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AUSTRALIAN OCCUPATIONAL HEALTH MANAGEMENT
BY FACSIMILE

27 September 1990

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Dear Mr Mengler,

CSR Limited and Robert Culkin

Thank you for your letter of 26 September together with the additional material from Mr Coles and Professor Warren. My comments are as follows:

Warren - I agree with the conclusions reached on page 4 of the report.
I would like to emphasise also the point which I made at the meeting with Mr Zelestis and Mr Carter in Perth on 4 September (and did not mention in my notes to you) concerning Professor Warren's finding of "several focal areas of squamous metaplastic change of his columnar epithelium of his bronchi (not denied by Dr Shilkin). This indicates continuing damage to his bronchial epithelium often found in smokers". This was reported in slightly more detail on page 8 of Professor Warren's original report and suggests to me that Mr Culkin may not have totally given up smoking all those years ago.

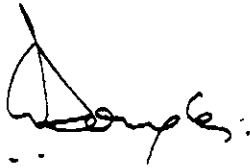
Coles - The Department of Employment Technical Data Note 42 supports my point about the application of the 1969 Asbestos Regulations. In particular, the section headed "Interpretation" is most relevant to Culkin's work at the CSR refinery.
From 1973 until 1979 I was employed as an Employment Medical Adviser in the UK Health and Safety Executive and worked very closely with the Factory Inspectorate. Prior to 1973 the Employment Medical Advisory Service was actually within the Factory Inspectorate and the doctors were Medical Inspectors of Factories. I therefore feel that I am well qualified to comment on the official attitude that was taken to the type of work done by Culkin. Because of the intermittent nature of Culkin's exposure to asbestos the relevant interpretation would have been: "When considering the need for precautions, discretion is possible if the activities are only occasional and for short duration".

The other papers from Mr Coles are concerned with asbestos in HM Naval Dockyards in Britain. The workplaces have little relevance to the work done at a sugar refinery. The work at the dockyard concerned sprayed crocidolite and asbestos (probably crocidolite) lagging being removed or modified in naval warships. Even the work described as "minor lagging/delagging" would have been high exposure when compared with Culkin's exposure, and more comparable to that of the ladders which were brought into the sugar refinery for specialised insulation work.

It is interesting to read that even in Naval Dockyards, "because the full extent of the hazard associated with asbestos was not appreciated, adequate preventive measures were not introduced into Naval Dockyards until 1967. Various amounts of asbestos debris were left scattered about the ships for most of the refit periods (sometimes up to 3 yr)".

Please contact me if you require any further comments or information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Douglas', with a stylized flourish at the end.

Dr David Douglas