REPORT OF SUBCOMMITTEE ON MODEL LABELING

During the past year, the New York City and Chicago Health Departments have been most active in resolving the problem of lead poisoning of children. As part of this increased interest in public health, various charges were made in the press regarding lead poisoning of children, many of which were attributed to chewing of peeled paint chips. As might be expected, proposals for legislation were prepared which required warning labels on containers of paints containing lead.

At the same time, it was evident that various states, such as New York and New Jersey, would join Illinois and California in the adoption of rules and regulations relating to the labeling of dangerous and harmful substances. Extension of this legislation to other states is expected. This probability prompted steps to maintain uniformity of regulation so one label could be used nationally.

To meet this dual situation, President Battley appointed a special committee consisting of industry members having outstanding technical, legal, sales and toxicological background. This special committee recommended that a standing committee be formed by the Association to investigate the question of precautionary labeling; that the specific question of lead poisoning be studied; and that the work of various other agencies engaged in the study of lead poisoning problems should be followed to make sure that the interests of the industry are protected.

In accordance with that recommendation, President Battley established the Subcommittee on Model Labeling as an adjunct of the Committee on Model Labeling Bill. The subcommittee first met on June 15, 1954. Thereafter, the subcommittee met at least once a month during July, August and September. In July, the subcommittee submitted the following recommendations: (1) An educational program conducted by the Association should be started as soon as possible; (2) The Association should prepare a list of paint raw materials that might be hazardous and distribute this information to members; (3) The Association set up machinery to investigate each future poisoning case attributed to the eating of paint, whether or not fatal.

595 VJN

Association action was immediately initiated on these recommendations.

The subcommittee then turned its attention to the problem of precautionary labeling. After considerable work done by a special task group, consisting of members of the subcommittee and the Association staff, suggested precautionary labels for products of the industry were prepared. The subcommittee considered the recommended labels and submitted them to the Executive Committee for adoption. The purpose of these suggested labels was (1) prepare the industry to meet anticipated lead poisoning legislation; (2) comply with existing laws and regulations relating to the labeling of dangerous and hazardous substances; and (3) bring about uniformity so that a label prepared by a manufacturer could be used in any state or territory where he may market his products.

The precautionary labels, after approval by the Executive Committee, were submitted to public health officials for their consideration.

It is noteworthy that both the New York City and Chicago Public Health Departments, both of which were contemplating the enactment of legislation requiring "POISON" or "UNSAFE" label designations on paint containing lead or other harmful substance, have accepted the industry's recommended labels with respect to these substances. Health officials of both cities, as well as other interested agencies, have been lavish in their praise of the industry and of the Association for the progressive and forward action taken to meet this Health-Education question and to bring about a realistic approach to this public health program which has been receiving nationwide interest and consideration.

The subcommittee believes that this aggressive and forward action on behalf of the industry is the proper approach to any prospective legislation or public health

activities which, without this action by industry members and the Association, might otherwise be onerous and burdensome to the marketing of the industry's products.

We respectfully express our appreciation to the American Standards Association's Z66 Subcommittee on Safe Labeling of Coatings for Children's Toys and Furniture. This Subcommittee considered and studied the identification or labeling of paint products to indicate they are safe to use in painting objects or surfaces which might be chewed by children. Their study of the danger to children through chewing or swallowing by children of dried paint coatings from surfaces accessible to children is a great toxicological contribution to our industry. Several members of this Subcommittee served as representative paint manufacturers on this ASA group. This Subcommittee used much of the ASA findings and conclusions in preparing the precautionary labels recommended for general use by our industry.

Respectfully submitted,

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