

Canadian Embassy



Ambassade du Canada

TOKYO May 6, 2003

The Honourable Chikara Sakaguchi
Minister of Health, Labour and Welfare
Ministry of Health, Labour and Welfare
1-2-2 Kasumigaseki, Chiyoda-ku
Tokyo 100-8916

Dear Minister Sakaguchi,

I would like to take this opportunity to express the Government of Canada's concerns with respect to the possible banning of chrysotile asbestos in Japan.

Canada views Japan as a like-minded country on issues related to worker health and safety and especially concerning the safe use of minerals and metals. If Japan were to prohibit asbestos rather than simply regulating its use, it would be the only country in Asia to have taken such a drastic measure.

We recognize that all forms of asbestos are hazardous substances. To protect workers and the general population against harmful exposure, in 1981, the Government of Canada adopted a controlled-use approach. By "controlled use" we mean an enforcement of appropriate regulations for the safe-handling of asbestos and the rigorous control of exposure to it. Where exposure and subsequent risk cannot be properly controlled, use in those specific cases is prohibited. For example, low-density and friable products (such as sprayed asbestos in buildings) are no longer marketed and are prohibited in Canada under the *Hazardous Products Act*.

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The Government of Canada believes that the current approach to the regulation of asbestos and other hazardous substances (including substitute fibres) in Canada is appropriate to ensure the protection of workers and the general population. We also firmly believe that to use a ban on all forms of asbestos, the most trade-restrictive measure possible to regulate the use of products, is unnecessary to ensure the health and safety of workers.

Canada's view is that it is important to rely upon thorough scientific evidence to guide decisions in matters related to health and safety. The scientific evidence on the asbestos health issue, specifically as it concerns chrysotile, is very comprehensive. The issue has been reviewed by eminent bodies internationally, including the World Health Organization and the International Labour Organization. The same cannot be said of most asbestos substitutes, for which little epidemiological and toxicological research has been published. However, on this matter there is growing evidence suggesting that the main asbestos substitutes should be subject to the same regulations as chrysotile asbestos as recent studies on the biopersistence of chrysotile identify a much lower durability for chrysotile than for the main substitutes indicating its lower toxicity fibre for fibre. Details of this research were presented by the Asbestos Institute at a public hearing chaired by the Chemical Substances Investigation Division of Japan's Ministry of Health Labour and Welfare (MHLW) on April 8, 2003, in Tokyo.

Based on current scientific knowledge and the approach suggested by the organizations noted above, Canada believes that at low-level exposures with controlled use, modern asbestos products do not present undue risk to human health. When in July 1996, the French "Institut national de la santé et de la recherche médicale" (better known as INSERM) published its review of the scientific literature which was used by the French government to announce a ban of asbestos, the Canadian government - as a responsible government - asked for a review of this document by an independent panel of renowned international scientific experts. The report of these experts was unanimous in saying that there was no new scientific evidence that would justify a change of policy on asbestos.

Similarly, in 2002, the United States Environmental Protection Agency (EPA) undertook a review of its risk assessment to take into account improvements in asbestos measurement techniques and improvements in the understanding of how asbestos exposure contributes to disease. I understand that this review is expected to result in a softening of U.S. regulations concerning chrysotile.

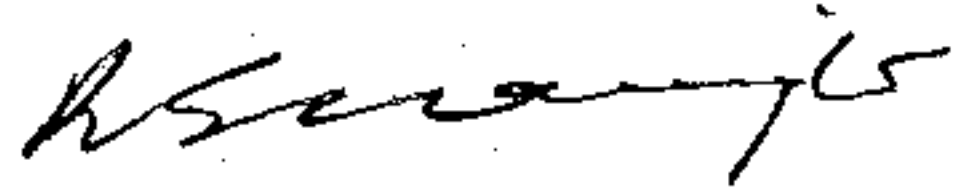
The information provided at the May 8 hearings demonstrates that the controlled use of chrysotile asbestos is a sound approach and we urge you to consider exempting chrysotile cement and friction products from more restrictive regulations.

We would welcome an opportunity for the Canadian government to discuss this further with your officials. In fact, the Asbestos Institute has offered to send a team of scientists to Japan to undertake scientific exchanges on this issue.

Thank you for your attention to this matter.

Please accept the assurances of my highest consideration.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "R. G. Wright". The signature is written in a cursive style with a prominent flourish at the end.

Robert G. Wright
Ambassador