

April 7, 2016

The Right Honourable Justin Trudeau, P.C., M.P.
Prime Minister of Canada
Langevin Block
Ottawa, Ontario
K1A 0A2

Transmission: Original by email

Dear Prime Minister Trudeau:

RE: CELA urges a comprehensive ban on asbestos for Canada

The Canadian Environmental Law Association (CELA) is writing to you to follow-up on our initial letter of November 12, 2015 requesting Canada take all necessary regulatory measures for a comprehensive ban on asbestos in Canada.

CELA is collaborating closely with health, environment and labour organizations in Canada and worldwide in support of efforts to ban asbestos. One of those organizations is Ban Asbestos Canada (BAC), which recently submitted a letter to you urging strong regulatory action for a comprehensive ban on asbestos in Canada. CELA strongly supports the recommendations submitted by BAC to achieve an asbestos ban in Canada.

Recent media coverage on asbestos including “Asbestos-linked cancer on the rise: Statscan”¹ by the Canadian Press and “Union leader calls for national registry to track asbestos” in the Globe and Mail² highlight the urgent need for a ban in Canada. These articles outline the impacts of asbestos exposure to public health, particularly for workers. The latency period for asbestos related diseases such as asbestos related lung cancer and mesothelioma are lengthy and can range between 20-40 years before symptoms develop. According to Statistics Canada, between 1992 and 2012 new cases of mesothelioma increased from 272 to 560.^{3,4}

There is no indication that this trend will abate.

We are very concerned that the current regulatory framework in Canada is wholly inadequate to ensure protection of the public from asbestos use throughout its lifecycle. Past government’s failure to address the adverse impacts of asbestos has contributed to the increase in death rate from asbestos related diseases. Canada’s long history of asbestos mining, use, export and import

¹ Ubelacker, S. “Asbestos-linked cancer on the rise: Statscan.” Published by the Canadian Press, Thursday, Jan. 21, 2016. Accessed at <http://www.theglobeandmail.com/news/national/asbestos-linked-cancer-on-the-rise-statscan/article28306005/>

² Hume, M. “Union leader calls for national registry to track asbestos.” Published in the Globe and Mail, January 21, 2016. Accessed at <http://www.theglobeandmail.com/news/british-columbia/bc-union-leader-calls-for-national-registry-to-track-asbestos/article28333045/>

³ Hume, M. “Union leader calls for national registry to track asbestos.” Published in the Globe and Mail, January 21, 2016. Accessed at <http://www.theglobeandmail.com/news/british-columbia/bc-union-leader-calls-for-national-registry-to-track-asbestos/article28333045/>

⁴ Ubelacker, S. “Asbestos-linked cancer on the rise: Statscan.” Published by the Canadian Press, Thursday, Jan. 21, 2016. Accessed at <http://www.theglobeandmail.com/news/national/asbestos-linked-cancer-on-the-rise-statscan/article28306005/>

must end if we are to fully protect public health, particularly in the workplace. The end of life management of asbestos including the disposal of asbestos containing materials may also pose a risk to public health. According the National Pollutant Release Inventory (NPRI),⁵ Canada's pollutant release inventory, in 2014, 52 facilities across Canada reported a total of 34,173 tonnes of asbestos (friable form) released and transferred for disposal.⁶ The total release and disposal of asbestos (friable form) in Canada, in fact, is underestimated as many facilities in waste treatment and disposal sector may not comply with the reporting requirements under the NPRI.

The government should take a number of immediate steps towards a ban on asbestos. The government has the necessary legal authority to pass regulation to prohibit the use of asbestos in products under the *Canadian Environment Protection Act*. The government should also improve pollution release inventories on asbestos such as the NPRI, which can be achieved by requiring all facilities which release and dispose any asbestos to report under the program.

These measures are essential for a comprehensive ban on asbestos. We are available to meet with you and your staff to discuss how Canada can advance the work to ban asbestos. Thank you for your consideration of our letter. We look forward to your response and the opportunity to work with you on this important initiative.

If you have questions, please do not hesitate to contact Fe de Leon, CELA researcher at 416-960-2284 ext 7223.

Yours truly,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Fe de Leon, MPH
Researcher and Paralegal

c.c. The Honourable Jane Philpott, Minister of Health; The Honourable Catherine McKenna, Minister of Environment and Climate Change

⁵ Note: The National Pollutant Release Inventory is Canada's pollutant registry requiring facilities meeting reporting requirements for over 350 pollutants

⁶ Environment Canada. National Pollutant Release Inventory. http://ec.gc.ca/inrp-npri/donnees-data/index.cfm?do=results&process=true&lang=en&opt_report_year=2014&opt_facility_name=&opt_npri_id=&opt_cas_name=1332-21-4&opt_cas_num=&opt_province=&opt_postal_code=&opt_urban_center=&opt_province_comm=&opt_naics6=&opt_naics3=&opt_naics4=&opt_nai6code=&opt_csic=&opt_media=all&submit=Submit