

To **Ms. S. Gabizon**,

Executive Director of WECF

2 March 2010

Dear Ms. Gabizon,

Having read your report on the final round of negotiations (Bonn, 13-19 January 2010) on the draft declaration to be adopted by the Fifth Ministerial Conference on Environment and Health, Parma, Italy, 10-12 March 2010, we think it necessary to comment on it based on recent research and factual data on the topic in question.

We highly appreciate the fact that in the report you focused on existing health risks for children posed by poor environmental and living conditions, including lack of safe water and sanitation. We agree with you that these problems have been amplified by the world economic crisis.

It goes without saying that noncommunicable diseases are preventable through adequate policies in areas such as urban development, reduction in transport emissions, elimination of foodstuffs that induce diseases and even lethal poisonings. Insufficient resources for minimization of effects of these and other negative factors complicate the solution of problems related to children's health. Therefore the call to collaboration of states to improve and develop better health and environment legislation is extremely urgent.

Yet, along with the above issues that raise no doubt and deserve all possible support the report contains some debatable conclusions including those related to commitments to ban the use of chrysotile asbestos, one of the best studied natural minerals.

We regret that you and your network, while declaring the concern about children's health to which affordable housing, drinking water, sanitation and etc, as we all agree, must contribute, have joined the anti-asbestos lobby pursuing their commercial interests covered up by a "touching" concern about health of children in Russia, China, India, etc. Do you really believe in the sincerity of such a concern? Isn't it obvious that they strive for a bigger market for their products, and this is the only true reason for an aggressive anti-asbestos campaign?

Have you ever thought that your participation in the anti-asbestos information war can lead to significant rigors for millions of families with children in need of shelter due to the lack of economic prerequisites of using expensive substitute building materials instead of affordable chrysotile-cement ones.

As an environmentalist you must know that many substitutes, specifically bituminous building materials including polymer and other roofing materials, pose real danger to the environment since the majority of them (especially those shipped to the developing countries) emit such carcinogens as benzo(a)pyrene, phenol, formaldehyde, dioxins and other hazardous substances during their production, use, and disposal.

Chrysotile-cement materials emit no hazardous substances, and this has been proved by numerous studies and is consistent with the laws of physics (the chrysotile fiber in the cement matrix cannot get out of chrysotile cement, especially in concentrations hazardous for human health and the environment).

During the meeting in Bonn the Russian specialists opposed the chrysotile ban being guided by the decision of the Sixtieth World Health Assembly (2007) about a differentiated approach to different types of asbestos and research data on safety of its controlled use. We are for this way since it is hundreds of times less economically burdensome especially for the developing countries.

The Russian delegation was an official negotiator and its representatives participated in the discussion of the declaration as a whole, proposed on correcting or specifying a number of items of the declaration. Unfortunately, you, for some reason, heard only those related to asbestos. You have the right to suggest something on any question but you have no right to blame the Russian delegation for a subjective approach to considering the declaration. It insisted on the elimination of any occupational diseases by means of their prevention. The focus on asbestos-related diseases in the declaration is an obvious confirmation of lobbying the interests of producers of asbestos substitutes by its authors and by your network as well.

In your report you made use of the trumped-up data of the anti-asbestos lobby on the asbestos bans in industrialized countries (mainly the countries of the European Union) neglecting that

- for decades these very countries had mainly used imported amphibole asbestos;
- the business elite of these countries builds its chemical plants that pollute the environment with hazardous carcinogens that a man cannot be protected from in the developing countries;
- the advocates of the asbestos ban have manipulated the figure of 100,000 asbestos deaths annually for many years; yet, this figure is nothing but a prediction that has never come true but contributed to forcing the asbestos scare.

As for the laboratories which can measure exposure of workers and the population to asbestos and informing the population about safety measures, they are all preventive actions taken in many countries with least expenditures.

This is the optimum way of achieving the goals of the WHO and your public organizations on protecting health of workers and the population as a whole.

In conclusion we consider it important to note the following:

1. Some negotiators are amazingly insistent in their striving to sustain the asbestos scare. We want to hope that this is related to insufficient knowledgeability of the authors of the draft rather than other causes.

2. To our opinion, any issues shall be considered with account for all available research data including the differences in spheres of application of this or that material in different countries and in different time periods. A one-sided view on the problem may lead to disorientation of the public opinion and distraction of attention of the international community from truly urgent issues of environment and health and to the ineffective use of resources.

3. At present amphibole asbestos, the uncontrolled use of which in some West European countries during the 20th century led to tragic consequences, is banned in all countries of the region.

4. As for the chrysotile asbestos, higher risks were observed only from occupational exposure to concentrations exceeding the present levels by tens and hundreds of times (if you have different evidence, please send it to us for examination).

5. The problem of chrysotile asbestos is the problem of occupational health so it shall be considered within the framework of implementation of the global plan of action on workers' health 2008-2017 adopted at the Sixtieth Session of the World Health Assembly.

6. All countries where chrysotile asbestos is still used have entered the discussions on banning asbestos by 2015. The proposal to ban asbestos from building materials and products was supported only by those countries where the use of all forms of asbestos had been already banned. So the question is what these countries commit to do within the framework of the declaration? It is beyond any doubt that these countries impose there will on other countries.

The permission or ban on a product is a domestic affair of a country and cannot be considered within this Declaration.

Executive Director

Mr. V. Ivanov