scientific and medical research can provide information useful for risk-benefit analysis. Perhaps there was good reason to argue for immediate, drastic action such as a complete ban when the asbestos problem first became widely known more than 30 years ago, but this was not done.

The EPA proposed a ban in 1979 on the manufacture of asbestos-containing products in the United States. Many of the questions raised by Jack Siemiatycki¹ were asked and answered when a court of appeals remanded the matter back to the EPA in 1991 because they "failed to muster substantial evidence" to support their position that modern asbestos products present an unacceptable risk to the public.² The EPA did not provide this evidence. We argue that it does not exist.

In calling for a complete ban now, the Collegium Ramazzini states, without evidence, that the risk of chrysotile asbestos is too great and that exposure cannot be controlled.³ On the contrary: exposures in the last 20 years seem to have been very well controlled. The increased rate of mesothelioma in the United States, which the Collegium uses to bolster its claim, occurs only among people old enough to have been exposed before 1970.

The Collegium argues, without proof, that all types of asbestos fibres present cancer risks so similar as to be indistinguishable. It ignores the characteristics, such as biopersistence and surface chemistry, that make some materials more carcinogenic than others. Yet it is these very characteristics that are needed to explain why substitutes such as synthetic vitreous fibres are safer.

The Collegium's approach to the health hazards of low-level asbestos exposure is behind the times. Because of its obsession with chrysotile asbestos, the Collegium has missed the really nasty hazards of the last half century, next to which the hazards of low-level asbestos exposure seem insignificant. The arsenic catastrophe in Bengal and Bangladesh is one example.

It is not too late to change. Let us urgently study the list of issues raised by Michel Camus⁴ and agree upon a proper comparative risk assessment.

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Tot much has changed concerning the morality of continuing to produce and sell asbestos since my editorial on the subject was published in CMA7 14 years ago. Jack Siemiatycki's balanced and thoughtful summary2 is useful, but one may doubt that his recipe for resolution of the question will actually contribute much toward a solution. The problem is that the range of risk estimates is so wide and the exposure data are so poor that the choice between alternatives becomes essentially arbitrary. I reviewed the problem of asbestos in 1994 but was unable to suggest any way of improving the risk estimate procedure or of resolving the question.3

Since then, the Canadian government has challenged the French government's decision to join other European countries in banning the use of asbestos, and it was threatening to raise the matter with the World Trade Organization. As far as I am aware, this issue has not been debated in the House of Commons, nor is there a white paper

outlining the Canadian government's defence of the use and export of asbestos. In my editorial, I argued that the Canadian medical profession had a responsibility in relation to this question, but I am still not sure how this should be exercised.²

My own position is that the difficulty in evaluating the risk management, the undoubted danger of the material when inhaled and the existence of satisfactory substitutes should lead to a decision that the use of asbestos should be discontinued.

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[Philip Landrigan responds:]

The principal reason for the Collegium Ramazzini's call for an international ban on all uses of asbestos is to protect the health of workers in developing nations. In many of those countries, production and use of asbestos are increasing, cocupational safeguards are weak to non-existent and the prospect looms for an epidemic of asbestos-related disease that will dwarf the epidemics that occurred in North America and Western Europe.

Richard Wilson and colleagues and David Janigan miss this central point when they argue that a ban on asbestos is unnecessary because rates of mesothelioma are declining in the United States and other developed countries. It is well to recall that these declines are the result of strong regulations that were imposed on asbestos despite the continuing objections of the asbestos industry and their apologists, and despite continuing calls by those groups for yet more study, more risk assessment and more cost–benefit analysis.