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CANADIAN ENVIRONMENTAL LAW ASSOCIATION
L'ASSOCIATION CANADIENNE DU DROIT DE L'ENVIRONNEMENT

ASBESTOS: F.A.Q.s

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1. What is Asbestos? 2
2. What are the health risks of asbestos exposure? 2
3. What is a safe level of asbestos exposure? 3
   a. What do the provincial and federal governments deem to be safe exposure levels? 3

What to do if you suspect or discover asbestos? 4
   b. in the workplace? 4
   c. in a school? 4
   d. at home? 4
4. What are current asbestos-testing standards? 5
5. What to do if you have become ill as a result of asbestos exposure? 5
   a. Can I access compensation? 5
   b. Are there provincial or national registries? 5
6. Are there international agreements that regulate asbestos? 6
   c. World Health Organization 6
   d. International Labour Organization 6
   e. United Nations 7
7. Resources - Where to find asbestos regulations? 7
8. How is asbestos regulated in Ontario and Canada? 8
   a. Workplace 8
   b. Import, sale and advertising 9
   c. Production 9
   d. Export 9
   e. Residential 10
   f. Schools 10
9. What is the 'controlled use' approach? 10
10. What law reform is needed in Canada? 10
11. Resources- Where to find more information? 12

1. What is Asbestos?

Asbestos is a fibrous mineral. The principal forms of asbestos are chrysotile (white asbestos) and crocidolite (blue asbestos), other forms are amosite, anthophylite, tremolite and actinolite.

As will be explained throughout this FAQ, asbestos is still used within certain limited and highly regulated products produced and sold in Canada today. However, asbestos was once widely used in building materials due to its strength and resistance to heat and corrosive chemicals. It was, and in some cases (outlined below) still is, used for insulation in buildings and as an ingredient in a number of products, such as roofing shingles, water supply lines, fire blankets, plastic fillers, and medical packing, as well as clutches and brake linings, gaskets and pads for automobiles.

The use of asbestos in Canada was common during the period between 1930 and the early 1980s. However, up until 1990 asbestos was also found in insulation made from the mineral vermiculite, specifically in *Zonolite* insulation, as well as in potting soil. The primary international producer of vermiculate ore, the Libby mine in the US, had discovered asbestos deposits in the vermiculite being mined and manufactured. Since 1990, vermiculite insulation has not contained asbestos. For more information on vermiculite insulation and asbestos, see the following Health Canada webpage: http://www.hc-sc.gc.ca/hl-vs/iyh-vsv/prod/insulation-isolant-eng.php.

2. What are the health risks of asbestos exposure?

Asbestos poses health risks when fibres are present in the air that people breathe. The aging process has caused many asbestos applications to flake and deteriorate, allowing the hazardous fibres to become airborne, at which point the asbestos is referred to as 'friable.' In addition to aging, fibres can be released from asbestos-containing products which have been damaged by water, improper maintenance or removal.

When asbestos dust is breathed in, asbestos fibres become lodged in lung tissues and other internal organs where they remain for life. Over time, they can cause fatal diseases. Breathing even small, invisible quantities of asbestos is known to cause cancer 20 to 30 years after exposure.

Asbestos fibres can cause asbestosis (a scarring of the lungs which makes breathing difficult), mesothelioma (a rare cancer of the lining of the chest or abdominal cavity), lung cancer, and other forms of cancer. Smoking, combined with inhaled asbestos, greatly increases the risk of lung cancer. The link between exposure to asbestos and other types of cancers is less clear. According to the International Agency for Research on Cancer, all forms of asbestos have been classified as Group 1 substances, in other words, "carcinogenic to humans."

Globally, each year, about 125 million people are exposed to asbestos in the workplace. According to the most recent World Health Organization (WHO) estimates, more than 107,000 people die each year from asbestos-related lung cancer, mesothelioma and asbestosis resulting from exposure at work. In Ontario asbestos-related diseases are the number one cause of work-related death for people who have worked in construction.

Exposure in the home can occur with the natural breakdown of asbestos-containing materials, or during home renovations or maintenance work. Exposure in the home can also result from dust being carried home on the clothing of residents who work around asbestos. It is estimated that

worldwide several thousand deaths annually can be attributed to exposure to asbestos in the home.

See answer #11 for a discussion of law reform needed in Canada.

For more information on asbestos-related diseases, see:

- the World Health Organization's fact sheet at: www.who.int/occupational_health/topics/asbestos_documents/en/index.html, and
- Health Canada's fact sheet on the health risks of asbestos at: www.hc-sc.gc.ca/hl-vs/iyh-vsv/environ/asbestos-amiante-eng.php.

3. What is a safe level of asbestos exposure?

No safe level of asbestos exposure has been established. All forms are asbestos are considered carcinogenic (see answer #2).

a. What do the provincial and federal governments deem to be safe exposure levels?

Federal and provincial occupational health and safety legislation, and the Workplace Hazardous Materials Information System (WHMIS), make clear that asbestos is a carcinogenic health hazard, which is strictly regulated in all jurisdictions in Canada.

As noted in Answer #9(b), the federal government has banned the import, sale or advertising of pure asbestos products, or products from which a reasonably foreseeable use could result in asbestos fibres becoming airborne. The federal Ingredient Disclosure List requires that any product containing 0.1% of dry weight asbestos must disclose this information.

In the Province of Ontario, Regulation 278/05 provides that buildings containing, or likely to contain materials with 0.5% or more asbestos by dry weight ('asbestos-containing materials') are subject to strict controls, both for employees and occupants of the buildings. It also provides that new building materials containing 0.1% must be reported on material safety data sheets under the WHMIS.

According to Ontario's Designated Substances Regulation (O.Reg. 490/09) the prescribed legal time-weighted average limit exposure to asbestos is 0.1 f/cc (a) (fibres per cubic centimeter). Under section 16 of this same regulation, employers have a duty to limit employee airborne exposure to asbestos.

In short, asbestos exposure is strictly regulated, particularly during construction or maintenance operations that will disturb asbestos-containing materials used prior to the application of current controls. Despite the existence of these controls on asbestos exposure, it is not fully banned for use in new products.

What to do if you suspect or discover asbestos?

b. in the workplace?

Wherever there is a fibrous material used in a 20 year old or older building, workers should automatically suspect that asbestos may be present. All workers are entitled to know that asbestos is in their workplace. If employees suspect that asbestos fibres may be present in an area, they should ask whether a sample has been sent to a laboratory for testing and identification, they should be shown the results, and if testing has not occurred, they should request that it be done.

The employer is obliged to provide a safe workplace under sections 25 and 26 of the *Occupational Health and Safety Act* of Ontario (OHSA), including training for any workplace hazards (section 25.2.d.).

All workers have the right to refuse unsafe work under section 43 of the OHSA and section 50 prohibits the employer from taking reprisals against workers who refuse unsafe work.

By Ontario regulation any workplace that has or has had asbestos in it, must have an **asbestos management plan** which shows where asbestos is or has been removed, room by room, hallway by hallway, etc. The plan must also provide for annual re-inspections of areas that previously had asbestos-containing material. This information has to be easily available to workers and the public. Asbestos management programs are outlined in section 8 of Ontario Regulation 278/05. The employer is responsible for providing and implementing the plan.

The employer must consult and work with the JHSC (Joint Health and Safety Committee http://www.labour.gov.on.ca/english/hs/pubs/jhsc/jhsc_1.php) on meeting the regulations' criteria. The Ministry of Labour's Occupational Health and Safety Division approves of and enforces the plan.

c. in a school?

The requirements of Ontario Regulation 278/05 also apply to schools. For example, see the Durham District School Board's plan, at: www.esao.on.ca/clients/safety_specific/durham_asbestos/durham_asbestos.pdf.

If parents, teachers, or cleaning staff are concerned about potential asbestos exposure in their school, they should contact their school board and request to see their asbestos management plan.

Regulation 278/05 outlines the required asbestos testing methodology. Schools are required to meet those standards when testing is required under the regulation. Other testing methodology than the types outlined in this regulation are available, but not mandatory, for example: dust wipe sampling.

d. at home?

Homeowners should receive expert advice if they suspect asbestos in their homes and they should not remove it themselves. If asbestos-containing materials are undisturbed and not subject to wear or damage it is often best to leave them alone. If you suspect asbestos in your home, have it analyzed by a qualified professional. Search in the phone book or on-line for experts in "asbestos abatement /removal".

For further information on asbestos in the home, specifically during renovations, see the following CELA Publication: Healthy Retrofits, The Case for Better Integration of Children's

Environmental Health Protection into Energy Efficiency Programs (March 2011), at http://www.cela.ca/publications/healthy-retrofits-full-report.

Also, see the following Playing it Safe fact sheet on asbestos and home renovations: http://www.healthyenvironmentforkids.ca/sites/healthyenvironmentforkids.ca/files/cpche-resources/SafeReno_Asbestos_E_F.pdf.

4. What are current asbestos-testing standards?

Ontario Regulation 278/05 provides for asbestos testing standards.

If asbestos-containing material is present, the owner of the home or facility must inspect that material at regular intervals, at least every 12 months, to ensure that is has not become friable. If it has, the owner is responsible and must either seal or remove the material.

To determine whether a material contains asbestos and to establish its asbestos content and type, testing must be in accordance with the U.S. Environmental Protection Agency, Test Method EPA/600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials, June 1993. (O.Reg.278/05, s.3(1)). This mandated test method is an air sampling method. Dust sampling, though recommended as best practice by some experts, is not mandated under Ontario regulation.

5. What to do if you have become ill as a result of asbestos exposure?

a. Can I access compensation?

A worker who is removed from exposure to asbestos because an examination discloses they have, or might have, a condition resulting from exposure to asbestos resulting in a loss of earnings, is entitled to compensation in accordance with the *Workplace Safety and Insurance Act,* 1997.

- For further information on asbestos compensation issues, see 'A 2010 comprehensive study of compensation for asbestos related disease in five Canadian provinces (including Ontario)' written by Professor Katherine Lippel, Canada Research Chair in Occupational Health and Safety Law, available at: www.partnershipagainstcancer.ca/wp-content/uploads/Katherine_Lippel_-FINAL-_report_April_20.pdf.

b. Are there provincial or national registries?

Most developed countries have a national asbestos diseases registry, but Canada does not. Given the high number of asbestos-related diseases in Canada, this should be a priority for the country, as it would assist victims to assess medical assistance and compensation and improve the health system's response. The United States has established such a registry. Also, it is recommended that, like the Australian Government, Canada establish a national registry of buildings that have completed an asbestos management plan and recorded the presence of Asbestos Containing Material (ACM) so that this information is available to the public, relevant Government Departments, Emergency Services departments and private contractors.

Under Ontario Regulation 278/05, employers are required to maintain an Asbestos Work Report for employees involved in certain higher risks asbestos operations (section 21). This report must be forwarded to the provincial physician of the Ministry of Labour and provided to the employee in question. Under section 22, this provincial physician, must establish and maintain an Asbestos

Workers Register listing the name of each worker for whom an employer submits an asbestos work report. The purpose of this registry is to collect and store data of hours of worker exposure to asbestos. Upon reaching 2,000 hours of exposure, the worker is notified of their need to have chest x-rays.

6. Are there international agreements that regulate asbestos?

Worldwide, there are 52 countries that ban the use of asbestos. However, asbestos production continues at more more than two million metric tons annually, from countries including Canada, Kazakhstan and Russia. Canada produced around five per cent of the world supply in 2010, approximately 100,000 metric tons.
International statements about the dangers of asbestos and the need for strict regulation have been made by the World Health Organization, the International Labour Organization and through the United Nations.

c. World Health Organization

The World Health Organization (WHO), in collaboration with the International Labour Organization, other intergovernmental organizations and civil society, works with countries towards the elimination of asbestos-related diseases. According to the WHO fact sheet N°343, 'Asbestos: elimination of asbestos-related diseases', this work recognizes that the most efficient way to eliminate asbestos-related diseases is to stop the use of all types of asbestos by encouraging countries to:

-provide information about solutions for replacing asbestos with safer substitutes and developing economic and technological mechanisms to stimulate its replacement;
-encourage measures to prevent exposure to asbestos in place and during asbestos removal (abatement); and
-improve early diagnosis, treatment, social and medical rehabilitation of asbestos-related diseases and to establish registries of people with past and/or current exposures to asbestos.

The World Health Organization Assembly Resolution 58.22 on cancer prevention urges Member States to pay special attention to cancers for which avoidable exposure is a factor, including exposure to chemicals at the workplace. With Resolution 60.26, the World Health Assembly requested the World Health Organization (WHO) to carry out a global campaign for the elimination of asbestos-related diseases.

For more information, see the following WHO fact sheet:
http://www.who.int/mediacentre/factsheets/fs343/en/index.html

d. International Labour Organization

The International Labour Organization (ILO) Asbestos Convention, 1986 (No.162), ratified by Canada in 1988, provides for measures to be taken for the prevention and control of, and protection of workers against, health hazards due to occupational exposure to asbestos.

The Occupational Cancer Convention, 1974 (No. 139), which Canada has not ratified, provides for measures to be taken for the control and prevention of occupational hazards caused by carcinogenic substances and agents.

A resolution concerning asbestos was adopted by ILO at its 95th Session in 2006. It noted that all forms of asbestos, including chrysotile, are classified as human carcinogens by the International

Agency for Research on Cancer (IARC). The resolution further expresses concern that workers continue to face serious risks from asbestos exposure, particularly in asbestos removal, demolition, building maintenance, ship breaking and waste handling activities, and calls for:

> (a) the elimination of the future use of asbestos and the identification and proper management of asbestos currently in place are the most effective means to protect workers from asbestos exposure and to prevent future asbestos-related diseases and deaths; and
> (b) the Asbestos Convention, 1986 (No. 162), should not be used to provide a justification for, or endorsement of, the continued use of asbestos.

For more information see the ILO position on safety in the use of asbestos at: www.ilo.org/wcmsp5/groups/public/--ed_protect/--protrav/---safework/documents/genericdocument/wcms_144446.pdf.

e. United Nations

The United Nations (UN) enacted the Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade in 1998. The primary goal of the Convention is the exchange of information regarding hazardous chemicals in order to protect human health and the environment. The primary mechanism in this convention is to create a list of toxic substances to which a legally-binding Prior Informed Consent procedure applies. For substances on the list, exporting countries are required to ensure that importing countries are aware of the risks involved with the product before consenting to the import.

Canada signed the Rotterdam Convention in 2002, and it came into force in Canada in 2004. However, since 2006, Parties to the Rotterdam Convention have undertaken negotiations to list chrysotile asbestos to Annex III of the Convention, which currently lists 5 of the 6 forms of asbestos, excluding chrysotile. Canada has opposed the inclusion of chrysotile asbestos on the Convention's toxic substances list, which operates by consensus. The result of Canada's opposition means that no country involved in the Rotterdam Convention need apply Prior Informed Consent to the import/export of asbestos.

7. Resources - Where to find asbestos regulations?

Provincially *(all Ontario legislation can be found at http://www.e-laws.gov.on.ca)*

- *Occupational Health and Safety Act*, and its:
  - Regulation Respecting Asbestos on Construction Projects and in Buildings and Repair Operations (O.Reg. 278/05),
  - Regulation Regarding Designated Substances (O.Reg. 490/09), and
  - Workplace Hazardous Materials Information System (WHMIS, O.Reg 860).

Federally *(all Federal legislation can be found at http://laws.justice.gc.ca)*

- *Hazardous Products Act*
  - Ingredient Disclosure List (SOR/88-64)
- *Canada Consumer Product Safety Act*
  - Asbestos Products Regulation (SOR/2007-260)
- *Canadian Environmental Protection Act*
  - Asbestos Mines and Mills Release Regulation (SOR/90-341),
  - Export and Import of Hazardous Recyclable Materials Regulation (SOR-2005-149),
- *Canada Labour Code*, Part II,
  - Canada Occupational Safety and Health Regulation (SOR /86-304)

- *Transportation of Dangerous Goods Act*
    - Federal Transportation of Dangerous Goods Regulation (SOR/2011-60)

8. How is asbestos regulated in Ontario and Canada?

Asbestos is regulated by both federal and Ontario provincial law. Generally, the Federal Government regulates toxic substances under the *Canadian Environmental Protection Act* (CEPA). Asbestos is included on CEPA's "List of Toxic Substances" in Schedule 1 (available online at: www.ec.gc.ca/lcpe-cepa/default.asp?lang=En&n=ODA2924D-1$wsdoc=4ABEFFC8-5BEC-B57A-F4BF-11069545E434), thereby authorizing, but not requiring, the Federal government to regulate the substance.

Specific legislation, outlined below, regulates the use and handling of asbestos in:

- the workplace,
- import, sale and advertising,
- production,
- export,
- waste management,
- residential use, and
- in schools.

a. Workplace

Employers have general duties to ensure the safety and wellbeing of their employees under both the provincial Labour Code and the federal Criminal Code.

The Federal *Occupational Health and Safety Act* has one regulation that specifically regulates asbestos: the Workplace Hazardous Materials Information System regulation (WHMIS, O.Reg 860). WHMIS is Canada's national hazard communication standard. The key elements of the system are cautionary labeling of containers of WHMIS "controlled products", the provision of Material Safety Data Sheets (MSDSs), and worker education and training programs.

Under the Ontario *Occupational Health and Safety Act*, regulations controlling the use of asbestos include:

Regulation Respecting Asbestos on Construction Projects and in Buildings and Repair Operations (O.Reg.278/05)

- This regulation prescribes the methods and procedures that must be used to protect workers from asbestos exposure.
- It applies to: all employees, employers, and owners of a project, repair, alteration or maintenance of a building; any building in which material may contain asbestos; and any work on or demolition of machinery, equipment, aircrafts, ships, locomotives, railway cars where it is likely that material that may contain asbestos will be disturbed or handled (for which the O.Reg.490/09 does not apply).
- It does *not* apply to the owner of a private home that is occupied by the owner or the owner's family, or to the owner of a residential building that contains no more than four units, one of which is occupied by the registered owner or family of the registered owner.

- The regulation does apply to contractors, employers and workers engaged in private construction, repair or maintenance of such buildings. This regulation applies whether or not it is known or suspected that asbestos-containing material will be encountered.
    - For further information see the Guide to the Regulation Respecting Asbestos on Construction Projects and in Buildings and Repair Operations, at: www.labour.gov.on.ca/english/hs/pubs/asbestos.

Regulation Respecting Designated Substances (O.Reg.490/09)

- This regulation prescribes employer duties to employees mining, crushing, grinding or sifting asbestos; workplaces which adapt or use asbestos for manufacturing or assembling of goods or products; employers and workers engaged in the repair, alteration, or maintenance of machinery or equipment, aircraft, ships, locomotives, railway cars and vehicles or work that is necessarily incidental.

b. Import, sale and advertising

The Federal *Hazardous Products Act's* Ingredient Disclosure List (SOR/88-64) and the *Canada Consumer Product Safety Act's* Asbestos Products Regulations (SOR/2007-260) strictly regulate the sale of pure asbestos and certain high risk consumer products that are composed of or contain asbestos fibres.

The Ingredient Disclosure List requires that any product containing 0.1% of dry weight asbestos must disclose this information on Material Safety Data Sheets if found in a controlled product.

Under the Asbestos Products Regulation the advertising, sale and importation of asbestos products are regulated. This regulation controls the use of asbestos, but does not ban it altogether.

The Asbestos Products Regulations allows asbestos products that do not contain crocidolite asbestos to be sold, advertised and imported into Canada, if the asbestos cannot become separated from the product as a result of a reasonably foreseeable use. The permitted products include:

- clothing that provides protection from fire or heat,
- products used by a child in learning or play,
- certain drywall products, and
- spraying products.

Crocidolite asbestos products are more strictly regulated than other forms of asbestos under the Asbestos Products Regulations, although again, permitted in certain uses where asbestos cannot become separated from the product and airborne, for example, in cement pipes. However, specific labeling requirements must be met. Products that are made entirely of asbestos are prohibited, as well as asbestos products for use in modeling or sculpture, or for use in simulating ashes or embers.

c. Production

In addition, the emissions of asbestos into the environment from mining and milling operations are subject to the *Canadian Environmental Protection Act.* The Federal Government has promulgated the *Asbestos Mines and Mills Release Regulation* (SOR/90-341), which regulates the concentration of asbestos fibres that can be released during milling operations.

d. Export

CEPA includes an "Export Control List" (known as Schedule 3), where many asbestos forms have been listed. For example crocidolite asbestos can be found in Part 2 of the Export

Substances List. Substances listed to Part 2 are subject to international commitments such as the Stockholm Convention and Rotterdam Convention on Prior Informed Consent and therefore are subject to consent from the importing country before export. However, chrysotile asbestos remains absent from Part 2. In other words, the export of chrysotile asbestos is unrestricted

e. Residential

The owners and their families living in private unit dwellings, or dwellings containing four units or less, in which the owner and or their family lives, are exempt from Ontario Regulation 278/05. However, any construction, building projects, or maintenance work done on those buildings by hired labour is subject to Regulation 278/05 (see above).

f. Schools

Ontario schools are also subject to Regulation 278/05 (see above); this regulation is designed to protect employees as well as occupants of buildings. Generally older (20+ years) schools should have asbestos management plans in force (see section 8 of the regulation and Answer 4.b); contact your local school board for more information.

9. What is the 'controlled use' approach?

Canada and Ontario take a 'controlled-use' approach to the regulation of asbestos rather than banning it altogether. The governments have taken this approach on the basis that they believe it is possible to effectively protect the population from health risks caused by asbestos exposure through strict regulation.

For example, the Canadian Asbestos Products Regulation (SOR/2007-260) allows for the use of various forms of asbestos in certain products, such as baby toys, so long as any 'reasonably foreseeable use' would not result in asbestos fibres being released into the air, or rather, becoming 'friable'.

CELA believes that although Canada and Ontario have advanced regulatory systems, no amount of regulation can protect individuals from unexpected or unforeseen events. A good example of how even the strictest regulations cannot ensure the safety of Canadians from asbestos exposure is the 2008 Sunrise Propane explosion in Toronto, in which an illegal propane tank transfer resulted in a massive explosion in a residential area causing asbestos-containing material to explode onto homes, a community centre and a playground. Residents had to be evacuated, and thorough safety testing had to be conducted.

Even in a country where regulations are generally respected, it is impossible to guarantee protection from dangerous exposure to asbestos. This concern is even more applicable to developing countries to which Canada has been exporting the majority of its asbestos and where health and safety standards are far less restrictive or indeed may not be in place at all.

For this reason, CELA believes Canada should ban the use, mining, and export of asbestos altogether.

10. What law reform is needed in Canada?

CELA advocates that Canada's controlled use approach is untenable. Ironically, asbestos was recently removed from inside Parliament buildings over health concerns at a great expense, and

yet, Canada continues to allow asbestos-containing products to be sold and produced in Canada, and to export asbestos, primarily to developing countries.

Canada has strict restrictions on the domestic use of asbestos, but up until late 2011 it had been one of the world's leading exporters of chrysotile asbestos. Currently Canada does not have any asbestos mines in production, but its two primary mines in Quebec have only recently stopped production and hope to re-start production.

The vast majority of Canada's asbestos production is destined for overseas markets in developing countries such as India. This is of particular concern because developing countries often lack the safeguards needed to ensure asbestos is used safely or disposed in an environmentally sound manner. Canadian asbestos exports are endangering the lives of workers using the material, their family, the general public, and are creating a hazardous legacy for decades into the future when asbestos-bearing products, particularly in homes and buildings, will be subject to inevitable wear, damage and demolition. The international community has made it clear that Canada's 'safe use' or 'controlled-use' approach to asbestos use is deeply flawed. For example,

The well-documented health risks make it clear that in order to protect its population the Canadian Government should ban all forms of asbestos, just as 52 other countries have already done.

At the very least, it is imperative that the federal government support the international designation of chrysotile asbestos as a hazardous substance in the UN Rotterdam Convention, which will require exporters to provide information of toxicity and safe handling of these substances to importing countries. Many health, labour and environmental organizations have expressed the need for Canada to support the listing of chrysotile asbestos to the Rotterdam Convention.

Additionally, Canada should list chrysotile asbestos on the CEPA Schedule 3 the "Export Control List."

- For more information on position developed by public interest organizations around the globe supporting the listing of chrysotile asbestos to the Rotterdam Convention, see the June 2011 position paper of the Rotterdam Convention Alliance (an Alliance of Environmental, Labour and Health organizations around the world working to promote the full and effective implementation of the Rotterdam Convention) available online at: http://s.cela.ca/files/Position%20paper%20ROCA-2%20(June%202011)_0.pdf.

- A 2006 petition to the Auditor General requested information regarding the state of Canadian chrysotile asbestos policies and includes a detailed response from the federal government outlining their history of funding the asbestos industry and challenging international bans and control of asbestos. To view the petition and the government's response, click www.oag-bvg.gc.ca/internet/English/pet_179_e_28915.html.

11. Resources- Where to find more information?

- Guide to the Regulation 278/05: http://www.labour.gov.on.ca/english/hs/pubs/asbestos/index.php
- Canadian Union of Public Employees (CUPE): http://cupe.ca/asbestos
- Workers Health and Safety Centre, Asbestos Awareness Course: http://www.whsc.on.ca/products/hazard2.cfm?catID=82
- Canadian Association of University Teachers (CAUT), asbestos information page:http://www.caut.ca/pages.asp?page=431