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April 13, 1972

Division of Colors and Cosmetics Technology
Office of Product Technology
Food and Drug Administration
Washington, D.C. 20204

Attention: Dr. John M. Gowdy
Assistant Director for Medical Review

Dear Dr. Gowdy:

I am writing in reply to your letter of April 6, about the FDA's studies on talc and asbestos containing products.

It is apparent that no epidemiological or toxicological studies are being performed by FDA on talcs without asbestos. It also appears that, although the FDA could probably require labeling of asbestos-containing products (such as building materials sold to homeowners in hardware stores) under the Hazardous Substances Act, this course is not being actively pursued. I don't know of another U.S. government agency which has responsibility for requiring labeling of hazardous substances on the consumer market or banning the use of hazardous products.

I am concerned about the availability of unlabeled asbestos products to the public. I am also disturbed about the use of talc, a suspected carcinogen, as a major constituent in cosmetic powders and perfumed vaginal sprays (its use in dusting surgical gloves has been discontinued).

The National Institute for Occupational Safety and Health has recommended that asbestos containing materials used industrially bear a hazard label (in "Criteria for a Recommended Standard . . . Occupational Exposure to Asbestos", February, 1972). It is possible that in adopting a new standard for occupational exposure to asbestos, the Labor Department will require the labeling of asbestos-containing products used by the labor force.

Nonetheless, even if the Labor Department requires labeling of some asbestos products, the problem of labeling other asbestos products on the consumer market will remain. The problem of evaluating the hazards of specific products in the light or darkness of present knowledge, and then deciding if these products should be withdrawn from the market (do-it-yourself home boiler insulation of asbestos, talc vaginal sprays, asbestos filters in processing foods and drugs, asbestos "binder" in cigars, etc.) - will remain. Correct

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me if I am wrong, but isn't this the responsibility of the Food and Drug Administration?

Very truly yours,

BDC

Barry T. Castleman
Technical Services Section
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Bureau of Environmental Services

BIC/cmm

CC: Senator Charles M. Mathias
Representative Paul S. Sarbanes