symbol will become known and accepted by governments as well as by the general public. Consumer lobbies around the world are increasingly insisting that what is on sale must be properly described and readily recognisable. We should keep moving with this tide; whether we do so or not lies in the hands of our members and it is a matter of regret that a number of these appear to have misinterpreted the position (echoed by a recent asbestos industry report which referred to labelling as "discriminatory"). Labelling has come to stay and the asbestos industry can be no exception.

43. A draft schedule has been drawn up incorporating details of the asbestos labelling/logo used in member countries. This will be distributed soon for comment and the incorporation of amendments, suggestions, etc. It will then be sent out in final form and updated as necessary thereafter.

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* Union of European Community Industries.

\+ European Council of Chemical Manufacturers Federation.

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Waste

44. The AIA advisory publication on Waste Disposal (RCP 3) was published in August 1979. (See para. 66 below.) The EEC Council Directive No. 78/319/EEC of 20 March 1978 on "Waste Disposal for Dangerous Substances" has now run its two year course and Common Market countries can expect their national authorities to enforce the requirements in the Directive if they have not done so already.

45. There has been questioning in some countries of the dust counts at waste disposal sites and Member Associations should remind company members concerned to take regular dust counts of their waste disposal areas so as to be able (if necessary) to prove their safety to local authorities.

Membership

46. Since the last D.G.'s notes were written, Israel's application to become a member has been agreed by the Governing Council and Nigeria's application will go before the next Governing Council meeting. India has formed a National Association with the intention of joining the AIA and Mexico and Yugoslavia are in the process of discussing the formation of National Associations. Argentina, Brazil and Korea have been in correspondence on this subject.

Conferences

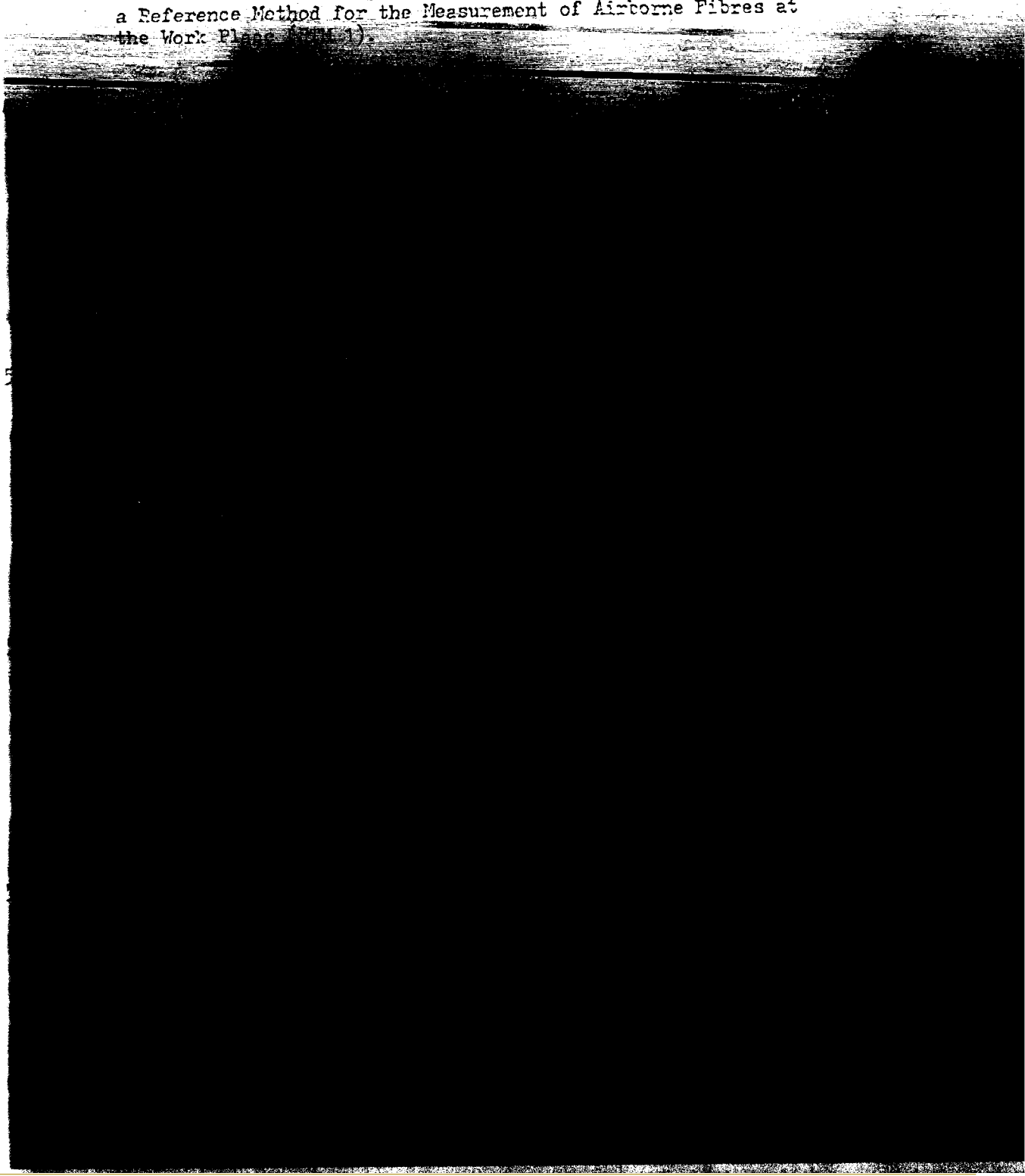
IARC Conference on the Biological Effects of Mineral Fibres held at Lyon on 25/27 September 1979

47. Close to 300 eminent scientists from 26 countries gathered at Lyon - the conference was organised by the International Agency for Research on Cancer (IARC) in cooperation with the Institut de la Sante et de la Recherche sur le Cancer and the UK Medical Research Council's Pneumoconiosis Unit. This was intended to be a joint asbestos/MMMF symposium but most of the papers presented were on asbestos because few MMMF research projects had been completed.

48. Nothing very new was discussed; perhaps this was due to the fact that most available data refer to exposures experienced 20-30 years ago. We of course urgently need health data on the effects of current low dust levels. However, the climate of

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opinion was reasonable although there was a hardening of attitude against amosite; nevertheless, the industry had enough representation to ensure that there was a balanced attitude. Dr. Bobock produced the AIA advisory document on a Reference Method for the Measurement of Airborne Fibres at the Work Place (item 1).



53. The Colloquium was hosted by the Chambre Syndicale de l'Amiante (CSA) of France (President Mr. Cyril Latty) and covered many aspects of dust measuring techniques and strategy. These included progress and experience with the Reference Method; electron microscopes; ambient air measurements; and automatic counting equipment. The proceedings will be distributed in due course and the next Colloquium will probably be in the Spring of 1981.

Other Conferences

54. The Medical Advisory Panel (MAP) advise the Executive Committee on future conferences which deal with asbestos and health. The MAP also try and ensure that there is an AIA representative present if the conference is of sufficient importance and they further advise if it is considered that papers should be read.

55. The list of conferences is regularly up-dated and circulated to Member Associations. The following are of particular interest:-

1. "International Symposium on Water Distribution Systems and Related Health Problems" - Amsterdam 27/29 August 1980.

2. "Fifth International Symposium on Inhaled Particles 1980" (British Occupational Hygiene Society) Cardiff 8/12 September 1980. (The 2nd AIA Scientific Advisory Panel Meeting will take place at Cardiff on the evening of 9 September 1980.)

3. "Epidemiological, Immunological, Genetical Aspects of Asbestosis" Wroclaw, Poland, March 1981. (The Executive Committee has decided that the AIA should be represented at this Conference.)

4. "International Symposium on the Prevention of Occupational Cancer" (ILO/WHO/IARC) Helsinki, 21/24 April 1981.

5. AIA Biennial Conference, London 26/29 May 1981.

6. World Conference on "Asbestos-Health & Society". (IRDA, Canadian Government & AIA) Montreal - 1981. (See para. 51 above.)

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Questionnaire on Low Dose Areas

56. The questionnaire to find out where we might make a low-dose investigation (see paras. 16/17 above) has had a disappointing response. This is probably because the object of the questionnaire was not stated clearly enough and also because there is insufficient knowledge of the dust levels that existed in the past.

57. The purpose was to give the Executive Committee information on where it might be worthwhile to conduct a research project. In the event most members who were sent the questionnaire made the decision themselves "no research project here" by not returning the question forms. I thank those who did, but understand the reasoning of those who did not.

58. We have, however, had some information as follows:-

1. Ten (10) plants (out of a possible 1000 + plants) sent in replies of which two (2) look as if they may have potential but data needs to accumulate for some years yet.

2. Three (3) companies reported that they have low dose investigations going on in their various plants. They could not say when those projects would be finished.

Radiographic Investigation

59. The disappointing response to the AIA questionnaire was discussed with the Chairman of the Scientific Advisory Panel (SciP), Dr. Gilson, and with one of the panel members, Professor Hans Weill, who was in the U.K. on a visiting professorship.

60. Both considered that the AIA with its universal membership including many technically very advanced companies had the capability of providing X-ray health data about its work force which, if properly presented, could be most convincing evidence to show to world scientific opinion. What was more, this evidence was immediately available; time would not be spent in having to set up an epidemiological study - the problem of course would be in evaluating the radiograph readings which were available; but this is purely a mechanical problem.

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61. The readings could well show initially that the state of health of the asbestos industry's workforce world-wide was much better than our critics have suggested; and if readings were taken at suitable intervals thereafter a trend should become evident which would indicate that better conditions were producing healthier work people. Furthermore (as with the U.K. Coal Board findings on a similar scheme concerning pneumoconiosis) the incidence of asbestosis would be seen to be decreasing rapidly in the lower age groups.

62. The Governing Council agreed to a pilot investigatory scheme being launched. This consisted of a short questionnaire which was sent out to Member Associations to find out whether there were in fact enough plants around the world which had X-ray information on their workers to make the scheme worthwhile. We are awaiting the response to this questionnaire; so far 48 plants have replied from 11 countries.

The American Conference of Government Industrial Hygienists (ACGIH)

63. The American Conference of Government Industrial Hygienists has stated that they will recommend in their annual booklet to be published in September, that standards for asbestos at the work place should be as follows:- Chrysotile 2 f/ml; Amosite 0.5 f/ml; Crocidolite 0.2 f/ml. AIA has written to the secretary of the ACGIH to protest that such a standard would virtually ban the use of Amosite and Crocidolite.

64. The ACGIH Committee on TLVs was put in touch with Dr. Robock some months ago and hopefully he and the EMAP may be able to persuade ACGIH to think again.

U.I.C.C./I.L.O. X-ray Film Classification

65. The MAP have reported that a revised standard set of films has been produced for the ILO 1979 International Classification of Pneumoconiosis. The set can be obtained from:-

ILO Publications,
International Labour Office,
CH-1211 GENEVA 22
(Switzerland)

at a cost of Swiss Francs 400 per set.

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AIA Advisory Documents

66. The following documents, Recommended Control Procedure (RCP), and Recommended Technical Method (RTM), are available:-

1. RCP 1 The Control of Asbestos Dust (also available in Italian).
2. RCP 2 Asbestos Cement Products (also available in Italian).
3. RCP 3 Asbestos Waste Disposal (also available in Italian).
4. RCP 4 Asbestos Fibre Handling (also available in Italian).
5. RTM 1 Reference Method for Measuring Asbestos Fibres at the Workplace (also available in Italian and being translated into French and Spanish).

67. The following are at various stages approaching the printing stage and are listed in probable order of availability:-

1. On-site a/c tools (to become an insert to RCP2) (being translated into Italian).
2. Bag-opening.
3. Friction Materials - manufacture.
4. Friction Materials - maintenance work.
5. Textiles- manufacture.
6. Textiles - Manufacture of user articles.
7. Protective clothing.
8. Demolition and Stripping.

68. In addition two leaflets are available:-

1. The Industry's Viewpoint Concerning Asbestos.
2. A Digest of Information Concerning the Association.

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69. A background position paper "Asbestos and Health in the Friction Material Industry" is in draft form.

Useful Papers and Reports

70. Amongst the very many papers which are published the following show certain positive aspects and have appeared within the last 12 months. Details have been previously circulated to members.

1. "CEC - Report of the Scientific Committee for Food, 9th Series, 1979" (Asbestos - page 11) (see also paras. 26 & 27 above).

2. "Environment Pollution by Asbestos Fibres". Study by TNO (Dutch Research Institute) - Mr. Lanting.

3. "The Health Hazards of Asbestos", M. Neuberger (Sichere Arbeit, No.3, 17-21, 1979).

4. "Study of wear on asbestos cement products" (Institut fur Umweltschutz und Emissionsfragen and the Montanuniversitat in Leoben).

5. "Airborne Levels of Asbestos Fibres in General Occupancy Buildings and an Estimate of Carcinogenic Risk" (James T. Schirripa, Industrial Hygienics Inc., Huntington, N.Y.).

6. "FC Drinking Water Pipes - Incidence and Evaluation of Asbestos Fibres in Drinking Water". (Anianthus Centre. Compact - Information - Pipes, 80-1,May 1980.)

7. "An Investigation of the Use of Asbestos Cement Pipe for Public Water Supply and the Incidence of Gastrointestinal Cancer in Connecticut 1935-1973". (Harrington, Craun, Meigs, Landrigan, Flannery & Woodhull - American Journal of Epidemiology, Vol. 107, No.2).

8. "Asbestos Cement Pipe and Cancer in Connecticut, 1955-1974" (Meigs, Walter, Heston, Millette, Craun, Woodhull & Flannery - Journal of Environmental Health, January/February 1980).

9. "Is there a risk to health in using asbestos-cement pipes for the carriage of drinking water?". (S.F. McCullagh, 1980 - Ann. Occup. Hyg. Vol.23, p.189).

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10. "A Rational View of Cancer in New Jersey" (Dr. H.B. Demopoulos when Director of the Cancer Institute of New Jersey).

11. "Environmentally Induced Cancer ... Separating Truth from Myth" (Dr. H.B. Demopoulos - talk to Synthetic Organic Chemical Manufacturing Association Inc.).

12. "Cancer in Modern Mortality" (Publication of the U.K. Chemical Industries Association).

13. "The Prevention of Occupational Cancer: an ASTMS Policy Document - A Review by Dr. J. Keir Howard" (U.K. Chemical Industries Association Background Paper, 20 June 1980).

71. The following paragraphs cover those countries in which there has been significant activity. Legislation is only reported where some amplification is needed of the consolidated schedule circulated under AIA Memorandum ref. AIA/12/REG dated June 1980. Details of events in all associate countries as reported by members are shown at the Annex to Governing Council Minutes.

Australia

72. A small sub-committee within SPAA has been set up to consider ways of countering union pressure against asbestos.

Austria

73. A meeting to discuss the problem of fine asbestos dust was held at Vocklabruck at the end of 1979. It was attended by government officials, scientific and factory doctors, scientists and engineers. Details are awaited.

Belgium

74. There has been a tightening up of the regulations concerning raw fibre and its handling. Government permission now has to be obtained to import and use raw fibre and plants so doing are inspected for standards. If the standards are adequate there is no problem. The regulations concerning finished products are reasonable and acceptable to industry.

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Canada

75. In December 1979 the Canadian Government sent a deputation of officials, scientists and doctors to Washington to protest at the

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unnecessarily stringent rules concerning asbestos and its use which were being proposed by the U.S. regulatory authorities. The Canadian deputation discussed the problem with OSHA, EPA and CPSC officials and explained Canadian concern.

76. A tripartite group (government/industry/workers) from Germany is being invited by the Canadian government for talks and a visit to an asbestos mine. A French group was invited by the Quebec government in December 1979 for a similar purpose and this party included Messrs. Latty and Join and Professor Bignon.

77. Dr. Dunnigan has been appointed Director General of the Institute for the Research and Development of Asbestos (IRDA) in February 1980. He had been Director of the asbestos research programme at Sherbrooke University and IRDA's headquarters will be on the university campus.

78. The Chairman of the IRDA Board of Directors is Mr. Michael Prus, Chairman and President of Carey Canadian Inc.. The other six members of the Board (3 industry and 3 government) are:- Marcel Dorais, President of Les Mines d'Amiante Bell Ltée; J.R.M. Hutcheson, Chairman of Johns-Manville Canada Inc.; André Marier, President and G.M. of Centre de Recherche Industrielle de Quebec; M.J. Messel, President of Lac d'Amiante du Quebec Ltée; Daniel Perlstein, President of Societe National de l'Amiante; André Saumier, Senior Advisor, Richardson Securities of Canada. The Institute's main objectives are:-

1. The development of new asbestos-based products.

2. The measurement of the amount of fibre emission into the environment caused by asbestos-based products.

3. Research into the elimination of any such emissions.

79. All aspects of health research will continue to be the responsibility of IOEH whose budget for 1980 is Canadian $ 810,700 (funded by fibre producers). Since it started in 1966, IOEH has spent Canadian $ 6,195,400 and published 149 papers on matters to do with research into asbestos and health.

80. A Royal Commission will sit in Ontario in September 1980 to report on asbestos - the hearings are expected to last for a year and QAMA are preparing to play a part.

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Denmark

81. The list of asbestos-containing products allowed by Danish law is as follows:-

1.	Unbonded Packing Materials	until 1 April 1982
2.	A/C Products (max. 20% asbestos by weight)	until 1 January 1985
3.	Commutators (max. 60% asbestos by weight)	until 1 January 1990
4.	Friction Facings (maximum 20% asbestos by weight)	no date limit
5.	Bonded Packing Materials (max. 20% asbestos by weight)	no date limit
6.	Linings (max. 20% asbestos by weight)	no date limit

82. It is most important that the asbestos industry should be able to convince world scientific opinion that there is an acceptable level of risk for asbestos dust. If we can do this then perhaps the political (not scientific) decision in Denmark to ban asbestos products "unless zero risk from cancer can be proved" might be changed.

83. It is impossible to have a zero risk from anything and most scientists lean to the straight line relationship between a carcinogen and its cancer rate. It is everyone's common experience that some risk in all our activities is a part of living and since asbestos can be no exception to this natural law, it ought to be possible to convince the Danish authorities that by asking for a zero risk level from asbestos they are: (a) asking the impossible; (b) being discriminatory in doing so.

France

84. A recent decision by the Minister for Health to ban the use of asbestos filters for food and drink was the subject of a protest by the Chambre Syndicale de l'Amiante (CSA), our French Association. This is not a scientific decision since scientists maintain that an asbestos filter is the most efficient. The EEC's Scientific Committee on Food have stated this (see paras.26/27

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above) and the German Government Health Department have recently excepted asbestos filters from a ban which they have put on some other articles (see para. 92.2.2. below). The French Health Department is also investigating the use of asbestos in certain household articles with a view to limiting their use.

85. Dr. Eulah Bingham held an informal meeting in Paris on 27 June 1980 with government representatives, certain doctors including Professor Bignon and Dr. Sebastien and one industry representative, Mr. Bouige. A report of this meeting was circulated to Member Associations (ref. AIA/1/4/8/POL dated 14 July 1980). Dr. Bingham was not very helpful in her comments on the asbestos situation in the U.S.A.

86. The Minister for Health has indicated that the government would be prepared to reduce the exposure level to 1 f/ml if the EEC agreed on this figure. There was no intention of going to any lower figure.

Germany

87. The year has been an eventful one for the asbestos industry, one of the main aspects being the German Government's concern with legislation to improve conditions at the workplace. This has been largely due to Trades Union pressures.

88. Raw Material Regulation

88.1 Discussions have taken place on a draft which modifies the laws governing the handling of all dangerous raw materials in the workplace (in ratification of ILO Convention No.139). These materials are classified as:-

(a) highly dangerous;

(b) dangerous;

(c) less dangerous.

Asbestos is classed as dangerous.

88.2 After negotiations involving the political parties, the trades unions and the Ministries of Economic Affairs and of Labour, the current draft regulation concerning asbestos includes the following:-

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(a) various limitations to be imposed on working time if the TLV is above a certain level (still to be laid down - but possibly 1 f/ml);

(b) asbestos-containing products to be accompanied by label instructions referring to the Raw-Material Regulation;

(c) reasons for using asbestos products instead of substitutes to be stated to the local labour authority.

89. Chemical Regulation

After much discussion, asbestos does not have to be included under a new modification of this law which would have been very burdensome to the industry.

90. Industrial Catastrophe Regulation

Again after much discussion, the asbestos-processing industry will not be included under this Regulation. However the Asbestos Corporation at Nordenham will be included because of its large stocks of raw asbestos.

91. Asbestos Cement Law

A year ago the Hamburg Senate recommended that asbestos-cement products should no longer be used in public and multi-storied buildings and in underground construction if other materials were available. The Senate may well try and influence the other ten (10) Federal States in Germany which would not be a good development.

92. Industrial Safety Regulation (Dust) - Second Amendment

92.1 The Federation of Industrial Accident Insurance and Industrial Safety Corporations (Berufsgenoschenshaften (BG)) is able to formulate accident prevention regulations which may ultimately be passed as laws. The BG recently passed a second amendment to the Industrial Safety Regulation (Dust). This details certain protective measures to be taken while processing asbestos, which are acceptable to industry.

92.2 In addition the second amendment published a list of asbestos products which are banned. These were:-

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1. Insulating materials used for accoustic reasons, for heat/cold protection and for use against damp.

2. Filters (except for liquids and the pharmaceutical industry).

3. Paints, putties and adhesives using asbestos as an additive.

4. Mortar and surface fillers using asbestos.

5. Floor covering (this means vinyl underlay for carpets) and road surface materials which incorporate asbestos.

92.3 However, the above can be used without restriction if they can pass a special BG test for dust emission in use (to be less than 0.5 f/ml).

93. Special Meeting

The BG Supervisory Board organised a special meeting on 6/7 March 1980 to discuss asbestos. There were 700-800 participants and with three individual exceptions the tone of the meeting was positive and helpful, and the press and other media did not distort their subsequent reports.

94. The Media

Because of increased coverage of asbestos and health matters in the media much effort has been spent by industry to get in touch with editors and TV directors. This has resulted in a more balanced coverage.

95. The Asbestos Institute, Neuss

The Asbestos Institute for Occupational and Environmental Safety and Health held a press conference on their first anniversary in January 1980. The Institute's Chief Executive, Dr. Klaus Robock, presided and the scientific technical panel (the Scientific Working Group on Asbestos) with Dr. Bohlig as Chairman also attended. The object was to give the true facts about asbestos to selected journalists interested in asbestos.

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96. Federal Environmental Protection Agency (Umweltbundesamt)

This Agency has recently directed all its activities (research programmes etc.) to assessing what danger to the environment is posed by asbestos.

97. Use of f/litre

Those German ministries concerned with asbestos are now using the f/litre scale and not f/ml.

Netherlands

98. A new regulation has banned asbestos in household articles (irons/toasters).

99. A Tripartite Committee has been set up to advise the government on asbestos matters. It consists of employers, experts, and trades union members. One of the members from industry is Mr. E. Goedmann.

100. A recent television programme on factories and the environment had shown the Goor Eternit factory as an example of excellence.

U.K.

101. The Advisory Committee on Asbestos (ACA) popularly known as the Simpson Committee (after its Chairman) issued its recommendations in December 1979. These have been fully reported elsewhere; among the total of 41 recommendations most of them are, with some reservations, acceptable to U.K. industry. Two main exceptions are a 0.5 f/ml level for amosite and a ban on crocidolite. The ACA recommendations are being discussed at present and it appears that final decisions and hence legislation will be delayed for some considerable time yet.

102. A (draft) Code of Practice and Guidance Note under the Health and Safety at Work Act is about to be issued. It covers work with asbestos insulation and with asbestos coatings and deals with personal protection, plant and process control and asbestos waste and has industry's full support.

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U.S.A.

103. Certain regulatory agencies in the U.S., notably the Occupational Safety and Health Administration (OSHA); the Environmental Protection Agency (EPA) and the Consumer Product Safety Commission (CPSC) have shown by their combined actions that they are aiming for legislation concerning asbestos which would effectively stop its use.

104. AIA/NA have successfully queried EPA's water quality criteria document resulting in this being delayed indefinitely. In addition OSHA is considering AIA/NA's suggestion of a model standard for the regulation of the construction industry. But in other areas AIA/NA has not been able to persuade government officials to adopt a practical and realistic approach to the problem and this difficulty has been aggravated by the attitude of organised labour and of public interest groups. Thus AIA/NA decided to retain a law firm to advise them on:-

(a) Rule-making processes.

(b) Possible future legislation.

105. The Advance Notices of Proposed Rulemaking (ANPR) which were issued by EPA and CPSC in 1979 were strongly argued against by AIA/NA within the deadline set for response (18 February 1980). The AIA/NA document sent to EPA consisted of 55 pages and that to CPSC was similar. The nub of the arguments in both cases was that unreasonable risk had to be proved before government could propose any regulation under the Toxic Substances Control Act (TSCA).

106. Members may be interested to know that the law firm retained by AIA/NA had been earlier retained by the U.S. Chemical Industry who were contesting an OSHA-imposed workplace standard for benzene ten times more stringent than was considered necessary. This case has just been won by the Chemical Industry and it is now up to OSHA to prove that the hitherto accepted benzene standard is harmful and to prove at what level any new OSHA standard should be set.

107. This decision is bound to have a far-reaching impact on all U.S. Government programmes to control carcinogens and, for example, will have a bearing on OSHA's stated intention of reducing the

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present 2 fibre/ml workplace standard for asbestos. If the new precedent is followed, OSHA will have to prove: (a) that 2 f/ml is unhealthy; (b) what is a healthy lower level.

108. OSHA has announced that action is to be started on asbestos rule-making during 1980. The standard to be proposed may follow recent recommendations to OSHA which were made by a research institute (the Research Triangle Institute) (RTI) which suggested that it was possible to manufacture at the following exposure levels:-

Most products (except dry woven textiles)	0.2 f/ml
Automotive after-market	0.2 f/ml
Shipbuilding	0.5 f/ml
Secondary fabricators	0.5 f/ml
Construction (except for removal, maintenance and demolition)	0.5 f/ml
Ship repair	2.0 f/ml.

109. Whether OSHA accepts these levels as practical for rule-making remains to be seen. The time-table for expected OSHA legislatory initiatives is roughly as follows:-

Advance Notice of Proposed Rule-Making (ANPR)	- July/August 1980
Proposed Rule	- Sept./October 1980
Public Hearings	- Feb./March 1981 (?)
Final Rule	- May/June 1981

110. The EPA has announced that a limitation or ban on non-essential commercial and industrial uses of asbestos would be considered but such action depended on showing an unreasonable risk with asbestos, the reliability of the substitute and the economic consequences of banning. EPA recognises that in order to minimise the impact on industry the timing of any effective dates could range from 1985 to 1995 and possibly later, resulting from any judicial appeal.

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111. The time-table for expected EPA legislatory initiatives following their ANPR is approximately:

ANPR was published	October 1979
Proposed Rule	December 1980 (?)
Public Hearings	(?) 1981
Final Rule	(?) 1982

112. AIA/NA's lawyers need to assemble as much information as possible in order to prepare their case and a list of AIA/NA's requirements toward this end is shown in summary form as an Annex to this letter. The information asked for has been sent, or is being prepared to be sent, by many Member Associations around the world direct to AIA/NA.

113. However, if you have not already been contacted by this office to forward information to AIA/NA and if you feel that you may have information which could be useful to them, please send the data directly to AIA/NA (plus copy to this office, please).

AIA/41/NEWS August 1980

Attachment: "Summary of Information Needs for United States Regulatory Proceedings".

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Attachment to
AIA NOTES FOR ASSOCIATIONS
JULY 1980

SUMMARY OF INFORMATION NEEDS FOR UNITED STATES REGULATORY PROCEEDINGS

1. Historical data indicating whether or not the amount of asbestos in the general environment increases to any significant extent from man's use of asbestos.

2. Studies of the eventual fate of once-released asbestos fibers.

3. Studies of the accuracy and validity of measurements made by the membrane filter method, especially at levels below .5 fibers/cc.

4. Critiques of present sampling methods, reviews of their relative strength or weaknesses, evaluations of conversions among various measurement techniques, and determinations of the relative sensitivity of past and present measurement methods.

5. Medical evidence from individual asbestos companies, especially if unpublished, of the health effects observed in their employees.

6. Medical critiques of the dose/response relationship of asbestos and health, variances of effects among fiber types, the effect of smoking, and risk assessments for asbestos at low levels of exposure.

7. Documented historical information of the levels of asbestos exposure among asbestos employees, especially at plants where epidemiology studies have been conducted.

8. Current asbestos exposure levels at all stages of the mining, milling and manufacturing process and during product installation and use.

9. Descriptions of historical efforts to reduce worker exposure, indicating costs incurred, methods used, degree of success in achieving reductions, and the limitations on any further reductions.

10. Analyses of the economic availability, efficiency and medical effect trade-offs inherent in various suggested substitutes for asbestos or asbestos-containing products.

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