

FILE NAME: Union Carbide (UC)

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CORRESPONDENCE

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UNION CARBIDE

UNION CARBIDE CORPORATION Old Ridgebury Road, Danbury, CT 06817
METALS DIVISION

To (Name):	Mr. W. C. Thurber	Date:	December 4, 1981
Division:	Metals	Originating Dept:	R W Rebholz
Location:	J1398	Area:	
Area:		Subject:	<u>Carcinogen Labeling Policy</u>
Copies to:	Mr. J. Myers - King City		

Attached are draft policies covering:

- o Chronic Health Hazard Labeling - Carcinogens
- o Distributor Policy (Re:Product Safety)

These drafts will be reviewed on December 9th at a Product Safety Communications Committee meeting here in Danbury. I will attend the meeting and would appreciate your comments regarding the attached.

Copies of the drafts have been sent to John Myers via the telecopier machine and he has agreed to call here December 7th with his comments.

RWR:sf
Attachment

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PURPOSE/BACKGROUND

One element of an effective precautionary labeling program is inclusion of warnings for chronic health hazards that potentially might arise from improper use and/or exposure to the involved hazardous chemical substance. This policy concerns the hazard warnings that should be used for those hazardous chemical substances that have demonstrated carcinogenic potential.

Some state governments and the Federal Government have exercised authority in mandating hazard warnings for hazardous chemical substances demonstrating carcinogenic activity. This policy will supplement and not supplant such authority.

Precautionary labeling is a part of our product safety program furnishing customers with information about the potential hazard and the safe handling of our products and this policy is merely an extension of our Precautionary Labeling Policy.

The labeling of carcinogens are treated as a special class for several important reasons; they have a long latency period before the adverse effects are observable and the determination of material possessing carcinogen potential is complex and requires the judgement of trained professional toxicologists and/or doctors. Proper product labeling is essential for the safe use of hazardous chemical substances including carcinogens and products demonstrating potential to cause other chronic health hazards.

The purpose of this policy is to provide a basis for management programs to identify potential carcinogen materials and provide for their uniform labeling.

The Corporate Product Safety Policy states:

"Union Carbide will:

"Regularly review product safety information and in the light of new experience of Union Carbide and others, - - - and, if appropriate, - - - , modify the product safety communications."

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It further states:

"Comply with all applicable governmental laws and regulations relating to product safety."

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POLICY

1. The component Product Safety Director in conjunction with his component Medical Director and Industrial Hygienist, shall be responsible for submitting candidate chemical substances and mixtures to the Medical Departments Toxicology Assessments and Advisory Committee (TAAC) for review of their carcinogenic potential.
2. Such candidate lists shall also be forwarded to the Product Safety Communications Committee to ensure that all components are aware of the pending TAAC review.
3. Recommendations as to the classification of a particular chemical substance or mixture developed by the TAAC shall be communicated to the HS&EA Health Effects Review Branch (HERB) for their consideration and action.
4. HERB shall develop action plans to implement decisions regarding a particular chemical substance or mixture including classification for precautionary labeling and/or exemption from labeling for a particular mixture if a carcinogenic substance is present as an ingredient or impurity at such low concentrations that it does not present a significant chronic hazard.
5. The action plans by the Health Effects Review Board shall be communicated to all interested Union Carbide Corporation groups including the affected component Product Safety Managers and the Product Safety Communications Committee.
6. All government mandated carcinogen labeling requirements will be compiled with and in the event that the Union Carbide Corporation labeling requirements is different, the affected operating component may meet either requirement at its option.
7. Products which have been evaluated by TAAC and HERB and found to have a carcinogenic potential shall be placed in one of the following categories and the precautionary labeling shall contain the appropriate hazard warning statement:

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CORPORATE PRODUCT SAFETY MANUAL

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CATEGORY

Known Human Carcinogen

Suspect Human Carcinogen

Animal Carcinogen

WARNING STATEMENTS

Human Cancer Agent

Suspect Cancer Agent

Has caused cancer in
laboratory animals

8. The elements of the precautionary label of carcinogens shall be placed as follows:

- (a) Signal Word: Label will have Signal Word appropriate to most significant hazard. If cancer is the major risk WARNING is the appropriate Signal Word.
- (b) Placement: Directly following Hazard Statement for the most immediate and serious risks (such as flammability, poisoning and serious burns); or directly under product name if no more serious product hazards are involved.
- (c) Name: Known or Suspect Human Carcinogens or Animal Carcinogens must be designated by their common or usual chemical name which may be in addition to trade or code names.
- (d) Precautionary Measures: Appropriate list of precautions depending on whether risk is from skin absorption, inhalation and/or ingestion.

SCOPE

This policy applies to all parts of UCC except to products and services of the Nuclear Division regulated by the Department of Defense, Department of Energy or Nuclear Regulatory Committee and to all affiliates worldwide in which UCC has a greater than fifty percent equity interest and is recommended for application in affiliates of fifty percent or less equity interest.

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