From: **Shripal Sharma**
Sent: 10/3/2011 5:09:00 PM

To: Michael.Greene@imerys.com
CC:
Subject: FW: Contractors

Mike,

Below is the e-mail I sent to Eve in August detailing the role of Bill Kelly. Please let me know if you have any question or concerns.

Thanks, Shripal

From: Sharma, Shripal (RTM)
Sent: Friday, August 12, 2011 11:43 AM
To: ebrooks@imerys.com
Subject: RE: Contractors

Hi Eve,

The only outside contractor/consultant I use in the US for regulatory purposes is Bill Kelly. Here are some details about Bill and his services since the year 2000:

Bill works for Center for Regulatory Effectiveness (CRE). The arrangement with CRE has been in place, with adjustments to the monthly retainer, since November 2000. CRE is not a traditional "contractor" or "consultant." It is a federal regulatory "watchdog" organization that assists mainly corporations with advice and intervention in federal regulatory issues that threaten their business. Its staff is comprised mainly of former federal government officials and lawyers who understand and intervene in the regulatory system. Companies who enlist the assistance of CRE are considered "sponsors" who make "donations" to CRE and request its help on specific issues that have wide significance. In doing its work for such sponsors, CRE retains a high degree of independent judgment and decision-making, and does not "represent" companies in the traditional legal sense. However, CRE is part of a consortium of companies that work on regulatory/informational issues, and that consortium includes Multinational Legal Services (MLS), PLLC, a law firm, and Multinational Business Services, Inc., a traditional consulting firm. At times, Luzenac has dealt with MLS in order to have the benefit of an attorney/client relationship.

Redacted

Term of contract

Month-to-month. No specific term. Terminable at any time.

Scope of Work

Redacted

Following are a number of accomplishments/activities for which CRE has either been principally responsible or in which it has played a large part:

The decision by the National Toxicology Program (NTP) to defer consideration of its 2000 review of its talc nomination for inclusion in the Report on Carcinogens.

Drafting of detailed scientific comments, adopted by CTFA (Cosmetic, Toiletry, and Fragrance Assoc., now the Personal Care Products Council), to NTP concerning the focus of its continuing review of talc from 2001 to 2004 and liaison with NTP officials and staff concerning the review. The decision by NTP in 2005 to withdraw its nomination of both industrial and cosmetic talc for inclusion in the Report on Carcinogens (and subsequently persuaded NTP to totally revise its peer review system for the Report on Carcinogens).

Drafting of detailed comments, adopted by IMA-NA, to ACGIH regarding its proposal to lower its TLV for talc, with the result that ACGIH first deferred its review and then decided not to adopt its proposal to lower the talc TLV.

Extensive participation in the 2006 IARC review of talc for its cancer monographs encompassing preparation for the IARC meetings in the form of comments on the scientific iteration, obtaining nominations for expert consultants to IARC by the Gynecologic Oncology Group, participating in consultation with industry observers during the monograph meetings, communications with IARC staff and NTP observers, and follow-up commentary and debriefing of expert participants with regard to the outcome (evaluation of perineal use of talc-based body powders as "possibly a human carcinogen, with three dissents).

Numerous meetings with gynecologic scientists/doctors to discuss the talc/ovarian cancer issue and potential avenues for additional research.

Established strong relationships with the Cosmetic Ingredient Review regarding its planned safety review of talc and provided CIR staff with a bibliography of the relevant scientific literature.

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Monitored all developments pertinent to talc at CIR, Proposition 65 rulemaking and litigation in California, Canadian labeling regulations, OSHA implementation of the Globally Harmonized System of Hazard Classification, and Congressional bills and deliberations concerning amendments to TSCA that could include restrictions on talc.

Obtained favorable clarifications regarding references to talc in the NIOSH "roadmap" for further research on asbestos and other elongate mineral particles.

Monitoring the scientific literature for new studies or commentary regarding talc, and commenting on any new materials.

At present, continuing to make preparations for CIR's planned review of talc safety beginning in 2012 (summarizing the scientific literature, discussing the issue with CIR staff, and discussing possible participation in the review with gynecologic oncology experts.

Retainer/hours and financial terms

We currently pay $6,000 per month to CRE, which covers 24 hours of work each month. If work time in a particular month goes over 24 hours, the billing rate rises to $350/hr. The 24 hr. allotment works out to $250/hr., which is a low rate that CRE has kept in effect since 2000 in view of the close and steady long-term relationship with our company.

Redacted

Eve, this is a bit longer than you may have expected but it provides details about how Bill's services has helped protect and grow our business and maintain our market leadership. I strongly recommend to retain him as a consultant whose expertise is needed to defend our business from a number of on-going and anticipated regulatory issues facing the talc business.

Please let me know if you need additional information from me.

Best regards, Shripal

From: ebrooks@imerys.com [mailto:ebrooks@imerys.com]
Sent: Monday, August 08, 2011 12:08 PM
To: Cutler, Kent (RTM); Kopp, Jim (RTM); Downey, Pat (RTM); Francoeur, Mike (RTM); Sharma, Shripal (RTM); edward.mccarthy@imerys.com; Panion, Fred (RTM); Saied_kochesfahani@imerys.com; Hentz, Forrest (RTM); Schweighofer, Eric (RTM); Pier, Julie (RTM)
Subject: Contractors

Please send me a list off all contractors (including temporary workers) in your area. Both single contractor/consultant along with any subcontracting relationships. Include: Name, term of contract, brief scope, any minimum hours/retainer requirements, and financial terms (Rates per hour, per day, per month, etc.).

Please send confidentially back to my attention. If I can get back by the end of the week that would be great.

Thanks,

Eve

Eve Brooks
Regional Director
Human Resources Americas

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