

Johnson & Johnson

BABY PRODUCTS COMPANY

NEW BRUNSWICK, N. J.

February 8, 1977

SUBJECT: Talc Publicity

Mr. J. Murray

Jim, this comments on your document outlining theoretical questions and answers on talc. I delayed responding until I could see George Lee's technical review so that overlap could be avoided. You will quickly see in my response that I am an opinionated stinker. I genuinely believe that what you have basically done here has made excellent sense. I think your questions are really tough in some cases. That's great because it taxes us to be prepared with terse, factual, convincing responses. I believe you have answered them that way in most all cases. My suggestions, where I have them, generally fall in the area of tone. My personal sense of things is that we need to respond crisply and positively and that we should stamp out any sense of defensiveness or generalization wherever possible. With that in mind, I make the following comments and suggestions:

1. Is JBP pure? I think as George adjusts this statement, it is basically fine. I would suggest we don't mention where our mine is located (Vermont) because of the recent erroneous publicity reported in the Wall Street Journal involving talc mines in that area.
2. Is JBP safe to use? I find the response a little defensive. I wonder if a simple yes might not due.
3. How do you explain the allegation that asbestos fibers have been found in talc? I wouldn't state that "it may be true that minute amounts of some asbestos type minerals have been found in some non-industrial talcs". I'd refer to the follow-up statement by the Mt. Sinai Department Head in which he clarified that the trace amounts of asbestos fibers were found in old product. And, since then, refining methodologies have ended this situation. The FDA has been sampling today's powder products and finds them free of asbestos. Mt. Sinai finds baby powder safe and valuable.
4. How could asbestos possibly get into talc in the first place? I'd continue to use the term "industrial grade talc" in your responses.
5. What is the difference between industrial and cosmetic talc? I'd try to dramatize the difference by responding that industrial talc is so different from cosmetic grade talc that it should be renamed because "industrial grade talc" is really just a group of mixed mineral dusts which often contains less talc than non-talc materials.
6. Can you show me proof that even "pure" talc is safe to use? In answering this question, I would add that there are no studies that we are aware of which demonstrate that normal use of "pure" cosmetic grade talc is anything but safe and valuable to consumers.
7. Has anyone ever died from inhaling too much baby powder? I think this answer is excellent.

8. But shouldn't the amount of powder used be limited to avoid too much exposure? I'd flatly state the answer as no. Further, instead of specifying that the amounts in our testing involve small animals, I would simply end the sentence on the word harmless.
9. Wouldn't it be safer to limit the number of times baby powder is applied during the day? I would start your response by saying, absolutely not. I would also add that after over 75 years of normal use in the marketplace, there is not one instance we're aware of that suggests a need to curtail normal use of JBP.
10. Why isn't talc used on surgeon's gloves anymore? I believe this response is negative. Could we simply say that no foreign substance but those developed for wound healing should be used near wounds.
11. Is baby powder 100% talc? If not, what else is in it? I would begin the response by indicating we can only answer for our own brand.
12. Nickel? Isn't that a harmful substance? I think this response (with a few adjustments suggested by George Lee) is a masterpiece.
13. What good is baby powder, anyway? Why use it at all if there is any question as to its safety? I think the answer is excellent.
14. Why, if there is any question about the safety of talc, doesn't J&J market a substitute such as corn starch? Again, the response is excellent.
15. And, don't doctors seem to think corn starch is safer? I would indicate that some do recommend corn starch. We are convinced, however, that this is largely based on some of the erroneous publicity which has risen out of the confusion people have about industrial grade talc and cosmetic grade talc. Industrial grade talc is a mixture of many mineral dusts which contain some talc. Cosmetic grade talc is 90% pure talc at minimum.
16. Does the consumer have any reason to be concerned about recent reports on the effects of workmens exposure to talc? I believe this response is basically good. I think, again, we have the opportunity to make a clear and concise dramatic differentiation between "industrial grade talc" and "cosmetic grade talc".
17. But, in the recent study, isn't it true that one of the mines studied was J&J's? I kind of feel that the first two sentences are defensive sounding. I would begin by saying that the study was reported on before it was completely analyzed. I would also indicate that we believe, once analyzed, that it will be found to be of virtually no value for the following reasons:
 - Those people tracked in the study may have been exposed to many industrial environments other than talc mining.
 - There was no provision made for understanding whether those in the study were heavy smokers or not.
18. How can you be sure that none of the workers in your talc mines died because of exposure to talc dust? I don't believe the answer helps us deal with the consumer

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safety implications of the use of cosmetic grade talc. I'd mention the problems with the Windsor Study (don't know what dusts the miners were exposed to; don't know if they were smokers or not) and talk of the favorable results found in the Rubino Italian Miner Study.

19. And, have you always mined your own talc? Has it always come from Vermont?
Are other sources as pure? I think this is an excellent response.
20. Could talc from less pure sources than yours be made into a finished product as pure and safe as your baby powder? I think the response here is excellent.

Thank you very much for giving me the opportunity of commenting on your response outline (that will teach you to allow me to nit pick).

S. P. Falk
S. P. Falk

/sa

cc: L. Foster
F. Kniffin
G. Lee ✓
P. Lonergan
B. Semple
W. Waggoner
C. LaRosa

RECEIVED

FEB 9 1977

GEORGE LEE

Attachment