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H.M. Chief Inspector of Factories,
Ministry of Labour & National Service,
Factory Department,
St. James's Square, London, S.W.1.

Thursday,
4th October
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Dear Sir,

Asbestos Insulation aboard Ships

Our Subsidiary Company, J. W. Roberts Ltd. of Leeds, have sent to us your letter issued in August headed as above, since questions relating to the Asbestosis Regulations are dealt with by Turner & Newall Ltd. when any question of principle is involved. Your letter has been carefully considered and I have been asked to write to you with regard to the following points.

1. First it is necessary to explain that no insulation work on board ship is carried out by J. W. Roberts Ltd. It is our Subsidiary Company, Newalls Insulation Co. Ltd. of Washington Station, Co. Durham, who do so, and they effect all forms of insulation.

2. J. W. Roberts Ltd. of Leeds are only concerned as being the holders of the asbestos Spray Machine patents, and the Spray work on board ship is performed, under licence, by Newalls Insulation Co. Ltd.

3. Newalls Insulation Co. Ltd. have carried out insulation work on board ship (and on land) to a very substantial extent for some 35 years, and no single case of asbestosis has ever occurred amongst their employees. We are satisfied therefore that, except perhaps to a slight extent in the case of the Spray machines, there is no risk of asbestosis in relation to the work they perform.

4. As regards the Spray machines, it is similarly of interest to note that, though the process was patented as long ago as 1931 and has been operated to an increasing extent and very substantially during the war, no asbestosis cases have occurred.

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5. We think you will agree, and are sure that Dr. Merewether will confirm, that Turner & Newall Ltd. and its various Subsidiary Companies have always been more than willing to take all appropriate steps to lessen the risk of asbestosis and therefore have, whenever possible, adopted any suggestions made by any of the Factory Inspectors concerned or by Dr. Merewether. In consequence of the preventive measures taken during the last ten years or more we think it will eventually be found that the number of cases of asbestosis will show a satisfactory decrease, and in fact we are hoping, as regards employees first employed within recent years, that we will find eventually that in our case the disease has disappeared.

   Our statistics show that as regards practically all cases of asbestosis which have already arisen they are in respect of employees with many years service and who were therefore employed before the Asbestosis Scheme was established in 1931, when comparatively few preventive measures existed; the average age of our asbestosis cases when suspended is 45 years or more and the average length of their employment in the industry, when suspended, is over 17 years.

6. While we take the view, as stated above, that as regards insulation work on board ship mentioned in your letter, no risk of asbestosis arises generally in connection with heat and sound insulation, we appreciate that in the case of the Asbestos Spray process (as at present operated) there may perhaps be some slight risk, and accordingly appropriate arrangements were made some time ago as regards the use of respirators, the non-employment of juveniles, and so on. We are confident that Newalls Insulation Co. Ltd. already take appropriate measures to lessen what asbestosis risk there is.

   In this connection, I have been asked to tell you that J. W. Roberts Ltd., as the holders of the patents, have been for some time investigating the use of pre-damped fibre in the Spray machines, so as to eliminate the dust; these investigations appear to have been successful and a patent application has already been lodged. At any

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convenient opportunity J. W. Roberts Ltd. would be very pleased to demonstrate this invention to you and Dr. Merewether.

7. Dealing next with the six points mentioned in your letter, I think I can say that except as regards No.3 no difficulty arises and that in general we are already acting in accordance therewith.

8. As regards your suggestion No.3 as to the provision of a respirator for each workman engaged in the fitting or removal of any dry insulation material containing asbestos on board ship, I have been asked to point out that in our view such action is quite unnecessary, and of course if any such action were taken it would mean in effect a very wide extension to the present Asbestosis Regulations. As you know, the Regulations apply in general to manufacturing processes only and do not in any way apply to the finished goods, and in this connection it is very significant that our experience in the past has shewn that no cases of asbestosis have arisen amongst employees handling and applying finished products. Also it should be noted, in passing, that a large proportion of the insulation products used on board ship are mainly composed of magnesia with at most 15% asbestos, and that other insulation products contain no asbestos at all.

9. Your letter indicates that the question of strengthening the Regulations will arise if, as regards workers engaged on heat and sound insulation work on board ship, "the risk is found to continue", but in our view no such risk at present exists or, if at all, only to a completely negligible extent. That this is so is borne out by the fact that (according to our records here) all our asbestosis cases have been among actual factory workers, engaged continuously for many years in the scheduled processes themselves. The fact that Newalls Insulation Co. Ltd. and their predecessors have carried out insulation work on board ship continuously and on a very

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large scale for 35 years, and that no asbestosis cases have occurred amongst the large number (no doubt several thousands of men during that period) engaged on this work is we feel most significant.

Yours faithfully,

for TURNER & NEWALL LIMITED,

JLC/VK
ROS/CW

Secretary.