

# MINISTRY OF LABOUR

Submission on working group  
draft final report - Keeping  
Workers, the Public and the  
Environment Safe from Asbestos

February, 2019



## Authority

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This document is respectfully submitted on behalf of the Executive Officers of the BC Federation of Labour and represents the views of more than 500,000 unionized workers belong to our affiliated unions from across the province of British Columbia.



**LAIRD CRONK**  
President  
BC Federation of Labour

# Ministry of Labour Consultation

## Submission on the Ministry of Labour working group report *Keeping Workers, the Public and the Environment Safe from Asbestos*

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The BC Federation of Labour (BCFED) represents more than 500,000 unionized workers in all industries across BC. The BC Federation of Labour is recognized as being the voice for all workers in the province. The BC Fed has a history of working with our affiliates, the Canadian Labour Congress and community advocacy groups to lobby all levels of governments to implement effective measures to ensure that workers, the public and the environment are protected from asbestos exposures. While the BCFED is pleased the Ministry of Labour (MOL) has engaged in a broad consultation process on the issue of asbestos exposure, we are frustrated with the lack of action. In 2017, 71 workers died from asbestos exposure related diseases, the largest category of the total of 198 deaths. <sup>1</sup>

The BCFED appreciates the opportunity to provide our submission with respect to the draft final report *Keeping Workers, The Public and the Environment Safe from Asbestos*. We strongly urge the MOL to immediately proceed with implementing our recommendations.

This submission is done in consultation with our affiliated unions.

### Introduction

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The dangers of asbestos have been known for a long, long time. Roman historian Pliny reported that working with asbestos led to difficulty breathing and respiratory illness. A British government report published in 1898 warned that inhaling asbestos dust was killing workers. In 1918, the Prudential Life Insurance Company stated, “In the practice of American and Canadian life insurance companies, asbestos workers are generally declined on account of the assumed

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<sup>1</sup> <https://www.worksafebc.com/en/about-us/shared-data/facts-and-figures/statistical-reports>

health-injurious conditions of the industry.” The first lawsuits against asbestos manufacturers were filed in 1929.<sup>2</sup>

Belgium was the first country to ban the use of asbestos in 1972. The ban included the use of asbestos for thermal and noise insulation and waterproofing. In 1973, the United States banned the use of spray-applied asbestos-containing material (ACMs) for fireproofing and insulating purposes. From the 70’s through the 80’s, 90’s and 2000’s many countries including those from the third world introduced legislation banning the use, export and import of asbestos and ACMs.<sup>3</sup>

While many countries were banning asbestos Canada was using tax payer dollars to fund the Asbestos Institute and its successor the Chrysotile Institute to promote the asbestos industry. This was all in the effort to protect the last remaining asbestos mine in Quebec.

The Rotterdam Convention is a multilateral treaty to promote shared responsibilities in relation to importation of hazardous chemicals. In 2011, the federal government, as it had done twice previously, successfully blocked asbestos from appearing on the international list of hazardous chemicals, meaning that Canada could continue to export the carcinogenic fibres to developing countries without any warning about the health dangers of asbestos.<sup>4</sup>

Not until 2016 did the Liberal government agree to put asbestos on the Rotterdam list and finally on December 31, 2018 asbestos was banned in Canada.

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<sup>2</sup> <https://ottawacitizen.com/opinion/columnists/amos-and-boyd-learn-from-asbestos-and-do-more-to-protect-canadians>

<sup>3</sup> [http://ibasecretariat.org/chron\\_ban\\_list.php](http://ibasecretariat.org/chron_ban_list.php)

<sup>4</sup> <http://www.greenstreamenvironmental.ca/blog/2011/06/canadian-government-blocks-asbestos-from-hazard-list-at-rotterdam-convention-again/>

Exposure to asbestos is the number one killer of workers in Canada and in British Columbia. Mesothelioma, lung, laryngeal and ovarian cancer and asbestosis are occupational diseases and illnesses caused by asbestos exposure.

Carex Canada has estimated approximately 1900 lung cancers and 430 mesotheliomas are attributed to asbestos exposure each year, based on 2011 cancer statistics. The economic burden of these newly diagnosed lung cancer and mesothelioma cases was \$2.35 billion. Costs are for loss of quality of life, loss of earning capacity, compensation, medical and other support services. Carex estimates that each year 152,000 workers in Canada are exposed to asbestos, mainly in manufacturing, construction and automotive repair.<sup>5</sup>

The BCFED submits that in order to stem this tide of tragic worker deaths the MOL must immediately form a multi-stakeholder group mandated to implement the recommendations of the report and of the BCFED.

## Recommendations

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1. Establishing a Licensing Scheme that would apply to asbestos abatement contractors, consultants and surveyors and that government designate a ministry that would take the lead in working with industry, labour and all other stakeholders to establish a licensing scheme.
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The BCFED strongly urges government immediately proceed with the implementation of a licensing program for contractors, consultants and surveyors. It is remarkable there is no licensing program in BC.

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<sup>5</sup> [https://www.carexcanada.ca/cdn/CAREX\\_OCRC\\_Burden\\_of\\_Occupational\\_Cancer\\_Asbestos\\_factsheet.pdf](https://www.carexcanada.ca/cdn/CAREX_OCRC_Burden_of_Occupational_Cancer_Asbestos_factsheet.pdf)

The Workers Compensation Board (WCB) has issued repeated fines, in the hundreds of thousands of dollars, to two companies for the improper removal of ACMs. In 2016 the WCB slapped BCS Contractors Ltd. with a \$60,000 fine related to the demolition of a home in Burnaby.

“According to WorkSafeBC’s database, five of this firm’s workers were preparing a pre-1990 house for demolition by stripping the interior, when prevention officers inspected the worksite and found that the company allowed its workers to improperly bag asbestos-containing drywall and then dump that drywall in a bin in front of the house.”<sup>6</sup> Seattle Environmental Consulting Ltd was fined over \$500,000 over several years for a long list of asbestos related infractions.<sup>7</sup>

BC can look to many other jurisdictions that have already implemented licensing programs. In 2015, California brought in C-22, a licensing requirement for asbestos contractors administered by the Contractors State License Board, that licenses and regulates the construction industry. All contractors applying for the license must be registered and in compliance with the requirements of the Department of Industrial Relations Division of Occupation Safety and Health.<sup>8</sup>

The BCFED strongly recommends the MOL be the designated lead ministry. In every aspect of the issue of asbestos it is workers’ health and safety that is compromised. If worker health and safety is at risk so is the health and safety of the public. The MOL and WCB have the mandates and expertise to quickly implement a comprehensive asbestos safety program.

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<sup>6</sup> <https://www.burnabynow.com/news/worksafebc-hands-out-thousands-of-dollars-in-fines-for-violations-in-burnaby-1.2129968>

<sup>7</sup> <https://www.cbc.ca/news/canada/british-columbia/b-c-asbestos-removal-company-facing-500k-in-fines-after-latest-safety-violations>

<sup>8</sup> [http://www.cslb.ca.gov/contractors/New\\_C-22\\_Asbestos\\_Abatement\\_Classification.aspx](http://www.cslb.ca.gov/contractors/New_C-22_Asbestos_Abatement_Classification.aspx)

## 2. That the lead ministry and representatives from other parts of government, as necessary and appropriate, work closely with affected stakeholders on the development and implementation of an appropriate licensing model.

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The BCFED recommends that the MOL, as the lead ministry, will immediately form an implementation group consisting of representatives of Federal, Provincial and Municipal governments, the WCB, industry, the BC Federation of Labour, the BC Building Trades, asbestos contractors and other subject matter experts to develop a licensing model.

## 3. That BC move to adopt provincially-recognized standards and programs for the training of asbestos abatement workers.

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The BCFED strongly supports the development of a standardized education program to certify all asbestos abatement workers. The MOL should work with the Ministry of Advanced Education and the Industry Training Authority (ITA). The ITA sets program standards, maintains credential records and issues the Interprovincial Red Seal and B.C. Certificate of Qualifications (C of Q) credentials. As such it is ideally suited to work with a committee of experts, including the WCB and the Building trades to build curriculum for a certifying program for asbestos workers. Once the course is developed it can be broadly available throughout BC from training providers who are public and union colleges and schools offering technical training to support trades programs. The European Union developed a set of practical guidelines for the information and training of workers involved with asbestos removal or maintenance work. The objective with these guidelines is to raise awareness among employees and employers and to motivate them to take preventive actions to protect themselves and the environment from the risk posed by asbestos fibres. The guidelines also standardized the training program across all EU member states.<sup>9</sup>

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<sup>9</sup> <https://osha.europa.eu/en/legislation/guidelines/practical-guidelines-for-the-information-and-training-of-workers-involved-with-asbestos-removal-or-maintenance-work>

4. That the lead ministry, WorkSafe BC, and representatives from other parts of government, as necessary and appropriate, work closely with affected stakeholders on the development and implementation of provincially-recognized standards and programs for the training and certification of asbestos abatement workers.
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This group should also consider whether any certification requirement should apply to all asbestos abatement workers, or whether it should apply just to some workers based upon specified criteria.

The BCFED **strongly disagrees** with the proposal that certification should apply only to some asbestos abatement workers. All asbestos abatement workers must be certified by the same ITA training and education program. Introducing different levels will lead to confusion for employers and workers and this confusion may lead to worker exposures. These could quite possibly be young workers just starting their working careers.

5. That a process involving appropriate and interested government ministries, WorkSafeBC, local governments, BC laboratories currently providing asbestos testing services, and other interested stakeholders be established to develop provincially recognized competencies and practices for analyzing asbestos samples and reporting on results. The purpose of this work would be to document good and best practices that clearly meet the needs of laboratory clients.
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The BCFED recommends that the WCB be charged with the task of certifying asbestos testing laboratories. There are two accreditation organizations already available for testing labs. The first is the Canadian Association of Laboratory Accreditation (CALA) and the US National Voluntary Laboratory Accreditation Program (NVLAP). Both accreditation organizations follow the International Standard Organization ISO/IEC 17025:2017. The WCB should adopt the ISO 17025 which will align BC labs with labs nationally and internationally, therefore the BCFED sees no need to adopt a made-in-BC standard.<sup>10</sup>

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<sup>10</sup> <https://www.iso.org/standards.html>

6. That BC consider adopting an accreditation requirement (such as ISO17025) for laboratories that provide asbestos testing services that is informed by the results of the process proposed in the fifth recommendation.

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The BCFED has stated our position on lab accreditation in the response to recommendation #5.

7. That WorkSafeBC develop and consider options for promoting independent third-party air monitoring.

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The BCFED agrees with this recommendation and would add that the WCB **regulate** the requirement for third-party air monitoring.

8. That the lead ministry engages with local governments, other ministries, WorkSafeBC and other agencies as applicable on steps that could be taken to require that pre-demolition hazardous materials inspections and reports be undertaken by a qualified person, and to require confirmation that an asbestos abatement has been properly completed prior to the issuance of a renovation, demolition or building permit.

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The WCB has requirements for a qualified person in Part 6 Section 6.1, Asbestos of the Occupational Health and Safety Regulation. (OHSR) The WCB should take the lead on setting the requirements for qualified persons.

*“qualified person” means a person who*

*(a ) has knowledge of the management and control of asbestos hazards through education and training, and*

*(b ) has experience in the management and control of asbestos hazards.*

Guideline 6.1-1 describes the relevant competencies of the qualified person.

*“It is not sufficient for a qualified person to simply demonstrate credentials that certain courses have been taken or certain experience has been obtained. The necessary knowledge and experience must be evident in the quality of the work undertaken. When evaluating the qualifications of a person who has prepared an asbestos inventory, risk assessment, work*

*procedure, or work classification, the primary focus will be the quality and accuracy of the inventory, risk assessment, work procedure, and work classification rather than the person's credentials.”<sup>11</sup>*

The BCFED recommends MOL work with the WCB to specify in the **regulation Section 6.1** the specific requirements to determine what qualifies a person to conduct pre-demolition inspections and report writing.

9. That MOH with WorkSafeBC proceed with the development of a public health policy and guidelines to address the previous provincial Medical Health Officer’s concerns about asbestos disturbances in public places that have the potential of placing the general public at risk of exposure to asbestos (see Appendix 2). In addition, MOH and WorkSafeBC complete their work on a Memorandum of Understanding that will establish a protocol for the sharing of information.
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The BCFED recommends the MOL follow the lead of the federal government and implement a registry of all provincially owned and leased buildings. This registry would be expanded to mandate all cities and municipalities to conduct asbestos audits on all public and non-publicly owned by publicly accessed buildings in their jurisdiction. The registries would be widely available to the public.

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<sup>11</sup> <https://www.worksafebc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-guidelines/guidelines-part-06#SectionNumber:G6.1-1>

10. With the view to addressing the confusion and uncertainty expressed by stakeholders about the different definitions in the MOE and WorkSafeBC regulations, MOE and WorkSafeBC develop materials to provide a clear rationale and explanation to all interested and affected parties in the asbestos abatement and disposal process as to why the standards and requirements are different. The intent is that these materials would also clarify the different purposes that they serve and when they apply, with a view to providing clear guidance to interested parties on how these two definitions operate together and not in conflict with one another. That WorkSafeBC develop and consider options for promoting independent third-party air monitoring.

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The BCFED opines that the simplest way to remove confusion is to adopt one definition of ACMs and our recommendation is for the MOL to adopt the superior WCB definition. The WCB definition does not distinguish between friable and non-friable asbestos and adheres to international standards:

*In this section(6.1) and sections 6.2 to 6.32:*

*"asbestos-containing material" means the following:*

*(a) a manufactured article or other material, other than vermiculite insulation, that would be determined to contain at least 0.5% asbestos if tested in accordance with one of the following methods:*

*(i) Asbestos, Chrysotile by XRD, Method 9000 (Issue 2, dated August 15, 1994) in the NIOSH Manual of Analytical Methods, published by the United States National Institute for Occupational Safety and Health, Centre for Disease Control;*

*(ii) Asbestos (bulk) by PLM, Method 9002 (Issue 2, dated August 15, 1994) in the NIOSH Manual of Analytical Methods, published by the United States National Institute for Occupational Safety and Health, Centre for Disease Control;*

*(iii) Test Method for the Determination of Asbestos in Bulk Building Materials (EPA/600/R-93/116, dated July 1993) published by the United States Environmental Protection Agency;*

(b) vermiculite insulation that would be determined to contain any asbestos if tested in accordance with the [Research Method for Sampling and Analysis of Fibrous Amphibole in Vermiculite Attic Insulation](#)(EPA/600/R-04/004, dated January 2004) published by the United States Environmental Protection Agency;<sup>12</sup>

The MOE relies on the Hazardous Waste Regulation definition:

*The Hazardous Waste Regulation defines "waste asbestos" as a hazardous waste if the waste contains more than 1%, by weight, of asbestos fibres and the waste is either a powder/dust or friable. Friable waste means a waste that can be easily crumbled or powdered by hand. Friable material containing asbestos may appear: • fluffy or spongy (usually applied by spraying) • irregular, soft surface (usually applied by spraying) • textured, dense, fairly firm surface (usually applied by trowelling) Asbestos that is tightly bound within a solid matrix so that it is not easily crumbled by hand, is non-friable and is not a hazardous waste.*

*The Regulation is not directed at non-friable materials such as hardboard, brake linings or woven cloth, as long as they are not handled or processed to the point where the materials become friable.* <sup>13</sup>

The BCFED **strongly disagrees** with the opinion of some stakeholders who want to distinguish between the lower risks posed by non-friable asbestos and suggest that a “more flexible, risk-based approach to enforcing requirements regarding safe use, handling and disposal of ACMs.” All non-friable asbestos has the potential of becoming airborne if it is disturbed.

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<sup>12</sup> <https://www.worksafefbc.com/en/law-policy/occupational-health-safety/searchable-ohs-regulation/ohs-regulation/part-06-substance-specific-requirements>

<sup>13</sup> [http://www.bclaws.ca/Recon/document/ID/freeside/63\\_88\\_00](http://www.bclaws.ca/Recon/document/ID/freeside/63_88_00)

11. That the provincial government consider what, if any, role it could play in encouraging and supporting incentive programs that the federal and municipal governments may be considering; whether the provincial government see any role for itself in developing a provincial incentive program; and whether the provincial government should join in or otherwise support stakeholders that have been lobbying the federal government for a national incentive program aimed at encouraging the safe removal and disposal of asbestos.

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The BCFED concurs with this recommendation. The federal government supported the use of asbestos in Canadian homes for decades. In the 1970's and 80's, the government's Canadian Home Insulation Program (CHIP) offered grants for installation of asbestos insulation such as Zonolite in homes. Consumers and builders relied upon the government to ensure these products were safe, as it turned out they were not. The federal and provincial governments must now step up with a renovation tax credit rebate to assist homeowners with the high costs of proper asbestos assessment, abatement and disposal. Incentive programs will increase the public awareness of the dangers of asbestos and reduce the likelihood that homeowners will hire unlicensed contractors and resort to illegal methods to remove and dispose of asbestos. An incentive program would provide greater protections for workers and the public. In the EU there are recommendations that government funding and incentives targeting energy efficiency in buildings be linked with the safe removal of asbestos from these buildings.

*“EU funding and MS incentives targeting better energy efficiency in buildings should be linked with the safe removal of asbestos from those buildings. Whereas the EU has developed an ambitious policy for energy efficiency and the revised Energy Efficiency Directive is expected to establish a long-term strategy in each Member State for renovation of buildings, this policy is not combined with asbestos removal strategies. Such a combination, formulated in a consistent EU policy that integrates the relevant policy areas is strongly recommended.”<sup>14</sup>*

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<sup>14</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52014IE5005>

12. That WorkSafeBC continue with its asbestos awareness initiatives, and that it consider expanding these initiatives to other target audiences as warranted and appropriate. (e.g. the automotive and maintenance industry)

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In a 10 -year period from 2008-2018 Canada imported more than a \$100 million in asbestos brake pads and brake linings. There were no requirements that these imported products had to be properly labelled as hazardous and that they contained asbestos, so automotive workers were unaware of the exposures. Canada was importing these products years after the exports in 2011. And there were made-in Canada alternatives, manufactured at ABS Friction in Guelph, Ontario, the only asbestos-free brake pad factory left in Canada.<sup>15</sup> Carex Canada estimates that 4,300 workers in the automotive industry are exposed to asbestos every year and yet there are no OHS regulations specific to the industry.<sup>16</sup>

The BCFED recommends the WCB continue with the asbestos awareness campaign and specifically target the automotive sector. In addition, the BCFED recommends WCB conduct an extensive review of the OHSR Part 6 Asbestos regulation and at a minimum bring it up to requirements that are equivalent to the new OHSR Part 6 Silica regulation.

13. That the provincial government and WorksafeBC work with stakeholders to develop additional public knowledge and awareness initiatives that focus on changing public attitudes.

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The BCFED agrees MOL should work with the WCB to fund a public communications campaign to increase the public's awareness of the dangers of asbestos exposures.

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<sup>15</sup> <https://www.theglobeandmail.com/report-on-business/imports-of-asbestos-products-rising-in-canada-despite-health-warnings/article23675154/>

<sup>16</sup> [https://www.carexcanada.ca/en/asbestos/occupational\\_estimate/](https://www.carexcanada.ca/en/asbestos/occupational_estimate/)

#### 14. That local governments continue to develop and pilot test measures aimed at making it easier for home owners to dispose of small quantities of ACMs.

The BCFED strongly disagrees with this recommendation. Local governments should not bare the burden, including financial costs, of determining appropriate disposal methods for any amounts of ACMs. The Federal and provincial governments must provide adequate funding to cities and municipalities for the proper identification, assessments, safe removal and disposal of ACMs. Poland is the only EU country to have a centrally funded asbestos removal program and even their local governments complain that they are not properly funded to do the work required.<sup>17</sup> There should be no cost to homeowners to dispose of small amounts of ACMs.

#### 15. That the lead ministry and MOE engage with local governments and the private sector to develop and consider options for addressing stakeholder concerns about insufficient capacity within BC for the safe disposal of ACMs.

The BCFED concurs with the position adopted by the European Economic and Social Committee on “Freeing the EU from Asbestos”.

*“Landfills for asbestos waste are only a temporary solution to the problem, which is thus left to be dealt with by future generations, as asbestos fibres are virtually indestructible over time. Therefore, the EESC calls on the Commission to promote to promote systems for destroying products that contain asbestos (systems such as plasma torches, pyrogasification, etc.), referring to the Best Available Techniques. Research and innovation should be promoted to implement sustainable technologies for the treatment and inertisation of waste containing asbestos with a view to their safe recycling, re-utilisation, and the reduction of their disposal in landfills. The Commission should provide for effective measures to avoid the hazardous practice of delivering asbestos waste to landfills that are foreseen for general building refuse.”<sup>18</sup>*

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<sup>17</sup>[https://www.researchgate.net/publication/311556227\\_The\\_efficiency\\_of\\_systemic\\_solutions\\_for\\_the\\_removal\\_of\\_asbestos\\_in\\_Poland\\_-\\_current\\_status\\_and\\_prospects](https://www.researchgate.net/publication/311556227_The_efficiency_of_systemic_solutions_for_the_removal_of_asbestos_in_Poland_-_current_status_and_prospects)

<sup>18</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52014IE5005>

The BCFED recommends the provincial and federal governments fund research and innovation to implement other, more sustainable methods of disposing of asbestos.

In the meantime, the MOL and MOE need to expand the sites for disposing ACMs in BC. These new sites need to accommodate larger amounts of ACMs as well as small homeowner amounts. BC should not be dumping our ACMs in other jurisdictions, such as Alberta. The shipping process ensures that along the route there will inevitably be more worker and public exposure. The development of more disposal sites will also help ensure that reduction of illegal dumping by unscrupulous contractors.

#### 16. That using the naturally occurring asbestos sub-team's report as a basis, MOE, MOH and MEMPR work together on any other potential steps and a path forward.

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The BCFED is concerned about possible naturally occurring asbestos in other areas of the province. We encourage MOL to ensure that funding is provided to conduct research into identifying any other areas of BC where asbestos may occur naturally. We are most concerned about possible exposures to workers who work outside and may be engaged in work that disturbs the soil. Naturally occurring asbestos presents the same dangers as ACMs.

#### Compensation for workers with occupational diseases caused by exposure to asbestos

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The BCFED is disappointed the working group did not discuss the current compensation system for asbestos related diseases. A 2008 report from the Rideau Institute estimated that in BC, 1,500 workers would die from asbestos caused disease within the following 5 years.<sup>19</sup> Meanwhile a UBC study of health records and workers compensation data from 1992-2004

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<sup>19</sup>[http://areafund.ca/Fund\\_News/Entries/2012/9/3\\_Mentioned\\_in\\_the\\_Media\\_files/2010\\_TheProvince\\_AsbestosTopKiller\\_Sept\\_2010.pdf](http://areafund.ca/Fund_News/Entries/2012/9/3_Mentioned_in_the_Media_files/2010_TheProvince_AsbestosTopKiller_Sept_2010.pdf)

found only 23 per cent of victims of asbestosis file a WCB claim and less than half of all cases of mesothelioma are compensated by the WCB.<sup>20</sup>

The BCFED has previously recommended that section 6(3) of the WCA be amended to create an exception to the “immediately before the date of disablement” requirement for occupational disease which typically have a long latency period before diagnosis or disablement. This requirement means that presumption that the disease is work related is denied. Amending this section would ensure that many more very ill workers would be eligible for compensation.

WCAT has many decisions over the years on the influence of section 6(3)

Secondly, the BCFED also recommended, in our 2009 *Insult to Injury* report, the reinstatement of lifetime pensions beyond the age of 65. Many workers exposed to asbestos develop the disease after they have retired and are not eligible for a permanent disability pension.<sup>21</sup>

It is unacceptable that employers are not paying the price for exposing workers to asbestos. Part of the asbestos implementation program must be full and fair compensation paid to the thousands of workers who will develop an asbestos exposure related disease.

## Conclusion

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In the report, Section 3: Asbestos Abatement and Disposal Process describes the complex process for the abatement and disposal of ACMs. The BCFED could not agree more with the following;

*“As noted above, the asbestos abatement and disposal process both cuts across a number of regulatory bodies and levels of government and contains several checks and balances within it. While, in theory, the different bodies and levels of government should be able to work together for the overall benefit of the parties and the process, there can be situations where the process doesn’t fully capture the situation, where multiple bodies may be working at cross-purposes with one another, or where there*

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<sup>20</sup> <http://pwhs.ubc.ca/research/policy-and-program-evaluation/mesothelioma-awareness-and-compensation/>

<sup>21</sup> <https://bfed.ca/news/briefs/insult-injury>

*may be opportunities to use key checkpoints in new or different ways.”<sup>22</sup>*

And herein lies the biggest challenge, to create a regulatory system that provides clarity and consistency so that all parties understand the requirements. A clear and concise regulatory framework across all regulatory bodies and levels of government will increase compliance by the asbestos removal industry. There is no question this must be done, and the need is urgent to protect workers, the public and the environment.

The BCFED appreciates the work the Ministry of Labour has done in this report and for the opportunity to provide our feedback. We strongly encouraged the Ministry adopt their proposed recommendations with consideration for our additional recommendations.

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<sup>22</sup> Keeping Workers, the Public and the Environment Safe from Asbestos: Working Group Draft Final Report and Recommended Actions | **PG 20**