

(d) Sampling of Asbestos in Air (See Article 9 & 10 of DC.V)

We (TBA) fully support a limit value of 1 fibre per cubic centimetre for chrysotile asbestos fibres as specified in the EEC DC.V Document (Article 9) in conjunction with the lowest practicable limit approach stipulated by the United Kingdom's Advisory Committee. However we believe that the standard sampling period should be of 4 hours duration and the 1 fibre limit should be applied over this time. Where work activities do not make it practicable or appropriate to collect a sample over the 4 hr. sampling period, a shorter sampling period should be treated as representative of the longer period but the overall 1 f/ml limit should still apply again as recommended by the UK's Advisory Committee. The requirements of Article 10 of DC.V which call for an action limit of 0.5 f/cc over a 4 hour sampling period (or less) appears to be based on a false assumption.

Footnote for SM only

The proposed "reference period" of 8 hours (in Article 9) appears to allow a 1 hour duration of 8 f/ml followed by 7 hours at zero level. However this seems crazy in relation to the requirements of Article 10.

SUGGESTED SPEECH BY MR. CYRIL SMITH IN PORTHOOMING DEBATE IN THE HOUSE OF COMMONS ON EEC DIRECTIVE ON ASBESTOS-CONTAINING MATERIALS

*See original reference given in previous letter*

In my constituency in Rochdale we have TBA Industrial Products, a part of the Turner & Newall Organisation, which has the largest asbestos textile plant in the world and employs over 2,000 people in the production and marketing of asbestos-based products. TBA has been producing asbestos textiles at Rochdale for over 100 years. This Company exports over half of its output of asbestos-based products, the turnover of which runs in the order of £25M per annum.

It is widely recognised that if not handled correctly asbestos products can cause disease and the incidence of disease today relates primarily back to previous years when processes and dust control were far less effective than today. The concern with asbestos-related disease relates primarily to respirable dust which in other areas such as coal mining, foundry and metallurgical industries etc. can equally cause disease if not handled correctly. It is believed that by controlling asbestos dust levels as proposed by recent UK recommendations incorporated in the 1979 report of the Advisory Committee on Asbestos under the chairmanship of Mr. Bill Simpson and the proposed EEC draft directives that these diseases can be minimised possibly even eliminated in due course. TBA and the industry in general over recent years has expended considerable effort and resources on improving safety standards in their factories and in contributing to epidemiological studies in order to control and hopefully, in due course eliminate such disease, which as I have stated previously, relates primarily to the dustier conditions of yesterday.

Asbestos-based products are still very important today since asbestos fibres have unique properties because of their resistance to high temperature, abrasion, certain corrosive chemicals, liquids and gases. They are used in the form of textiles and often in conjunction with rubber, plastics and cement to fill many important arduous and high performance applications, including friction materials, seals, packings and jointings, protective clothing, insulation of fire

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