

May 28, 1969

Mr. James A. Trodden
Federal Trade Commission
26 Federal Plaza
New York, New York 10007

Dear Mr. Trodden:

After our conversation of this morning via the telephone, and after sending you the reprint of "The Harben Lectures for 1960," it occurred to me that I should comment in writing on one or two aspects of the matter which you brought to my attention. I do not like to speak with the voice of authority on matters with which I am not fully informed, and I am equally reluctant to be responsible for inveighing against practices which may be harmless, especially when they can be investigated so as to reveal their capacity for harm. Accordingly, I would like to raise certain pertinent questions. Let me preface them, however, with the statement that I see no reason for introducing unexplored hazards into the homes of the land, or into milady's wardrobe, and especially into the environment of infants and small children.

1. Several questions which I ask for information as to the procedure for coloring the fur, are the following: How is the procedure carried out, whereby lead is added to the fur? What are the proportions of lead (Pb) in the solution with which the fur is treated, to the weight of fur being treated? Is the fur then simply dried, or is it rinsed off or brushed off? Is the treatment carried out one time only, and if so, for how long? Or is the fur treated repeatedly?
2. Now as to the condition of the lead in or on the fur, I'd like to have any information that is available. If such information is not available, it should be obtained by reliable investigators. (I would presume that technical personnel have worked out the processes, and that they know what they are doing.) How can the lead in the fur, as marketed, be removed? Does brushing dislodge any of it? Do the hands become contaminated with lead by merely handling or running the fingers over or through the fur? Is the lead extractable by the use of water or other liquid, or is it bound fairly firmly to the hair?

The above questions are crucial. If the lead reacts with the sulfur in the hair and is tightly or fairly tightly bound to the hair, and if no excess of unreacted lead remains on the hair to be dislodged mechanically into the air or upon the skin or other clothing, there is probably little to fear. It is even likely that under these conditions very little would be extracted by a child who sucks on the fur. However, it will not do to guess at these matters. The facts can be and should be determined.

It seems likely that there is some proportional quantity of lead which reacts with the hair and is not readily dislodged or extracted. Certainly, the people who treat furs in this manner should know something about these matters. The treatment of human hair with preparations which contain lead and acetic acid has been

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practiced for centuries. I would suppose that the knowledge of this traditional practice has been responsible for the dyeing of furs. I would suppose, also, that some test of the ease of extracting lead from fur could be carried out in a manner comparable to that of testing of the extraction of lead from the glaze of table- and kitchen ware.

Finally, in view of the questions which you have brought to my attention, and also because of those which I have raised, I should think that those who employ this method of treating furs, in order to give the product some presumably desirable appearance, should be asked to present evidence as to why this process and these products should not be condemned on the grounds of the potential hazard to the purchaser wearing and handling such furs and of bringing them into the environment of infants and young children. If the process is both good and safe, it should be possible to so demonstrate. I am not speaking here in the terms of law, for I am not familiar with the laws, if any, which apply in such a situation, but rather in the terms of preventive medicine. There are now too many insufficiently controlled hazards in American homes, and I do not like to see them increased. On the other hand, we should know what hazard is real and what is purely hypothetical.

Very truly yours,

Robert A. Kehoe, M.D.
Professor Emeritus of
Occupational Medicine

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