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The Cosmetic, Toiletry and Fragrance Association, Inc.

1133 16th STREET, N.W., WASHINGTON, D.C. 20005 - 202/331-1770 - TELEX 89-2673

James H. Morrill
President

Norman F. Estrin, Ph.D.
Vice President - Science

March 15th, 1976

Mr. Heinz J. Eiermann
Food and Drug Administration
200 C Street, S.W.
Washington, D.C. 20204

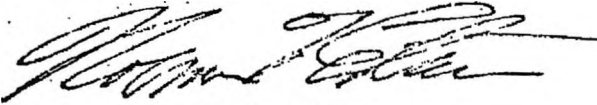
On March 11th, 1976, Mr. Eiermann --

-- the CTFA Talc Subcommittee met to discuss the current status of talc. It was recognized that a need exists to bring to your attention a profile of the analyses for asbestos form materials in talc used in the U.S. production of cosmetics and toiletry products.

The attached letters demonstrate responsibility of industry in monitoring its talcs. We are certain that the summary will give you assurance as to the freedom from contamination by asbestos form materials of cosmetic talc products.

Individual companies are more than willing to discuss the detailed data with you at your convenience.

Cordially,



Norman F. Estrin, Ph.D.
Vice President - Science

NFE:jj
Attachments

Johnson & Johnson

BABY PRODUCTS COMPANY

NEW BRUNSWICK, N. J. 08903

March 15, 1976

Dr. Norman F. Estrin
Vice President - Science
Cosmetic, Toiletries, and
Fragrance Association
1133 15th Street, N.W.
Washington, D.C. 20005

Re: Examination for Asbestos In Talc

Dear Dr. Estrin:

The talc which is used by Johnson & Johnson is solely derived from its own mine in Vermont, where the ore is mined selectively and then beneficiated by the process of flotation.

Shipments of this highly purified talc are routinely examined by our own laboratory to verify the absence of asbestos minerals.

Historically, Johnson & Johnson has always been concerned about the mineralogical integrity of its talcs and even its earliest specifications have required the examination for acicular particulates. When it was erroneously reported in 1971 that our powder contained asbestos, we sponsored a scientific seminar of mineralogical and analytical experts for the FDA to prove that our talc is not contaminated with asbestos. At that time numerous samples were analyzed by experienced consultants such as McCrone Associates, Colorado School of Mines, Professor F. D. Pooley (of the University College, Cardiff), Professor G. Brown (of Princeton), and Professor M. Buerger (of M.I.T.). These examinations included X-ray diffraction analysis, differential thermal analysis, and transmission electron microscopy.

During the period December 1972 to October 1973, 93 lots were individually sampled and examined by X-ray diffractometry for the presence of asbestos minerals. No amphiboles or serpentine minerals were detected in any sample.

Dr. N. F. Estrin
C.T.F.A.

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March 15, 1976

Beginning in October 1973, differential thermal analysis was added to our specified requirement. Both, differential thermal analysis and X-ray diffractometry were instituted for the routine examination of sequential lots. A further 100 lots have since been examined, applying both methods to each sample. Again, no amphibole or serpentine minerals have been detected.

I would like to advise that we are continuing to employ differential thermal analysis and X-ray diffractometry in the examination of sequential lots for the detection of amphibole and serpentine minerals.

It should be pointed out that we also maintain a worldwide monitoring of talcs used by our Johnson & Johnson affiliates, employing these same techniques.

Finally, let me add that periodically, we also submit sub-samples for Transmission Electron Microscope examination and these have always verified the absence of asbestiform minerals.

It is our understanding that you would wish to submit this information to the FDA. Please regard this letter as non-confidential.

Sincerely yours,

George Lee
Director of Applied Research

GL/mm