Consultation on the Proposed Regulatory Approach to Prohibit Asbestos and Products Containing Asbestos

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1 Introduction

Breathing in asbestos fibres can cause life threatening diseases, such as asbestosis, mesothelioma and lung cancer. All types of asbestos have been reviewed by the World Health Organization (WHO)'s International Agency for Research on Cancer and declared carcinogenic to humans. For more information on the health risks of asbestos, visit: https://www.canada.ca/en/health-canada/services/air-quality/indoor-air-contaminants/health-risks-asbestos.html

On December 15, 2016, the Government of Canada announced a government-wide strategy to manage asbestos in Canada (Canada, 2016a). A number of risk management measures are already in place for asbestos; however, additional controls are required to implement a comprehensive ban on asbestos. A key element of the strategy is to develop new regulations under the *Canadian Environmental Protection Act, 1999* (CEPA) to prohibit asbestos and products containing asbestos.

A Notice of Intent (NOI) to develop regulations respecting asbestos was published in *Canada Gazette*, Part I on December 17, 2016 (Canada, 2016b), as the initial step in the consultation process for the regulatory development.

The objective of this Consultation Document, prepared by Environment and Climate Change Canada (ECCC) and Health Canada (HC), is to inform and solicit comments from stakeholders on the proposed regulatory approach to manage asbestos. Comments on this document must be submitted within 45 days of its publication to the address or email provided in section 5.3. In addition, ECCC and HC are seeking specific information, described in section 5.1.

Comments and information received in response to the Consultation Document will be considered in the development of the proposed regulations, expected to be published in *Canada Gazette*, Part I, by December 2017. The final regulations are expected to be published in *Canada Gazette*, Part II in the fall of 2018.

2 Background

2.1 Asbestos

Asbestos (CAS RN[1] 1332-21-4) is a commercial term given to six naturally occurring silicate minerals that are incombustible and separable into filaments. Asbestos is on the List of Toxic Substances in Schedule 1 of CEPA. This listing covers all six types of asbestos (chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite).

Asbestos is resistant to high temperatures, chemical degradation and wear, and insulates against heat and electricity. Asbestos crystals become long, flexible, silky fibres, so they can be made into a wide variety of forms. The performance capabilities that result from this combination of properties resulted in broad use before asbestos exposure was known to pose health risks (Canada, 2000).

2.2 Asbestos Mining

Currently, there is no mining of asbestos in Canada. The last two remaining asbestos mines, located in Quebec, ceased mining operations in 2011.

2.3 Historical and Current Uses

Historically, asbestos was mainly used for insulating buildings and homes against cold weather and noise. It was also used for fireproofing. While many uses have been phased out, asbestos may still be found in a variety of products including:

- cement and plaster products, such as cement pipe and cement flat board,
- industrial furnaces and heating systems,
- building insulation,
- floor and ceiling tiles,
- house siding,
- car and truck brake pads, and
- vehicle transmission components, such as clutches.

A current use profile has been established using data from a number of sources, including the Trade Data Online website (http://www.ic.gc.ca/eic/site/tdo-dcd.nsf/eng/Home) available from Industry, Science and Economic Development Canada; responses to a mandatory survey on asbestos issued under section 71 of CEPA; comments submitted in response to the NOI; and ECCC's National Pollutant Release Inventory.

According to the Trade Data Online website, Canada continues to import asbestos and products containing asbestos. Table 1 provides the value in Canadian Dollars of

[1] CAS RN: Chemical Abstracts Service Registry Number. The Chemical Abstracts Service information is the property of the American Chemical Society and any use or redistribution, except as required in supporting regulatory requirements and/or for reports to the Government of Canada when the information and the reports are required by law or administrative policy, is not permitted without the prior, written permission of the American Chemical Society.

asbestos and products containing asbestos that were imported into Canada during the 2014-2016 period (ISED, 2017).

Table 1: Canadian Imports of Asbestos and Asbestos Containing Products (Values in Canadian Dollars)

HS Code	Code Description	Value in Canadian Dollars		
		2014	2015	2016
252410	Crocidolite	0	4 237	0
252490	Asbestos, other than Crocidolite	221 647	82 197	164 630
681140	Sheets, Panels, Tiles, Tubes, Pipes, Pipe Fittings, Containing Asbestos	503 768	1 165 557	404 246
681280	Fabricated Crocidolite Fibres;Articles of Crocidolite, other than Headings 68.11/68.13	65 298	58 122	30 604
681291	Clothing, Clothing Accessories, Footwear and Headgear, other than Crocidolite	88 137	118 291	94 893
681292	Paper, Millboard and Felt, O/T Crocidolite	7 882	34 890	16 707
681293	Compressed Asbestos Fibre Jointing, in Sheets or Rolls, other than Crocidolite	23 156	31 308	35 793
681299	Asbestos Fabricated Products, other than Crocidolite	373 629	482 643	516 878
681320	Asbestos Friction Material and Articles Thereof	4 733 642	6 369 034	4 373 455
Total		**6 017 159**	**8 346 279**	**5 637 206**

Information obtained from the mandatory survey notice issued under section 71 of CEPA published in *Canada Gazette*, Part I on December 17, 2016 (Canada, 2016c) was also used to identify current activities respecting asbestos. This Notice required industry to submit information on the manufacture, import, export, and use of asbestos and products containing asbestos when more than 5 kg of asbestos was used in 2013, 2014, or 2015 at a concentration greater than or equal to 0.1%. Therefore, information obtained through the mandatory survey may not be exhaustive, as some activities currently taking place in Canada may not have required reporting. Nine submissions were received which reported that asbestos and/or products containing asbestos are imported and/or used in Canada. The mandatory survey identified the following sectors regarding the use and/or import of asbestos and/or products containing asbestos:

- Oil and natural gas extraction
- Cement pipes and sheets
- Fabric, textile and leather articles

ECCC's National Pollutant Release Inventory and comments received on the NOI were used to identify additional sectors using asbestos, including the chlor-alkali industry.

2.4 Domestic Risk Management

2.4.1 Federal Risk Management

Asbestos and products containing asbestos are currently managed under various federal Acts and Regulations, notably those listed in this section.

The manufacture, importation, advertisement or sale of consumer products made of asbestos and certain high risk consumer products that are composed of or contain asbestos fibres are prohibited or strictly regulated under the *Asbestos Products Regulations*, made under the *Canada Consumer Product Safety Act* (Canada, 2016d).

The *Hazardous Products Act* (HPA) prohibits the sale or import of hazardous products intended for use, handling or storage in a Canadian workplace unless the product is labeled and accompanied by a safety data sheet as per the requirements of the *Hazardous Products Regulations*. Industrial asbestos and industrial asbestos-containing products meet the definition of a hazardous product; therefore, the asbestos content must be identified on the safety data sheet when it is present in a concentration equal or above 0.1% (Canada, 1985; Canada, 2015).

The *Asbestos Mines and Mills Release Regulations* were promulgated on June 14, 1990, pursuant to subsection 34 of CEPA 1988. First issued under the *Clean Air Act* in 1977, these Regulations were intended as a precautionary measure, to limit the concentration of asbestos fibres in gases emitted into the ambient air at asbestos mines or mills from crushing, drying, or milling operations (Canada, 1990).

The *Export of Substances on the Export Control List Regulations* (Canada, 2017a) under CEPA require a prior notification, and may also require a permit, before the export of a substance listed on the Export Control List (ECL) takes place. Crocidolite asbestos (CAS 12001-28-4) has been listed on the ECL since 2000.

2.4.2 Provincial and Territorial Risk Management

All provinces and territories have occupational health and safety (OH&S) legislation (CCOHS, 2017a; CCOHS, 2017b) addressing risks from exposure to asbestos in Canada.

2.5 International Risk Management

More than 50 countries, including the member states of the European Union (EU), have prohibited asbestos (WHO 2014). Actions in other jurisdictions are described below, and are being considered as the proposed regulations are developed.

2.5.1 Risk Management in the United States

In the United States (US), products containing asbestos that are banned include corrugated paper, rollboard, commercial paper, specialty paper and flooring felt. Permitted products containing asbestos include: cement corrugated sheet, cement flat sheet, clothing, pipeline wrap, roofing felt, vinyl floor tile, cement shingle, millboard, cement pipe, automatic transmission components, clutch facings, friction materials, disk brake pads, drum brake linings, brake blocks, gaskets, non-roofing coatings and roof coatings. Any new application involving asbestos that was not carried out historically before 1989 has been prohibited (USFBA, 2017).

On January 21, 2015, the US Environmental Protection Agency (EPA), the Environmental Council of the States[2], and the automotive industry signed an agreement to reduce the use of copper and other materials including asbestos fibres in motor vehicle brake pads. Under this agreement, the use of asbestos fibres in brake-friction materials that exceed the concentration limit of 0.1% by weight has been phased out as of January 1, 2015 (NPDES, 2015).

In 2010, the States of Washington and California adopted Regulations to limit the concentration of asbestos fibres in automotive brake pads and shoes to 0.1% by weight. These prohibitions came into force in 2014 and 2015 in California and Washington, respectively (HWTR, 2017; SCP, 2017).

On November 29, 2016, the US EPA announced that asbestos will be one of the first ten chemicals that will be evaluated for potential risks to human health and the environment under the *Toxic Substance Control Act* (TSCA) reform (OCSPP, 2016).

2.5.2 Risk Management in the European Union

The manufacture, placing on the market, and use of asbestos fibres and of articles and mixtures containing asbestos fibres added intentionally are prohibited in the EU. The restriction includes a time-limited exemption until July 1, 2025 for the use of diaphragms containing chrysotile asbestos in electrolysis installations for chlor-alkali and hydrogen production. This restriction is described under Annex XVII to the Regulation for Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) (REACH, 2017).

2.5.3 Risk Management in Australia

In Australia, the import and export of asbestos and asbestos containing material are regulated at the national level, whereas the manufacture, supply, transport, storage, removal, use, installation, handling, treatment, and disposal of disturbed asbestos or asbestos containing materials are regulated at the state level.

[2] The Environmental Council of the States (ECOS) is a national non-profit, non-partisan association of state and territorial environmental agency leaders in the United States of America (http://www.ecos.org/about-ecos/).

The import into Australia of asbestos is prohibited under the *Customs (Prohibited Imports) Regulations 1956* (Australia, 2015). Some exemptions to the prohibition include:

- the import of raw materials that contain naturally occurring traces of asbestos, and
- the import of asbestos for research, analysis or display provided that a permission to import the chrysotile asbestos or goods was granted by an authorized person.

2.5.4 Rotterdam Convention

All forms of asbestos are listed under the Rotterdam Convention with the exception of chrysotile asbestos, which will be considered for inclusion by Parties to the Rotterdam Convention in Spring 2017. The Rotterdam Convention is a global treaty to protect human health and the environment by establishing a "prior informed consent" procedure for listed chemicals. Through this procedure, Parties must not export a substance to another Party that has stated it does not consent to the import. Importing Parties may also give their consent to import with conditions that exporting Parties must meet (Rotterdam, 2015).

3 Proposed Regulatory Approach

ECCC and HC are considering the enactment of new stand-alone regulations under section 93 of CEPA to prohibit the import, use, sale and offer for sale of asbestos, as well as the manufacture, use, sale, offer for sale and import of products containing asbestos. The key elements of these proposed regulations are described in section 3.1. The export of all types of asbestos and products containing asbestos would be prohibited through amendments to the existing *Export of Substances on the Export Control List Regulations* (ESECLR) (see section 3.2).

The new regulations and amendments to the ESECLR are elements of the government-wide strategy to introduce a comprehensive ban on asbestos to reduce Canadian's future exposure to it. For more information on the government-wide strategy for the management of asbestos in Canada, please visit: http://news.gc.ca/web/article-en.do?nid=1169979&tp=1.

3.1 Proposed Regulations

3.1.1 Substance Scope

The proposed regulations would target asbestos, defined as any fibrous form of mineral silicates belonging to the serpentine or amphibole groups of rock-forming minerals including: actinolite asbestos; amosite; anthophyllite asbestos; chrysotile; crocidolite; and tremolite asbestos. Chemical Abstracts Service Registry Numbers (CAS RN)[3] for these minerals are provided in Table 2.

The prohibition would apply to asbestos and products containing asbestos, as described in item 6 of the List of Toxic Substances in Schedule 1 of CEPA.

Table 2: CAS RN for asbestos minerals

Minerals	CAS RN
Asbestos	1332-21-4
Actinolite	77536-66-4
Amosite	12172-73-5
Anthophyllite	77536-67-5
Chrysotile	12001-29-5
Crocidolite	12001-28-4
Tremolite	77536-68-6

[3] CAS RN: Chemical Abstracts Service Registry Number. The Chemical Abstracts Service information is the property of the American Chemical Society and any use or redistribution, except as required in supporting regulatory requirements and/or for reports to the Government of Canada when the information and the reports are required by law or administrative policy, is not permitted without the prior, written permission of the American Chemical Society.

3.1.2 Application

The proposed regulations would apply to any person who imports, uses, sells or offers for sale asbestos, or who manufactures, uses, sells, offers for sale or imports products containing asbestos, but would not apply to:

- mining,
- processing of mining residues for certain purposes,
- asbestos that is contained in a pest control product as defined in subsection 2(1) of the *Pest Control Products Act*, and
- asbestos or products containing asbestos that are used in a laboratory for analysis, in scientific research or as a laboratory analytical standard in a quantity below a threshold of one gram.

3.1.2.1 Mining

The proposed regulations will not apply to mining activities.

Mining activities are subject to federal, provincial and territorial laws, regulations, and requirements.

As noted in Section 2.2 there is no longer any asbestos mining in Canada. Since the proposed regulatory approach would prohibit the use, sale, offer for sale, export and import of asbestos, there would be no market for asbestos in the future.

3.1.2.2 Mining Residues

The regulations will not prohibit the processing of mining residues to extract metals such as magnesium or other valuable materials, or to produce products or materials that do not contain asbestos.

The mining residue could not be used to manufacture a product containing asbestos as the manufacture, sale, offer for sale and export of products that contain asbestos would be prohibited.

The use of mining residues for construction and landscaping activities would be prohibited.

3.1.2.3 Asbestos Contained in a Pest Control Product

The proposed regulations would not apply to asbestos that is contained in a pest control product as defined in subsection 2(1) of the *Pest Control Product* Act (PCPA). There are no pesticides registered in Canada that contain asbestos. Health Canada's Pest Management Regulatory Agency (PMRA) regulates all pesticides in Canada, under the authority of the PCPA. Health Canada only registers pesticides after a stringent,

science-based evaluation concludes that there are no unacceptable risks to human health or the environment, and that the product has value (PMRA, 2017).

3.1.2.4 Laboratory Analysis and Scientific Research

In order to allow continued research with respect to asbestos, as well as laboratory analyses, the proposed regulations would not apply to the import and use of asbestos and products containing asbestos for laboratory analysis, scientific research or for use as a laboratory analytical standard below a one gram threshold. For a quantity equal to or above the one gram threshold, there would be reporting and record keeping requirements (see section 3.1.4.2).

3.1.3 General Exemptions

The following general exemptions are being proposed for inclusion in the regulations:

- naturally occurring traces of asbestos;
- asbestos or products containing asbestos that were manufactured or imported before the day on which the regulations would come into force.

3.1.3.1 Naturally Occurring Traces of Asbestos

Asbestos is naturally present in soil and rock formations. The proposed regulations would not prohibit the manufacture, use, sale, offer for sale and import of products containing naturally occurring traces of asbestos.

3.1.3.2 Asbestos or Products Containing Asbestos That Were Manufactured or Imported Before the Day on Which These Regulations Come Into Force

The proposed regulations would apply only to activities that occur after the coming into force of the regulations. Therefore, the proposed regulations would not prohibit the use, sale and offer for sale of asbestos and products containing asbestos that were manufactured or imported prior to the coming into force of the regulations such as products containing asbestos found in buildings and in vehicles. These uses will continue to be subject to applicable laws and requirements under Occupational Health and Safety legislation and the Workplace Hazardous Materials Information System (WHMIS).

3.1.4 Specific Exemptions

Specific exemptions will only be considered in exceptional circumstances, taking into account socio-economic factors, the demonstrated absence of suitable alternatives, and with consideration of health risks. Should specific exemptions be included, fixed time limits may be proposed. Any on-going uses allowed through specific exemptions may be accompanied by reporting, record keeping, monitoring, labelling and/or other requirements to inform the public of the presence of asbestos.

In addition to asbestos, the following products containing asbestos are currently imported and/or used in Canada:

- friction materials (e.g., brake pads),
- construction materials (e.g., cement pipes and sheets),
- fabric, textile and leather articles,
- paper, millboard and felt, and
- brake blocks for oil and natural gas extraction.

Only the following specific exemptions are being considered and would be subject to reporting and record keeping requirements:

- asbestos or products containing asbestos displayed for education (e.g. museum), and
- asbestos or products containing asbestos that are used in a laboratory for analysis, in scientific research or as a laboratory analytical standard in a quantity equal or above a threshold of one gram.

3.1.4.1 Asbestos or products containing asbestos displayed for educational purpose

Recognizing Canada's history of asbestos mining, it is proposed to exempt the import and use of asbestos and products containing asbestos strictly for educational purposes, such as for display in museums. However, any facility importing asbestos or products containing asbestos after the coming into force of the regulations would be required to meet the proposed reporting and record keeping requirements as described in sections 3.1.6 and 3.1.7.

3.1.4.2 Asbestos or products containing asbestos that are used in a laboratory for analysis, in scientific research or as a laboratory analytical standard in a quantity equal or above a threshold of one gram

As described in section 3.1.2.4, in order to allow continued research with respect to asbestos, as well as laboratory analyses, the proposed regulations would not apply to the import and use of asbestos and products containing asbestos for laboratory analysis, scientific research or for use as a laboratory analytical standard when the quantity imported or used is below the one gram threshold. However, when the quantity would be equal to or above a threshold of one gram there would be reporting and record keeping requirements as described in sections 3.1.6 and 3.1.7.

3.1.5 Testing

There is no anticipated testing to meet the requirements of the proposed regulations.

3.1.6 Reporting

3.1.6.1 Laboratory and Scientific Research

The proposed regulations would require persons using asbestos or a product containing asbestos in a laboratory for analysis, in scientific research or as a laboratory analytical standard to report their intended use at the beginning of every calendar year if they expect to exceed an annual use of one gram. It would also be required to report the actual use for each calendar year no later than March 31 of the following year. The following information would be required:

- Contact information for the laboratory and for the person authorized to act on the company's behalf,
- The type of asbestos,
- The type and name of the product, if applicable,
- The anticipated period of its use,
- The estimated quantity of asbestos to be used in the calendar year and its unit of measurement,
- The identification of each proposed use and actual use, as the case may be,
- In the case of a product containing asbestos:
    - The estimated quantity of the product to be used in a calendar year and its unit of measurement,
    - The estimated concentration of asbestos in that product and its unit of measurement,
- A description of the safety precautions for the use of asbestos and products containing asbestos.

3.1.6.2 Asbestos or Products Containing Asbestos Displayed for Educational Purpose

The proposed regulations would require persons using asbestos or a product containing asbestos to display for educational purposes (e.g.museum) to report their intended use at the beginning of every calendar year. It would also be required to report the actual use for each calendar year no later than March 31 of the following year. The following information would be required:

- Contact information for the company and for the person authorized to act on the company's behalf,
- The type of asbestos,
- The type and name of the product, if applicable,
- The anticipated period of its display,
- The estimated quantity of asbestos used to be displayed in the calendar year and its unit of measurement,
- The product description of the asbestos or product containing asbestos to be displayed, and
- A description of the safety precautions for the display of asbestos and product containing asbestos.

3.1.7 Record Keeping

Persons subject to any of the reporting requirements of the regulations would be required to keep records of their submissions for 5 years at the principal place of business in Canada.

3.2 Export of Asbestos and Products Containing Asbestos

The proposed regulatory approach to prohibit the export of asbestos and products containing asbestos would be achieved through amendments to the existing *Export of Substances on the Export Control List Regulations* (ESECLR) made under CEPA. These regulations are recognized by exporters as the instrument to consult prior to the export of toxic substances. In addition, these regulations include provisions and requirements to ensure that Canada is compliant with its export obligations under international conventions, including the Rotterdam Convention.

3.3 Changes to Other Regulations

As the proposed new asbestos prohibition regulations would set-out a comprehensive regime prohibiting asbestos and products containing asbestos in Canada, the *Asbestos Products Regulations* made under the *Canada Consumer Product Safety Act* would be repealed.

4 Alternatives to Asbestos

References were reviewed for information on the availability and suitability of alternatives to asbestos. These include the Report of the WHO Workshop on Mechanisms of Fibre Carcinogenesis and Assessment of Chrysotile Asbestos Substitutes WHO, 2018) and “Le point des connaissances sur la Substitution de l’amiante” (INRS, 2003). Table 3 provides a summary of alternatives by type of use.

Table 3: Alternatives to Some Uses of Asbestos

Asbestos Uses	Alternative
Clutches, brake pads, electrical insulators, seals	Artificial mineral fibers, aramid, carbon fibres, polytetrafluoroethylene fibers, steel, copper, non-fibrous material (INRS, 2003)
Asbestos-Cement	Cellulose fibres, polypropylene fibres, polyvinyl alcohol fibres, aramid, fiberglass (rarely) (INRS, 2003)
Asbestos diaphragms in the chlor-alkali industry	Asbestos-free diaphragms and conversion of asbestos diaphragm cell plants to membrane cell plants (European Commission, 2014)

5 Next Steps

5.1 Information Gathering

In order to fill data gaps and obtain the necessary information to conduct a cost-benefit analysis for the proposed regulations, a mandatory survey notice was issued under section 71 of CEPA to gather current information, including the quantity of asbestos and products containing asbestos in commerce in Canada, product types, and the number and size of companies that would be impacted by the proposed regulations.

The data received from the survey have been analyzed, and additional information on certain activities is needed to address remaining data gaps. Stakeholders are invited to submit information in response to the questions below as relevant to their activities:

1. Does your company import or use products containing asbestos for which there is no alternative? If yes, please describe the product and its purpose.
2. Does your company use asbestos to make a product containing asbestos for which there is an alternative(s)? If yes, please:
    - describe the product containing asbestos;
    - describe the alternative(s);
    - provide the cost of reformulation;
    - provide the percentage increase in raw material costs of using alternative(s) to manufacture comparable products; and
    - describe the potential impact on quality of the products.
3. Does your company have an inventory of products containing asbestos? If yes, please describe the type of products and estimate the period of time it would take to eliminate the inventory.
4. Does your company use material that contains naturally occurring traces of asbestos? If yes, please:
    - describe the material;
    - describe the type of product manufactured; and
    - provide the level of asbestos in the raw material and in the finished product.
5. Does your company import or use asbestos or asbestos containing products in a laboratory for analysis, in scientific research or as a laboratory analytical standard? If yes, could you indicate the quantity of asbestos and the concentration of asbestos in the products containing asbestos your company imported or used during a calendar year?
6. Do you anticipate your company would be subject to the reporting requirements described in section 3.1.6 of this document? If yes, please provide the type of employee (salary) required to perform the task and the estimated time that would be required to meet the requirements
7. Do you anticipate your company would be subject to the record keeping requirements described in section 3.1.7 of this document? If yes, please provide the type of employee (salary) required to perform the task and the estimated time that would be required to meet the requirements.

8. The final regulations would be published in *Canada Gazette*, Part II in the fall of 2018. Do you expect your company to completely phase-out the following activities before or by the fall of 2018:
    - import of asbestos or asbestos containing products,
    - manufacture of asbestos containing products, and/or
    - export of asbestos or asbestos containing products.

    Please explain any significant challenges to completing the phase-out by fall of 2018 and provide an achievable timeline for your company to completely phase-out the above listed activities. In addition, provide an estimate of the costs associated with completing the phase-out.

This information will be used to support the development of the regulatory proposal and to assess the incremental impacts of the proposed regulations. Please provide the above-listed information to the contact provided at the end of this document. If you have already provided responses to some of these questions through comments submitted with regards to the NOI or through the mandatory survey notice issued under section 71 of CEPA, please only provide any new information that was not previously submitted.

5.2 Previous Consultation

Twenty-two comments were received following the publication of the NOI on December 17, 2016. Comments were received from three industry associations, eight labour organizations and non-governmental organizations, six regional stakeholders, as well as five individuals.

Stakeholders generally expressed support for reducing and limiting the health risks from asbestos. Many stakeholders were supportive of the prohibition. Stakeholders supportive of a comprehensive prohibition requested that there be no exemptions and no threshold for allowable asbestos in products. Other stakeholders expressed concerns about the application of the prohibition to mining residues. Some stakeholders suggested the need to consider exemptions for certain industrial uses citing socio-economic challenges in moving to asbestos-free alternatives. In addition, some stakeholders commented that any restrictions should be risk-based.

Comments received on the regulatory approach described in the NOI have been considered in the development of this Consultation Document.

In addition to comments submitted on the regulatory approach, stakeholders also provided numerous comments on other elements of the Government-wide strategy for the management of asbestos. These were forwarded to appropriate departments for their consideration. For more information about the Government-wide strategy, visit: http://news.gc.ca/web/article-en.do?nid=1169979&tp=1. For further information on the role of other departments involved with the government-wide strategy, visit: http://news.gc.ca/web/article-en.do?nid=1169989.

5.3 Comment Period

Comments on the Consultation Document must be submitted no later than June 4, 2017 to the contact information below. Comments received will be taken into consideration in the drafting of the proposed regulations.

Pursuant to section 313 of CEPA, any person who provides information to the Minister of the Environment under CEPA may submit with the information a written request that it be treated as confidential. Please address comments to the Chemical Management Division with the subject "***Consultation on the proposed regulatory approach for asbestos***". Comments can be submitted by mail or email.

By mail:
Chemicals Management Division
Environment and Climate Change Canada
Place Vincent Massey, 10th Floor
351 St. Joseph Boulevard
Gatineau, Quebec
K1A 0H3

By email:
ec.amiante-asbestos.ec@canada.ca

A confirmation email will be sent to those that submit their information and comments by email.

5.4 Planned Timelines

Comments on the Consultation Document will be considered in the development of the Proposed Regulations, expected to be published in Canada Gazette, Part I in December 2017 for a consultation period of 75 days. Comments received on the Proposed Regulations will be considered in the development of the Final Regulations, targeted for publication in 2018.

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