

March 24, 1976

Mr. Robert W. Gutheil
Group Vice President
Borden Chemical
180 East Broad Street
Columbus, Ohio 43215

Dear Bob:

Thanks very much for your letter of March 15, in which you make yourself very clear. Needless to say, I have no intention of upsetting Borden or the other film manufacturers by that letter to the Sierra Club which was written for me by staff and Hill and Knowlton under the supervision of the Vinyl Chloride and PVC Producers Committee.

As a matter of fact, I think we have a much larger problem here than is reflected in disagreement over what was said by me to the Sierra Club.

First, I think its time to review the purposes and activities of the PVC Packaging Film Group. As I recall, this group was not allowed to function in MCA and was taken on by SPI in order to be of help to the members. At least in all the meetings of this group where SPI staff has been present, I don't believe there have been any indications given to us of dissatisfaction with SPI.

As you well know, we have been hard at work representing the VCM/PVC Producers Group for the past two years. Borden has participated in that program, although not always very actively. Our records show that Henry Peed is the voting representative for Borden on that group. I can only hope that he has been keeping you informed and that your wishes have been expressed to him so that he or one of his staff could make these things known to us. I am aware, for example, that your group in Borden was not particularly happy to have us take on the proposed FDA Standard because film was cleared and at least some of your people felt that we should have left well alone. As it stands, however, we represent all of the industry, including the Blister Pack and Bottle people.

Although not mentioned in your letter, Mr. D'Amato is very unhappy with us about the California bill. Please understand that on behalf of SPI I am the only one empowered by our bylaws to retain outside

SPI23404

- 2 -

Mr. Robert W. Gutheil
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counsel. This we did, with proper notification both to SPI's Public Affairs Committee and to the VCM/PVC Producers Committee. We moved fast. We were not aware that Borden had also hired an attorney. There is no way that this attorney can be considered an authorized representative of SPI. I have had no contacts with the man to this date.

Very clearly, there is a need for better communications here. I do believe that on your next visit to New York it would be of great advantage if you and I could meet and talk about these various matters.

Please do not take anything I have said in this letter as antagonistic. I don't feel that way. Rather I am a bit saddened and confused by these matters. I do think that everything could be cleared up if there was closer touch maintained and if Borden representatives were more active in SPI.

I look forward to hearing from you.

Cordially,

Ralph L. Harding, Jr.
President

RLH:sms

cc: Jerry Carroll
John Lawrence
Sam Nuspliger
Jerry Heckman
Bob Farrante
Ross Adams
Bob Downey

SPI23405

March 29, 1976

Dr. R. Oelker
Unionplast
Unione Nazionale Industrie
Materie Plastiche
Via Petitti 16
I-20149 Milano
Italy

Dear Dr. Oelker:

As indicated in my cable sent today, the best way for you to keep posted on our every changing vinyl chloride situation is to keep in touch with Mr. Dornemann, Dr. Camani or Dr. Holmes-Walker. In addition, Montedison is an active member of the PVC Producers Committee of CEFIC. The European most concerned with PVC food packaging is Jean-Claude Thomas at Rhone Poulenc. As you may know, the CEFIC Committee has just issued an excellent summary statement on PVC for packaging under the title of "Vinyl Chloride Toxicity and the Use of Polyvinyl Chloride for Packaging Foodstuffs." While not for general distribution, this is an excellent report.

We understand that the Food and Drug Administration will not be making a decision before June at the earliest - and probably later. Also, we note that the European PVC industry is taking a very different and far more realistic approach, built around 50 parts per billion. Again, I urge you to coordinate with Montedison on this matter.

I trust the two enclosures are also helpful.

Cordially,

RLH:lj
Enclosures

SPI23407

May 4, 1976

Mr. John C. Gmalch
Marketing Manager
New England Plastics Corporation
310 Salem Street
Woburn, Massachusetts 01801

Dear John:

Thanks for your letter of March 29. After having taken the OSHA standard to the Court of Appeals and lost and to the Supreme Court where review was turned down, we really don't have many grounds left for disputing the OSHA standard on VCM. Meanwhile, the reduction of monomer in the resin has freed many more processors from any obligation under the standard.

You are right, of course, on the "over kill" imposed by the VCM standard. On the other hand, the VCM/PVC producers have learned to live with it. As long as they have no inclination for any more fighting, perhaps you and I should leave it alone.

Cordially,

RLH:lj

CC: J. Cahn
Wm. Miller

SPI23410

May 14, 1976

Mr. Barry Barnes
ICI
P. O. Box No 6
Bessemer Road
Welwyn Garden City
Hertfordshire, England

Dear Barry:

It was certainly good to hear from you in your letter of April 22. We are sorry to see you leave the front-line forces on the VCM matter. On the other hand, I must say that there are many days when I wish I could also be transferred away from further involvement. Meanwhile, we are being kept fully posted and the liaison is excellent with John Stafford. Further, Dr. Karl Hochschwender of American Hoechst has been set up as an on-going liaison officer between CEFIC and the VCM/PVC Producers Group over here.

I have just written to John Stafford to tell him of our plans to be in London beginning June 17 - 20. As I explained to John, I believe the information flow is sufficiently up to date so that a telephone call will suffice for any last minute items. I explained to him that I have this continuing desire to see more of London than is normally possible. May I also give you a call to extend personal greetings? Frankly, I had hoped that I might see Allan Barrett but his "diary" is full. This was in connection with my offer to be of some assistance in connection with the formation of the new Association of Plastics Manufacturers in Europe.

Please give our very best to Jean.

Cordially,

RLHlj

SPI23411