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BABY PRODUCTS COMPANY

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NEW BRUNSWICK, N. J.

September 15, 1975

GEORGE LEE

SUBJECT: Non-Respirable Talc for
JOHNSON's* Baby Powder

To: Mr. D. D. Johnston

Up to the present, our scientific resources have concentrated on the development of techniques and data (1) to demonstrate that our powder is free of asbestos and (2) to support our contention that under normal product-use dust exposure concentrations, talc of J&J purity should not present health hazards.

Despite our comprehensive presentation to the FDA-OTC Antiperspirant Panel during its July 9th review of talc safety, the Panel gave talc only a "qualified" approval for its use in aerosol antiperspirants. It concluded "that the use of talc in antiperspirants constituted only a small portion of the potential problem with talc in the environment in view of the much larger experience accompanying the use of baby powders" (sic). The question of the safety of talc in products, other than antiperspirants, is yet to be dealt with by other OTC Panels. At a future date there could be further new safety issues raised concerning suspected inhalation hazards of associated minerals and metals, as evidenced in the questioning statements by Dr. A. Miller of Mt. Sinai during the antiperspirant hearings. The recent new issue of USP has introduced for the first time, a "do not inhale" talc warning. We also expect controversial talc impurity data to be presented by Dr. Langer at the upcoming Edinburgh International Symposium.

It is obvious that the entire safety issue concerning inhalation hazard could be negated by presenting a talc which is devoid of or contains significantly fewer respirable particles. The approach of having Windsor Minerals produce a "low respirables talc" has long been advocated by Research. To our best knowledge, competitive talc producers have been wholly complacent in the development of safer talcs. In view of resurging consumerist concerns with talc inhalation hazards, we would urge Windsor Minerals to give this development its immediate and highest priority. This development would provide J&J with a unique product position which would protect an important franchise as well. This seems especially timely as the CFTA moves towards a weaker talc standard and we may be forced to dissociate Baby Products Company from other cosmetic talcs.

I plan to pursue this with Ted and Roger on my return, and would like your comments.

D.R.P.
D. R. Petterson

DRP/mm

cc: E. West
G. Lee

R. Miller
R. Stites

JNJ 000235206