

FILE NAME: Flooring (FLR)

DATE: 1980 Aug 22

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DOCUMENT DESCRIPTION: Jack Clegg Memo Stating Strong Opposition Against the Necessity of Labeling

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AMT-94

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Jack Clegg

RE: ASBESTOS REGULATIONS

August 22, 1980

The move by State and Federal Agencies to legislate mandatory labeling of asbestos containing products is of serious concern to our industry. In addition to the Connecticut House Bill #5807 and the pending New York State legislation (copies attached) CPSC considering a mandatory rule requiring manufacturers to inform consumers by way of labeling about the presence of asbestos in the product and about proper installation and removal techniques. At the RFCI level, we are taking every avenue open to us to dissuade CPSC from instituting mandatory labeling of our products. Armstrong is also unilaterally taking a strong position against such labeling.

The Connecticut Bill has passed the House and Senate and is now pending Governor's approval. It is not clearly defined that our products specifically will come under the Bill, but from the intent of the legislation, it would appear that they will. The snowball effect could spread rapidly to other States, each requiring different wording and become a labeling nightmare.

Beyond a strong position against the necessity for labeling, in view of wide discrimination of the "Recommended Work Procedures For Resilient Floor Coverings" by RFCI and member Companies and the warnings contained in individual manufacturer's literature, there is little other action we can take.

With respect to the "Comprehensive Asbestos Seminar" being held in New Haven on September 10 (copy of brochure enclosed), we should consider attendance by our Safety Director and/or others involved in OSHA compliance within the Company.

JC:nn

Jack Clegg

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