

April 22, 2016

The Honourable MaryAnn Mihychuk, P.C., M.P.
Minister of Employment, Workforce Development and Labour
House of Commons
Ottawa, Ontario
K1A 0A6

Dear Minister:

On behalf of the 360,000 workers the National Union of Public and General Employees represents and the thousands of workers whom have died due to asbestos-related diseases, I would like to emphasize the urgency of taking action on asbestos. After years of inaction, Canada now has the opportunity to once again base public policy on scientific evidence, protecting both worker and public health by initiating a comprehensive ban on asbestos.

To this day, every year, 145,000 Canadian workers are exposed to asbestos at their workplace, and tragically, over 2,000 are diagnosed with often fatal asbestos cancers and other diseases.

Yet Canada continues to allow the import and use of asbestos without any comprehensive strategy to phase out asbestos or to promote safe substitutes. Previous governments have refused to ban asbestos, sullyng Canada's international reputation by ignoring scientific and technical information.

We have high hopes your government will announce its intent, if not table a comprehensive ban of asbestos, prior to the summer recess.

More specifically, we would like to recommend:

1. **Pass legislation officially banning the use, export and import of asbestos.** Such legislation has been passed in 56 other countries, including the United Kingdom, France, Germany, Japan and South Korea and many other Canadian trade partners.
2. **Establish an expert panel on banning asbestos.** Some aspects of a comprehensive ban of asbestos are less straightforward and could be studied by an expert panel on asbestos, which would include labour, legal, health, environmental and other experts. The purview of this parliamentary expert panel could include the challenges related to stockpiles, provincial-territorial licensing and trades registration for asbestos removal, disposal issues, as well as the appalling friable asbestos in First Nations' housing.

3. **Substitute for safe alternatives.** According to Statistics Canada, imports of asbestos-related items have been steadily increasing from \$4.7 million in 2011 to \$8.2 million in 2015. The bulk of these goods consisted of replacement asbestos brake linings and pads while other imports included raw asbestos, friction materials, pipes and tiles. Alternative asbestos-free brake pads are already manufactured in Guelph, Ontario. This means that substituting for safe alternatives will also create Canadian jobs.
4. **Support a pan-Canadian registry of asbestos exposure locations and asbestos diseases.** This would involve working with provincial and territorial Premiers and First Nations on establishing a pan-Canadian asbestos strategy, including both an asbestos disease registry as well as a public building registry.
5. **Support a comprehensive health response to asbestos diseases.** This will involve working with the provinces and territories to support the early detection and effective treatment of asbestos diseases, especially mesothelioma, the terrible cancer caused predominantly by asbestos. This would include medical monitoring of the workers currently exposed to asbestos, including those in the asbestos-remediation trade.
6. **Provide support for the transition of affected businesses, workers and communities.** We need to ensure those who have been making asbestos products have support for the transition process.
7. **Commit to a leadership role at the Rotterdam Convention.** Canada should support, if not advocate, for the addition of chrysotile asbestos to the Prior Informed Consent (PIC) list of hazardous chemicals and pesticides under the Rotterdam Convention.
8. **Remove the exclusions for asbestos-containing materials in WHMIS 2015 (GHS).** Asbestos-containing products, like brake pads, are excluded from Canada's implementation of the Globally Harmonized System of Classification and Labelling of Chemicals (GHS). Excluding asbestos from the scope of GHS (WHMIS 2015) is unconscionable, especially now that other jurisdictions implementing the same globally harmonized system, such as the U.S. and European Commission, have included consumer products which contain asbestos.
9. **Prohibit the use of asbestos-containing materials in federally-funded infrastructure projects.** As is the case for brake pads, the use of asbestos cement pipes is also on the rise in Canada. Substitutes are readily available. It is very important that asbestos cement pipes and other asbestos products not be permitted in federally-funded projects and that the federal government work with the provinces and territories to follow suit.

10. Work with municipalities and provinces on asbestos disposal. Asbestos products in any form (brake pads, pipes or tiles) are eventually cut and processed, producing dust, which may uncontrollably spread to the workplace and broader community. There are also concerns about asbestos disposal in Canadian landfills. Provinces and municipalities need assistance, if not model legislation, to deal with this.

Canada has the opportunity to show the world we care about stopping the tragedy of asbestos, Canada's and the world's biggest occupational killer. We believe the upcoming National Day of Mourning, April 28, offers a tremendous opportunity for you, Minister, to make things right in response to the asbestos epidemic.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'JC', with a horizontal line extending to the right and a vertical line at the end.

James Clancy
National President

cc: NUPGE National Executive Board
Hassan Yussuff, CLC President