

To: National Pollutant Release Inventory, Environment and Climate Change Canada

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ASBESTOS REPORTING THRESHOLD

The National Pollutant Release Inventory Working Group (NPRI WG) considered a review of the reporting threshold for asbestos (friable form) under the NPRI in previous workplans. NPRI decided not to consider changes to asbestos reporting at the March 2019 meeting of the group. Very limited opportunities were provided during the NPRI Work Group meetings and calls for a discussion on this decision. The decision by NPRI not to proceed with reviewing asbestos was based on data collected for 2017 and focused primarily on the data for disposal and transfer for disposal data. No consideration was given to review the trends on asbestos over 5-year and 10-year periods.

Further reconsideration should be given to include a review of reporting on asbestos in the coming NPRI WG workplan. There are several key sources of asbestos releases that would not be captured at the current threshold of 10 tonnes manufactured, processed and otherwise used including releases to water from wastewater treatment facilities. There are hundreds of cement pipes across Canada that are made from mined materials containing asbestos. The delivery of water to and from the home to wastewater treatment facilities requires careful consideration regarding potential releases of asbestos fibres over time.

The impacts to human health associated with asbestos exposure has focused mainly on inhalation and chronic health impacts such as lung cancer, mesothelioma and asbestosis focused on the respiratory system. However, we know that exposure to asbestos also includes impacts to the gastrointestinal tract that can be associated with other cancers including stomach, esophagus and colon region. Given the on-going concerns associated with asbestos exposure and impacts to health, considering routes of releases of asbestos to the environment beyond landfills and transfer off site for disposal or recycling will require consideration of lower threshold and investigating the type of facilities where asbestos releases and transfer may occur, but would not be captured through the current reporting requirements. Some examples would include wastewater treatment facilities and the construction and demolition sectors.

Additional investigation should be considered to see the impacts of lowering the thresholds on asbestos to accommodate this potential source of asbestos to water. There is growing concern associated with the presence of asbestos fibres in drinking water sources as a result of the use of cement pipes used across the country. Many cement pipes may be targeted for upgrades and replacements but many remain in place and may contribute to the release of asbestos to the

environment, particularly to water. These cement pipes if not replaced may be a substantial source of asbestos releases to water over time.

Similarly, ECCC indicated that the Prohibition of Asbestos and Products Containing Asbestos Regulations, which came into force on December 30, 2018 would result in further reductions of asbestos. However, a Quebec based chloralkali plant was given an exemption on asbestos under the regulation. Olin facility reported on asbestos releases to landfill between 2011-2020, showing an increase over that period since 2011. A slight decrease from 2019 to 2020 is also observed but remains higher since 2016 (see: <https://www.canada.ca/en/environment-climate-change/services/national-pollutant-release-inventory/tools-resources-data/all-year-dashboard.html>)



Source: NPRI

Further consideration should also be made to the trends associated with disposal of asbestos on site and those disposals made off site. On the CEC Taking Stock Query, asbestos releases to landfill on and offsite increased to almost 32,000 tonnes in 2018 up from over 23,000 tonnes in 2017. (refer to:

<http://takingstock.cec.org/Report?AgencyIDs=1&ChemicalGroupIDs=200&Culture=en->

[US&IndustryLevel=3&IsDrilldown=true&Measure=3&MediaTypes=29,18,2,41,40,16,60&Report Type=4&ResultType=1&WatershedLevel=2&Years=2018,2017,2016,2015,2014,2013](#)).

Submitted by the NGO members of the NPRI Multi-Stakeholder Working Group