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September 28, 1973

Mr. George J. Dippold
Whittaker, Clark & Daniels
1000 Coolidge Street
South Plainfield, New Jersey 07080

Dear Mr. Dippold:

FDA has finally published a long awaited document concerning asbestos in food and drugs, and, particularly, in talc. We enclose herewith a Xerox copy of this complex document as published in today's Federal Register. The following observations with respect to the published proposals may assist in your evaluation of them.

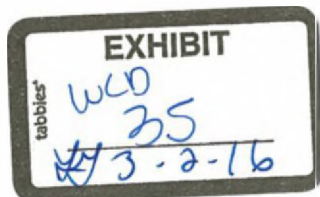
(1) These are proposals, not final regulations. Written comments on all of these are requested on or before December 27.

(2) The proposals, by Center for Science in the Public Interest and by FDA, relate to food and to drugs, but do not relate to cosmetics.

(3) The lengthy and interesting preamble to the FDA proposal establishes FDA awareness of the magnitude of the problem as well as the fact that it is not possible to eliminate all sources of asbestos contact with food and drugs. It also contains helpful scientific references.

(4) FDA concludes that it is not presently possible to issue a final food additive regulation for talc "until a reproducible and accurate method can be specified for compliance purposes."

(5) FDA obviously considered the comments which we filed in your behalf on October 12, 1972, in amending both its GRAS list proposed wording and its proposed food additive regulation for talc. Note that these no longer speak in terms of "free of asbestos-form particles." Also, FDA, in the preamble, describes with greater accuracy the meaning of "asbestos", though the term is still not fully defined.



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Mr. George J. Dippold

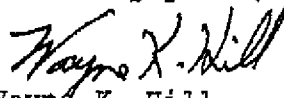
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(6) Note that comment is requested not only on the new proposed regulations but on all aspects of the public health significance, the need for use of asbestos-containing filters, the time needed to switch over to other types, and on methods of quantitative assessment.

Please consider the enclosed and let me know if it is your desire to file further formal comments on these new proposals. If so, I believe it would be necessary for us to meet with your technical personnel in order to appropriately plan proper comments which, you will note, will become part of the record available for public inspection.

Best wishes,

Sincerely yours,


Wayne K. Hill

WKH:vr

Enclosure

cc: Mr. Frederick F. Roesch