

file trace - trace metals

Johnson & Johnson

BABY PRODUCTS COMPANY

RARITAN, N. J. 08869

January 28, 1977

Mr. Arnold H. Netherwood
Johnson & Johnson, Ltd.
Southampton Road
Cosham Portsmouth Hants
PO6 4RL, England

Dear Arnold:

This is my personal and confidential opinion on requests for contaminant levels per your questionnaire on EEC Cosmetic Directive which you circulated corporately as of 12/13/76. I refer only to talc and dusting powders.

Firstly, we do not have sufficient information to accurately answer the questions because we have never really subjected our finished products to sophisticated analyses for the items in your total list. Our detailed trace components in the dusting powder areas has been only on talc as opposed to finished compounded products.

Two things we know, however, are that limits for Arsenic should be 3 ppm max. and for Lead, should be 20 ppm max. Those limits reflect back to our raw material spec. limits (and CTFA) and it would be appropriate to expect our finished powder items to conform to those limits.

It is possible that Beryllium might be present but I would expect it to be sub-trace, e.g., one part per million or less. Selenium can exist in some talcs and Thallium also, possibly in the below 5 ppm range. We have insufficient information to propose a number limit on those elements.

Chromium can exist in our talc here in the States and it shifts around somewhere from 100 ppm to possibly up to 1000 ppm.

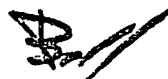
All other materials in your list would be expected to be absent but of course we have no documented data on that.

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The problem inherent in your questions is that no one today can say there is a zero amount of any component unless the methodology is detailed with it. I hope your groups over there fully comprehend that, when they get around to an agreement on the entire matter. Just to bring the thing into focus: a good analyst will get almost zero for a chromium content in talc using an acid leach recipe but might find up to 1000 parts per million with atomic absorption.

Sincerely yours,



W. H. Ashton

/by

cc: G. Lee
M. B. McTernan
W. C. Waggoner