

CHEMICAL HAZARDS

Risks related to asbestos exposure (excluding construction sites)

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This is a translation of the original French version available at: [Programmes de santé au travail pour les établissements / Commission des normes de l'équité de la santé et de la sécurité du travail - CNESST](#). In the event of any discrepancy or inconsistency between the French and English versions, the French version shall prevail.

1. INTRODUCTION

1.1. Background

Workers can be exposed to asbestos in the workplace. Under certain conditions, asbestos-containing materials can release asbestos fibres into the air. Workers exposed to them risk developing serious lung diseases (fibrosis, cancer). These diseases generally appear more than 10 years after the onset of exposure, and sometimes after 30 or 40 years.

Every year, deaths are caused by occupational injuries and illnesses that are compensated by the Commission des normes, de l'équité, de la santé et de la sécurité du travail (CNESST). For at least a decade, more than half of these deaths have been caused by exposure to asbestos. The health of Quebec workers must therefore be protected by controlling this exposure.

1.2. Legal obligations

This occupational health program is developed in accordance with section 107 of the *Act respecting occupational health and safety* (AOHS). The employer is required to take it into account in its prevention program (AOHS, s. 59) or in its action plan (AOHS, s. 61.2). This program contains recommendations for the prevention of health problems linked to asbestos exposure. In particular, it sets out the preventive measures to be implemented to protect the health of exposed workers. Thus, the employer must determine which actions of the occupational health program to consider and include in its prevention program or action plan to deal with situations of exposure to asbestos in its workplace.

Section 61 of the AOHS provides that the Commission may order an employer to submit a prevention program. It may also order the employer to amend the content of the program, in particular to bring it into line with the elements of the occupational health programs it develops. Section 127(1) of the AOHS provides that the public health director may assess the components of a health program, prevention program or action plan and make recommendations to the employer, the Commission and, where applicable, the health and safety committee.

The AOHS lays down general obligations for employers and workers. Other targeted obligations are prescribed in the *Regulation respecting occupational health and safety* (ROHS) and in the *Safety Code for the construction industry* (SCCI). This health program targets workplaces that do not meet the definition of a construction site.¹

1. Construction site (AOHS, s. 1): means a place where foundation, erection, maintenance, renovation, repair, alteration or demolition work is carried out in respect of a building or of civil engineering works, on and at the site itself, including the preparatory work of land clearing or earth moving and any other work determined by regulation, and the lodging, eating or recreational facilities put at the disposal of the construction workers by the employer.

For construction sites, refer to the specific occupational health program.

The information presented in this health program provides general guidelines. It is strongly recommended to consult the tools presented in the section [For more information](#) for the preventive actions to be implemented in workplaces.

2. RISK PROFILE

2.1. Overview

“Asbestos” refers to a group of fibrous minerals composed of silicates, divided into two main groups:

- Serpentine, which contains only one type of asbestos, chrysotile (white asbestos), which was mined in Quebec in the past
- Amphibole, which include several types of asbestos: crocidolite (or blue asbestos), amosite (or brown asbestos), actinolite, anthophyllite and tremolite

Only chrysotile, amosite and crocidolite have been exploited for commercial or industrial purposes. These various types of asbestos differ in their chemical arrangement and size (i.e. fibre length and diameter).

The size criteria used to define fibres vary depending on the country, organization, and analytical method used. In Quebec, a regulatory respirable asbestos fibre is defined as any asbestos fibre with a length-to-diameter ratio greater than 3. Only fibres longer than 5 µm should be considered for measurement purposes.

There are also short asbestos fibres with a length of less than 5 µm and fine asbestos fibres with a diameter of less than 0.1 µm.

2.2. Use

Asbestos is known for its insulating properties and high thermal, chemical and mechanical resistance. For these reasons, it has been incorporated into the manufacture of various construction products (e.g. vinyl asbestos tiles, asbestos-cement pipes, wallboard). Asbestos is present in many materials used in buildings and infrastructure, most of which were built before 1990 (e.g. fire-resistant or heat insulating materials such as flocking). Asbestos is also found in other products such as brake pads and gaskets. It can also be incorporated into asphalt shingles or road surfaces.

In Quebec, the use of asbestos-containing flocking and heat insulating materials was banned in 1990 and 1999 respectively. Gypsum board and joint compound manufactured after January 1, 1980 are considered free from asbestos.

Asbestos mining was a major industry in Quebec for many decades. It generated asbestos mine tailings, which were generally accumulated in the form of dumps.² These residues have been used to backfill residential, commercial and industrial land, under railroads and in some underground infrastructure. Quebec stopped mining asbestos in 2012. However, the tailings dumps still contain asbestos (1 to 40%) and could be revegetated or mined for certain metals (e.g. magnesium).

Since 2018, a federal regulation has prohibited the sale, import, manufacture and use of asbestos-containing products, with some exceptions. However, this regulation does not apply to asbestos mine tailings, except for certain exceptions provided for in section 6.

2.3. Health effects

Asbestos fibres, sometimes invisible to the naked eye, enter the respiratory tract through inhalation. Once deposited on lung membranes, they become embedded and accumulate, causing scarring and irreversible health effects.

Repeated exposure to asbestos fibres increases the probability of developing disease. The risk increases based on three main factors: concentration, duration and frequency of exposure. All types of asbestos and all asbestos fibre lengths have a toxic potential. There is no such thing as risk-free exposure to asbestos. Inhalation of asbestos fibres can lead to the following diseases in particular:

- **Asbestosis:** Chronic irreversible disease that reduces lung elasticity and makes breathing difficult (pulmonary fibrosis).
- **Mesothelioma:** Malignant tumour (cancer) in the envelope of the lung (pleura), abdominal cavity (peritoneum) or heart (pericardium) The average survival time is one to two years. The main symptoms are chest pain, shortness of breath and a dry cough.
- **Lung cancer:** The main symptoms are a chronic cough, blood in the sputum (phlegm), shortness of breath, weight loss and chest pain.

Other types of cancer are also caused by asbestos, such as ovarian and laryngeal cancers, and possibly colorectal cancer.

² Dump: heap formed with the sorting and washing waste from a metal mine.

2.4. Legislation and best practices

2.4.1. Regulatory requirements

In Quebec, asbestos is a regulated substance. Divisions³ of the ROHS set out the obligations and preventive measures to be implemented for exposure to asbestos in establishments. In addition, performing work on asbestos-containing materials in establishments requires the application of subdivision 3.23 of the SCCI, *Work liable to produce asbestos dust emissions*.

Schedule I of the ROHS sets a permissible exposure value for asbestos of 0.1 respirable fibres per cm³ of air, regardless of the type of asbestos. This is a time-weighted average exposure value (TWAEV) for an eight-hour working day.

Regardless of its form, asbestos is recognized as a substance with a proven carcinogenic effect in humans (C1). Consequently, workers' exposure must be reduced to a minimum (notation of EM in the ROHS), even when the TWAEV is observed, as indicated in section 42 of the ROHS. Compliance with the TWAEV does not preclude the application of other regulatory provisions specific to asbestos (e.g. provisions on the safe management of asbestos).

Asbestos may be present outside an establishment or construction site, for example on the site of an asbestos mine tailings dump. In the presence of asbestos, worker protection is governed by the AOHS, and the ROHS or SCCI can be used as best practice.

The preventive measures provided for in the law and regulations are the minimum to be implemented. Knowing and understanding them are essential to protect workers from asbestos exposure.

This health program does not replace the regulations governing asbestos exposure in Quebec. It is a tool to help workplaces manage this risk.

2.4.2. Zero tolerance

Exposure to *asbestos dust*⁴ is one of CNESST's zero-tolerance targets. This is a hazard with serious consequences, deemed intolerable. Consequently, immediate corrective measures must be taken if a worker is exposed to asbestos. To help employers learn more about these hazards, CNESST has on its website the [Zero-tolerance sheet - Asbestos: danger of exposure to asbestos dust](#) (in French only).

³ Air quality (division V), respirator (division VI), special provisions concerning various dangerous substances (division IX), provisions on the safe management of asbestos (division IX.1) and means and equipment for individual and group protection (division XXX).

⁴For the purposes of this health program, "asbestos dust" refers to dust containing asbestos fibres.

3. AT-RISK SECTORS OF ACTIVITY, OCCUPATIONS, AND TASKS

Exposure to asbestos can occur in many sectors of activity and affect a wide range of occupations and jobs. It can occur when a worker works directly on an asbestos-containing material, or through accidental contact. Exposure is also possible when a worker is in an environment that may contain this material.

Examples of economic sectors at risk

- Maintenance and repair of structures that may contain asbestos
- Treatment of asbestos waste
- Building and housing services
- Professional, scientific and technical services
- Fire departments, specialized contractors
- Generating value from asbestos mine tailings
- Ship maintenance and repair

Examples of occupations and jobs at risk

- Laboratory personnel sampling and analyzing materials likely to contain asbestos
- Electrician, plumber, pipe fitter, carpenter, welder, insulator
- Heavy equipment operator
- Firefighter, post-fire investigator
- Machine and equipment maintenance mechanic
- Janitor and superintendent
- Personnel responsible for collecting and burying asbestos waste
- Material handler, stock clerk

4. PREVENTION APPROACH

To prevent risks to workers' health, all workplaces must identify, correct and control these risks.

4.1. Identify and analyze risks

Materials⁵ can be divided into two categories: materials likely to contain asbestos (**MLCAs**) and asbestos-containing materials (**ACMs**).

⁵ "Material" is used in a broad sense. It includes any contaminated product, material, debris, residual matter or soil.

- **MLCAs** are materials whose composition has incorporated asbestos at certain periods in their manufacture. They are presumed to contain asbestos, unless proven otherwise. A non-exhaustive list of materials that may contain asbestos, such as flocking and heat insulating materials, can be found in Appendix D of the [Guide to safe management of asbestos](#) (in French only).
- **ACMs** are materials where the presence of asbestos has been demonstrated. Thus, MLCAs can become ACMs. Note that asbestos mine tailings are considered ACMs.

With the exception of construction sites, which are covered by another health program, there are two types of work situations where workers may be exposed to asbestos:

- Situation 1: Tasks likely to emit asbestos dust.
- Situation 2: Presence of materials likely to contain asbestos (MLCAs) or asbestos-containing materials (ACMs) in a workplace, including buildings and civil engineering structures.

Workplaces need to identify these two situations in order to implement the required preventive measures.

Situation 1: Tasks likely to emit asbestos dust

In this situation, workers may be exposed to asbestos dust either through direct handling of MLCAs or ACMs, or through actions on contaminated materials or objects.

For certain tasks similar to those carried out on construction sites (e.g. running a cable through asbestos-containing flocking in a building's ceiling space, or screwing a picture frame onto an asbestos-containing plaster wall), refer to the construction site health program. It will indicate the preventive measures to be implemented.

Examples of tasks likely to emit asbestos dust:

- Mining of asbestos mine tailings for commercial purposes
- Work on asbestos mine tailings, such as slope levelling, or rehabilitating or revegetating tailings dumps
- Loading, transporting on a conveyor and sorting construction debris that may contain asbestos, in a sorting centre that accepts this type of material

Other examples of situation 1 are shown in the appendix.

Situation 2: Presence of materials likely to contain asbestos (MLCAs) or asbestos-containing materials (ACMs) in a workplace, including buildings and civil engineering structures

This situation arises if MLCAs and ACMs can be found in the workplace. In certain circumstances, depending on their condition, these materials can emit asbestos dust without any handling or action that could alter them.

Examples include interior cladding materials forming part of buildings or civil engineering structures, such as insulation (flocking and heat insulating materials), plaster or stucco walls or vinyl floors. Often, these materials were installed during the initial construction. When damaged, asbestos dust can become airborne and be breathed in by workers. Other examples of situation 2 are shown in the appendix.

Most buildings (e.g. hospitals, schools, CEGEPs, universities, office buildings) and civil engineering structures forming part of the establishment (e.g. asphalt parking lots, outdoor reservoirs and piping systems) could be affected by situation 2. Many were built before the 1990s, when asbestos was widely used.

In both situations, the risk of exposure to asbestos depends in particular on:

- the **condition of the material**, which may deteriorate over time due to vibrations and impacts. Damaged materials are characterized by the presence of debris, hanging pieces, cracks, dust, stains, etc.
- the **friability of the material**. The risk is greater with friable material. This type of material can be crumbled, pulverized or powdered by hand pressure when dry or that is already crumbled, pulverized or powdered (e.g. damaged plaster wall that is crumbling).
- worker **access** to the material.

The following table summarizes the conditions for determining whether there is a risk of exposure to asbestos in each situation.

Situation 1: Tasks likely to emit asbestos dust	Situation 2: Presence of materials likely to contain asbestos (MLCAs) or asbestos-containing materials (ACMs) in a workplace, including buildings and civil engineering structures
Risk is present - Any situation corresponding to one of the following statements:	
<ul style="list-style-type: none"> • Identification of MLCAs, ACMs and contaminated objects was not done. • Workers are exposed, and the preventive measures required when working on materials or objects are not all implemented or are ineffective.^a 	<ul style="list-style-type: none"> • MLCAs and ACMs are not located or inspected when required. • The presence of MLCAs and ACMs losing their integrity (e.g. damaged) can be a source of exposure for workers. • The measures required to control these sources of exposure are not implemented or are ineffective.^b
Risk is controlled - Any situation corresponding to all of the following statements:	
<ul style="list-style-type: none"> • MLCAs and ACMs and contaminated objects are identified. • Exposure is controlled by implementing all the preventive measures required to protect workers during tasks performed on materials or objects. These measures are effective. 	<ul style="list-style-type: none"> • MLCAs and ACMs are located and inspected when required. • Exposure is controlled by implementing the measures required to correct the situation associated with the materials losing integrity and these are effective (see section 4.2).
Risk is absent	
<ul style="list-style-type: none"> • Absence of MLCAs, ACMs or contaminated objects in tasks. 	<ul style="list-style-type: none"> • Absence of MLCAs and ACMs.

- a. **Ineffective** preventive measures will not prevent or minimize workers' exposure to asbestos when performing various jobs.

Examples of **ineffective** preventive measures:

- Leak-tight containers used to package asbestos-containing debris that tend to open, unravel or tear during handling.
- Significant visible dust when moving asbestos-containing materials on a conveyor despite the implementation of preventive measures (e.g. ventilation system and wetting of asbestos-containing materials).
- Use of a respirator by a worker with a beard.

- b. **Ineffective** preventive measures will not prevent or eliminate the suspension of asbestos dust by damaged materials after the work has been carried out.

Examples of **ineffective** preventive measures:

- Non-leak-tight covering of a wall with damaged flocking.
- Pieces of heat insulating materials in poor condition left in an isolated area of the workplace following repair or removal work.

4.2. Correct risks

Once high-risk work situations have been identified, preventive measures must be implemented to eliminate or control workers' exposure to asbestos dust. These measures must be chosen in accordance with the [hierarchy of controls](#) and comply with applicable regulations.

Elimination at the source ensures the highest level of protection, since the risk is then removed from the workplace (e.g. an ecocentre that refuses to receive MLCAs and ACMs). When elimination at the source is not possible, a combination of preventive measures must be implemented.

Preventive measures to be implemented	
During tasks likely to emit asbestos dust (situation 1)	In the presence of materials likely to contain asbestos (MLCAs) or asbestos-containing materials (ACMs) in a workplace, including buildings and civil engineering structures (situation 2)
<p>Before performing tasks likely to emit asbestos dust, the employer must take certain measures in order to eliminate or, at the very least, control the risk of exposure to workers. It must, in particular:</p> <ul style="list-style-type: none"> • provide a means of locating or identifying MLCAs, ACMs and contaminated objects in the workplace in which work will be performed • check for asbestos in MLCAs and potentially contaminated objects^a • take the preventive measures required to control the dispersion of asbestos dust, such as the following:^b <ul style="list-style-type: none"> ○ enclosing processes ○ wetting materials ○ using source capture systems (e.g. high-efficiency particulate air (HEPA) filter systems) ○ installing ventilation systems or improving general ventilation ○ avoiding activities that generate asbestos dust (e.g. instead of cleaning with an air jet, using HEPA-filtered vacuuming or wetting) ○ providing a double changing room for workers for decontamination purposes ○ disposing of asbestos debris in leak-tight, clearly identified containers, and transporting them to an authorized site^c 	<p>The employer must implement preventive measures to eliminate or control the emission of asbestos dust (safe management of asbestos). It must, in particular:</p> <ul style="list-style-type: none"> • provide a means of locating or identifying MLCAs and ACMs in the workplace • check the condition of materials when required (e.g. damage, deterioration) • check materials for asbestos, where required^a • depending on the condition of the damaged or degraded materials, remove them, repair them or contain them, as required by regulations governing work on construction sites^g • ensure that the register for the safe management of asbestos-containing materials is kept up to date (location and condition) • train and inform workers about the risks involved in the safe management of asbestos, and regularly remind them of procedures and good work practices

Preventive measures to be implemented	
During tasks likely to emit asbestos dust (situation 1)	In the presence of materials likely to contain asbestos (MLCAs) or asbestos-containing materials (ACMs) in a workplace, including buildings and civil engineering structures (situation 2)
<ul style="list-style-type: none"> • train and inform workers on the risks associated with the tasks to be performed and on safe work methods^d • regularly remind workers of procedures and best work practices • prohibit eating, drinking, chewing or smoking in the workplace • provide respirators, supported by a respiratory protection program (RPP)^e • provide appropriate asbestos protective clothing (e.g. type 5 clothing or equivalent)^f 	

- The regulations provide for two means of demonstrating that materials do not contain asbestos: verifiable documentary information (e.g. technical description) or a sampling report including the results of an analysis (ROHS, s. 69.4). A visual inspection to demonstrate the absence of asbestos in materials likely to contain asbestos (MLCAs) does not constitute valid proof within the meaning of the regulation.
- Many divisions of the ROHS apply ([see the section Regulatory requirements](#)). Under section 69.14 of the ROHS, the employer has the same obligations in this respect as those provided for in the SCCI (chapter S-2.1, r. 4).
- Disposable personal protective equipment (such as coveralls and respirator filters) must be treated as asbestos-contaminated products and disposed of safely after use and at the end of work.
- Training must be tailored to all workers, including those with occasional exposure (e.g. students and temporary or agency workers).
- For further information, refer to divisions VI and IX.I of the ROHS. The respiratory protection program must comply with CAN/CSA-Z94.4-11.
- During heat waves, wearing a hooded suit can limit evaporation of sweat and generate additional risks due to thermal stress. To assess these risks, refer to the tools presented in section [For more information](#) of this document.
- Voluntary renovation work carried out by the employer could also constitute a construction site. Whether for mandatory or voluntary work on damaged materials, refer to the SCCI to determine the preventive measures to be taken.

4.3. Control

Once preventive measures have been implemented, the employer, in collaboration with the workers, must ensure that they remain in place permanently.

The following monitoring, assessment, maintenance and follow-up measures must therefore be implemented:

- Carry out regular inspections to ensure that workers are making proper use of preventive measures.
- Regularly reassess the possibility of implementing other preventive measures to further reduce workers' exposure, particularly in the event of new work situations.
- Measure the concentration of asbestos fibres in the respiratory zone of workers at least once a year, in accordance with section 43 of the ROHS.
- Keep a register for the safe management of asbestos-containing materials (ACM) in buildings containing them, and keep it up to date.
- Assess and update the [respiratory protection program \(RPP\)](#) annually. (in French only)
- Adhere to the terms and conditions of medical supervision.

5. MEDICAL Surveillance

Asbestosis is the only disease resulting from asbestos exposure for which screening recommendation could be justified. This must be carried out in accordance with the recommendations of a Réseau de santé publique en santé au travail (RSPSAT) occupational health physician, in conjunction with the necessary preventive measures, and never as a substitute for them.

Workplaces with a proven risk of asbestos exposure should contact their local occupational health teams or an occupational health physician, who will determine whether screening is required, taking into account the worker's exposure and work history. In addition, the [Practice guide concerning the worker's free and informed decision in the context of occupational health screening or medical surveillance \(2019\)](#) (in French only) should be applied during medical surveillance.

6. SERVICES OFFERED BY RSPSAT TEAMS

The Réseau de santé publique en santé au travail (RSPSAT), together with its partners and in accordance with its legal mandates under the *Act respecting occupational health and safety* (AOHS), the *Public Health Act* (PHA) and the *Act respecting health services and social services* (AHSSS), works to prevent and protect workers' health by supporting workplaces in meeting their obligations to prevent occupational illnesses. The RSPSAT has multidisciplinary teams (medical, nursing, occupational hygiene, ergonomics, psychosocial risks, etc.) with expertise in occupational health that are entirely funded by the Fonds de la santé et de la sécurité du travail. It has been offering its services free of charge throughout Quebec since the adoption of the AOHS in 1979.

Specifically, with regard to the risk posed by exposure to asbestos, the RSPSAT may:

- Support identification, analysis, and prioritisation of risks in the workplace
- assess and measure worker exposure
- support the workplace in prioritizing the preventive measures to be implemented, taking into account other hazards present in the workplace
- support the workplace and advise on the choice of preventive measures to be implemented
- assess the effectiveness of preventive measures implemented
- provide information sessions on health effects, preventive measures to be used and the respiratory protection program to raise awareness among workers and employers
- support the workplace in developing its respiratory protection program and selecting respirators
- carry out medical surveillance based on the recommendations of the occupational health physician

For more information on the service offering, visit www.santeautravail.qc.ca.

7. SERVICES OFFERED BY OTHER PARTNERS

The CNESST's other [partners](#) help support workplaces in their OHS management efforts in many ways. The [joint sector-based associations](#) (JSAs) provide their members with services:

- advice and personalized assistance
- training and information
- research and development on the prevention of work-related accidents and illnesses

If you're linked to a JSA, you can find out about the specific services it offers its members.

The CNESST and the MSSS would like to thank the following partners for their participation in the development of occupational health programs:



For general information, [contact the CNESST](#).

8. FOR MORE INFORMATION

8.1. Additional information for workplaces

CNESST web pages

- [CNESST](#)
- [Toxicological directory](#) (in French only)
- [Managing asbestos safely \(gouv.qc.ca\)](#) (in French only)
- [Working in the heat... Be careful! - 4th edition \(gouv.qc.ca\)](#) (in French only)
- [Working in the heat - supplementary information sheet for employers \(gouv.qc.ca\)](#) (in French only)

Laws and regulations

- [Act respecting occupational health and safety \(AOHS\)](#)
- [Regulation respecting occupational health and safety \(ROHS\)](#)

[Institut de recherche Robert-Sauvé en santé et en sécurité du travail \(IRSST\)](#)

- [Computer-based tools for workplace heat stress \(irsst.qc.ca\)](#)

8.2. Additional information for specialists

[Réseau de santé publique en santé au travail \(RSPSAT\)](#)

- Groupe de travail sur le consentement éclairé en santé au travail. *Practice guide concerning the worker's free and informed decision in the context of occupational health screening or medical surveillance* (in French only), 2019.

[Institut de recherche Robert-Sauvé en santé et en sécurité du travail \(IRSST\)](#)

- OUELLET, Capucine and Charles LABRECQUE. *Respiratory protection guide* (in French only), 2022. RG-1123-fr. [Respiratory protection guide \(irsst.qc.ca\)](#) (in French only)
- DROLET, Daniel and Guylaine BEAUCHAMP. *Sampling guide for air contaminants in the workplace*, 8th edition, 2012. T-06. [Sampling guide for air contaminants in the workplace \(8th edition, version 8.1, updated\) \(irsst.qc.ca\)](#)

Instrument loan, calibration, repair and analysis services are also available.

APPENDIX

Situation 1: Examples of workplaces where tasks likely to emit asbestos dust are performed

- Engineered landfill where asbestos-containing construction debris is dumped.
- Garages or workshops where work is performed on vehicles or equipment contaminated by dust or asbestos (e.g. maintenance of construction site vacuum cleaners, brake pads).

Situation 2: Examples of situations where materials likely to contain asbestos may be found in a workplace, including buildings and civil engineering structures

- Accumulated debris (e.g. boiler pipe debris) left unattended in a room of a building following construction work.
- At an ecocentre accepting construction debris that may contain asbestos, materials were piled up and left unprotected in a section of the establishment. Asbestos dust may be dispersed.