

April 14, 1953

AIR MAIL

Mr. T. R. A. Bevan

The Associated Ethyl Company Limited
20 Berkeley Square
London, W.1, England

Dear Ray:

Your letter of March 24 clarifies the situation with respect to the labeling of containers and pumps used in the distribution of leaded gasoline in Addis Ababa and elsewhere within the areas in which your activities are carried out. Incidentally, I believe that you will recognize why I wrote to Philip Boyd instead of yourself on this matter, in view of my wish to bring everything of hygienic significance to his attention. I would have done well to have sent you a copy of my letter, but I feel quite secure in the knowledge that all such matters will have appropriate handling in your organization and I do not always concern myself with procedure.

The entire question of the marking of containers and dispensing equipment has come up for discussion here from time to time, and there has been a feeling that it serves little useful purpose. To this I should be inclined to agree but for certain considerations which I undertook to make clear lately in a memorandum, prepared for a specific purpose, a copy of which I am sending to you herewith. I have felt obliged, for the reasons indicated, to combat an attitude of laissez faire on the one hand, and a positive antagonism to the procedure, on the other. This memo is not strictly applicable to your situation, as you will recognize, and it involves no criticism of your activities in this regard, which, as you have described them, seem to me to have been entirely correct and realistic, not only under the conditions created by the war, but since. The conditions on this continent, as you know, are different in a number of respects.

The problem, as I see it, so far as your policies and procedure are concerned, hinges upon certain unpredictable considerations, including future developments, with special emphasis on the concentration of lead in your gasolines. The relatively low concentration of lead in the gasoline in the United Kingdom is certainly a point in favor of continuing in your present manner, and, of course, the position taken by the authorities frees you from any fault in your dealings with them. I am not convinced, however, that this is a desirable situation. If non-leaded gasoline were available for the uses for which it might well be substituted

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for leaded gasoline (as in lamps, stoves, torches, cleaning fluids, various solvent usages, etc.), the provision of signs to urge that leaded gasoline should be used only as a motor fuel would be pertinent. But if none other than leaded gasoline is available, this becomes entirely pointless. I do not know the situation in your country well enough to pass judgment, but I feel confident that we, in this country, need to be kept aware of the fact that leaded fuel should not be used for these purposes, and that non-leaded gasoline is a necessity on the market. I know of one instance in which high octane gasoline was proposed for use in a lithographing establishment in the form of a spray at every operator's stand. I headed it off without creating a serious issue, but only because a person of responsibility thought to or was advised to write to me for advice. This is the type of incident that I fear when there is nothing to suggest that there is any difference between leaded and non-leaded gasoline in the public mind. Moreover, here, under conditions in which this industry is largely responsible for its own provisions, with respect to public safety, I fear any let down of the precautions, since these tend to lead to general disregard of any precautions, including those which relate to the permissible concentrations of lead in gasoline. If only wise and well-informed people conduct the gasoline business and the tetraethyl lead business, we shall be all right, in all likelihood, but what is the situation otherwise of an unregulated business? So long as no trouble develops, all is well, but if trouble occurs, then the responsible authorities, who were easily convinced that no trouble could occur, become equally convinced that it cannot be prevented by other than drastic measures. That is to say that the quantitative aspects of public safety never seem to be considered realistically, on either the one side or the other. Of course, legislation by our state governments is a serious problem, which colors my thinking. For this reason, I favor (certainly in the U.S.A.) the policy, within the industry, of taking care of one's own problems on the basis of the best information that can be obtained.

With respect to the problem of the illiterate, and that of other language difficulties, I appreciate the dilemma with which you are faced. It does seem to be stupid to go through the motion of issuing precautions that do not reach the minds of those to be warned, and especially under circumstances that indicate that the warning generally is unnecessary.

All of these matters, plus the abeyance of the conventional labeling procedure for the past ten years, provides you with a unique situation. I must admit that I do not have the answer to it. Of one thing, however, I am quite sure. You and your associates and the responsible oil company people know your own situation better than I do. I should certainly feel that I had gone beyond my proper province if I were to urge your adoption of policies which you consider unsound. I can only suggest, therefore, that it may

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wise to reconsider this matter once more, to appraise the obstacles as carefully as possible, and then to come to a decision. If you decide to sit tight, you should adopt a watchful attitude so as to be able to alter your policy and procedure in advance of a statutory requirement in any of the countries in which you operate. In the United Kingdom you are always in position to discuss the matter in complete good faith. This may not be the case elsewhere.

Sincerely yours,

Robert A. Kehoe, M. D.

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