

Manufacturing Chemists' Association, Inc.

Minutes of Meeting
LABELS AND PRECAUTIONARY INFORMATION COMMITTEE
Sheraton-Park Hotel -- Washington, D. C.
January 28-29, 1958

The meeting was called to order at 9:30 a.m. on Tuesday, January 28, 1958.

MEMBERS PRESENT

J. B. Williamson (Chairman), American Cyanamid Company
N. M. Walker (Vice Chairman), Pennsalt Chemicals Corporation
George E. Brewer, Shell Chemical Corporation
J. H. Foulger, M.D. (Wed. Only), E. I. du Pont de Nemours & Co., Inc.
C. L. French, Mallinckrodt Chemical Works
J. T. Fuess, Eastman Organic Chemicals Dept., Distillation Products Industries
S. J. Hill, E. I. du Pont de Nemours & Co., Inc.
Edward J. Hogan, Allied Chemical & Dye Corporation
Frank S. Low, Food Machinery and Chemical Corporation
H. H. McIntyre, The Dow Chemical Company
R. D. Minter, Monsanto Chemical Company
Thomas W. Nale, M.D., Union Carbide Corporation
R. G. Troup, J. T. Baker Chemical Co.
John B. Tuttle, Enjay Company, Inc.
J. S. Walker, Hooker Electrochemical Company
J. D. Kittelton (Secretary), Manufacturing Chemists' Association, Inc.

PLAINTIFF'S
EXHIBIT
CMA-244

GUESTS

R. E. Bradshaw, Olin Mathieson Chemical Corporation
Daniel W. Byles, Vick Chemical Company
A. G. Cranch, M.D., Celanese Corporation of America
R. H. Dewey, Commercial Solvents Corporation
J. E. Flanagan, Jr., Robert A. Taft Sanitary Engineering Center
George Hopper, Procter & Gamble Company
O. A. Mooney, Food Machinery and Chemical Corporation
R. F. Philpitt, Olin Mathieson Chemical Corporation
F. L. Rider, Stauffer Chemical Company
Dr. C. B. Shaffer (Wed. A.M.), American Cyanamid Company
F. D. Sparre, E. I. du Pont de Nemours & Co., Inc.
E. M. Swisher, Rohm & Haas Company
L. J. Waldbaur, M.D., General Aniline & Film Corporation
E. L. Weinburg, General Aniline & Film Corporation
General J. E. Hull (Tues. A.M.), Manufacturing Chemists' Association, Inc.
Frank H. Carman (Tues. A.M.), Manufacturing Chemists' Association, Inc.

The Chairman, Mr. Williamson, welcomed the guests who were present at the meeting and stated that the LAPI Committee was especially pleased to have General Hull and Mr. Carman present.

1.1 Appointment of Nominations Subcommittee

Mr. Williamson reminded the Committee that his term of office would expire June 1, 1958. For that reason he appointed a Nominations Subcommittee, consisting of Messrs. Minter and Low to report to the next meeting of the Committee with recommendations for individuals to serve as Chairman and Vice Chairman for the term 1958-60.

1.2 Industry Subcommittees

(a) Pesticide Subcommittee

Mr. Sparre, Chairman of the Pesticide Subcommittee, reported that a meeting of the group had been held the previous day, January 27, and that seven of the nine subcommittee members were present. Most of the meeting was devoted to a discussion of the LAPI Manual and the current state statutes and regulations on labeling. The subcommittee also discussed Interpretation #18 issued by the U.S. Department of Agriculture. The next meeting of the subcommittee is scheduled for Tuesday, April 1, 1958.

The Chairman instructed the Secretary to insert in the Minutes the names of the members of Mr. Sparre's subcommittee. These are as follows:

F. D. Sparre, Chairman, E. I. du Pont de Nemours & Co., Inc.
J. R. Noone, Secretary, National Agricultural Chemicals Association
G. A. Brandes, Rohm & Haas Company
J. P. Frawley, Hercules Powder Company, Inc.
Leo R. Gardner, California Spray-Chemical Corporation
Henry Moras, Stauffer Chemical Company
R. F. Philpitt, Olin Mathieson Chemical Corporation
H. D. Tate, Naugatuck Chemical Division, U. S. Rubber Company
Alternate: T. W. Reed (for Leo R. Gardner) California Spray-Chemical Corporation

(b) Other Subcommittees

The Committee discussed the plans of Messrs. Minter and Williamson for reorganization of the LAPI Committee. Both believe that some new subcommittees should be formed in addition to a possible enlargement of the parent Committee. The idea of membership rotation was also discussed. Members felt that subcommittees should be established as the need arises, and it was pointed out that, under the Rules of Organization and Procedure, the Committee already has this right.

After this discussion,

It was moved, seconded, and voted

THAT Section 3, Paragraph 3, of the Rules of Organization and Procedure be amended to change the number of members from 15 to 20, with the understanding that the LAPI Committee would have the right to pass upon the qualifications of any additional members who may be appointed.

(This motion carried by a vote of ten to three).

It was then moved, seconded, and voted

THAT no action be taken at this time on the proposal calling for rotation of membership.

(This motion passed with two abstentions).

1.3 Allied Committee Activities

1.3.1 CSMA

Mr. Sanford Hill said that the CSMA Labeling Committee met recently and discussed the Model State Household Products Labeling Bill. Committee members voiced the opinion that we should try to work as closely with CSMA as possible.

Committee members discussed the LAPI Committee's relationship with CSMA and concluded that MCA should retain an interest in labeling legislation relating to household or consumer products. Members felt that this was important since any legislation might later be extended to cover industrial chemicals also.

After this discussion, the following motion was voted:

WHEREAS, many MCA member companies manufacture and sell household chemicals and WHEREAS, any such legislation passed will serve as a model for legislation affecting industrial chemicals,

NOW, therefore, be it moved, seconded and voted

THAT the MCA continue its active interest in legislation affecting the labeling of household chemicals to insure that such legislation follow the principles of labeling set forth in Warning Labels, Manual L-1.

Committee members further discussed our relations with OSMA and voiced the opinion that it would be desirable for MCA and CSMA representatives to meet occasionally as they did recently in Philadelphia.

1.3.2 API

Mr. Tuttle said that the API had approved the publication of their manual on labeling. This should be available soon from API, and Mr. Tuttle will see that each LAPI Committee member receives a copy.

Mr. Tuttle said that at the last meeting of the API Labeling Committee, the matter of API approaching ASA was discussed. Mr. Elmer Mattocks was asked to discuss with ASA the publication of the API labeling manual as an ASA Standard. Mr. Mattocks has done this and has found that it will be necessary to use the Sectional Committee Method for revisions of the manual. Mr. Mattocks' report on this meeting with ASA staff members is as follows:

"A conference was held with members of the ASA staff. They agreed that if the API would submit Bulletin 2511 to the American Standards Association, requesting approval as an American Standard, they would be willing to make the necessary canvass and determine if there were any objections to having Bulletin 2511 made into an American Standard. This would be in accordance with their so-called Existing Standards Method.

"The ASA procedure has a requirement which states 'The Sectional Committee Method should be used in cases where, in the opinion of the Council, a Standard is intended to be used as mandatory rules of regulatory bodies having police power.' It is the opinion of the ASA staff that because of this rule, it will be necessary to set up a Sectional Committee to handle revisions to the proposed Bulletin 2511 if it were made an American Standard. While this does not necessarily present a problem, it should be recognized that a Sectional Committee might have to be set up in due time to consider the labeling of petroleum products."

1.3.3 NPV&L

Dr. Foulger attended a meeting of the Legislative Committee of the National Paint, Varnish & Lacquer Association and stressed the importance of precautionary labeling. Plans for the reactivation of their Labeling Committee are progressing.

1.3.4 ACGIH

Dr. Elkins of Massachusetts will talk on the labeling of mixtures at the forthcoming 1958 Industrial Health Conference. MCA has received an invitation to have a spokesman appear who would present the chemical industry's opinion on the labeling of such mixtures. Dr. Nale has agreed to give this talk, and it was suggested that Mr. Brewer's ACGIH Subcommittee supply him with any material they may have, including the report of the meeting with ACGIH representatives. If possible, Dr. Nale would like a copy of the paper presented by Dr. Elkins in advance of the meeting so that he will know how to answer him.

1.3.5 CGA

Mr. Williamson discharged with thanks the Acetylene Subcommittee.

1.3.6 NFPA

Mr. McIntyre reported that there had been a recent meeting of the Subcommittee on Classification of Materials. He stated that the first job of the subcommittee was to define the types of hazards. The subcommittee is considering the system which has been developed by Mr. Duggan of Union Carbide Corporation. Mr. McIntyre will send to Mr. Kittelton for distribution to members of the Committee a brief summary of NFPA developments.

1.3.9 AIHA -- Invitation for MCA to Exhibit at 1958 Industrial Health Conference

The Committee discussed this invitation and directed the Secretary to reply to AIHA, stating that we regretfully decline the invitation due to the fact that the LAPI Committee will sponsor a conference in Houston the week following the AIHA meeting. Since we have only one suitable exhibit, and this will be required at Houston, time will not permit showing it at Atlantic City.

1.3.10 Public Health Service Labeling Committee

Mr. Flanagan reported that this Committee had not held any meetings since the last LAPI meeting. He said that he would talk with Dr. Brady about Public Health Service labeling activities when Dr. Brady visits Cincinnati soon.

1.3.12 Industrial Hygiene Foundation

The Chairman thanked Messrs. Low and Troup for their efforts in manning the labeling exhibit at the Annual Meeting of the Industrial Hygiene Foundation of America.

1.3.13 AAPCO

The Secretary reported that he had given a talk at the Annual Meeting of this Association and that it was well received. Mr. Hill said that the speech will be printed in the proceedings of the meeting.

1.3.14 APHA

The Committee discussed a recent resolution of this association which members had received. It was agreed that it would be desirable to acquaint APHA with the LAPI Committee's efforts in the field of precautionary labeling. Dr. Nale agreed to do this, and the Secretary will send to him a copy of Mr. Williamson's speech which was presented before the Drug Trade Conference, a copy of the CSMA Model Labeling Law, and copies of the three Federal bills which have been

introduced on the subject of household product labeling.

2.0 INTERNATIONAL

2.0.3 ABCM -- Plans for Visit of British Representatives

The Secretary reviewed the plans of Messrs. Stevens and Walmsley to visit the United States. The ABCM representatives would first come to Washington and then would attend the LAPI conference and meeting in Houston. Following this, they plan to visit St. Louis and Niagara Falls and to end their visit with a trip to Canada.

Mr. Williamson suggested to Mr. McIntyre that he appoint an individual to be responsible for the entertainment of the British during their visit at Houston.

2.1 FEDERAL LEGISLATION

(a) MCA Board Action

The Secretary, Mr. Kittelton, reported that the MCA Board of Directors discussed the pending Federal bills and agreed that MCA should not press for hearings. MCA support for the legislation will be made known to interested legislators on an informal basis. Active espousal will be left in the hands of the trade association representing household product manufacturers.

(b) Review of Bills by Counsel

The Secretary reported that Mr. Hobbs had informally considered the pending Federal bills on labeling and had discussed the matter with other company attorneys. It was Mr. Hobbs' opinion, and it was shared by the others, that the bills would definitely increase the Common Law Standard of Care to be observed by the chemical manufacturer. However, this may be outweighed by other considerations, such as the desirability of securing acceptable Federal legislation which would help promote uniformity.

(c) Appointment of Subcommittee to Draft Statement for Submission to Congress if Hearings are held

Committee members agreed it would be desirable to draft a statement in advance of any hearings for submission to Congress when the hearings are held. This statement would support the bills.

The Chairman appointed a subcommittee, consisting of Mr. Nicholas Walker as Chairman and Messrs. Brewer and Fuess as members.

2.2 STATE LEGISLATION

2.2.1 California -- Official Antidotes Booklet

The Secretary distributed copies of this booklet recently to Committee members. Mr. Troup pointed out that there were several inconsistencies in the poison label requirements in this publication and in the General Safety Orders. Mr. Williamson stated that he felt that this was a matter for individual companies to work out with the California authorities.

Committee members said that they had not yet received copies of proposed regulations which Mr. Kittelton distributed to them a few days ago. The Chairman suggested that the members study these regulations carefully and notify him if they thought any action should be taken. Mr. Hill requested that copies of the Proceedings of the 1957 Precautionary Labeling Conference be sent to West Coast officials. The Secretary will take care of this.

2.2.4 City of Chicago

The Secretary recently received a letter from an official of the City of Chicago asking for information on precautionary labeling ordinances. Mr. Williamson reviewed the Secretary's reply and suggested that, in addition to the information which had already been submitted, the Secretary should supplement it by another letter referring to the fact that the State of Illinois has a labeling law covering use of chemicals in industrial employment.

2.2.7 New Jersey

Messrs. Hill and Williamson met with New Jersey officials to discuss a reissue of their labeling regulations. Several changes were pointed out to the officials which should be made in the regulations to bring them up to date with current LAPI Manual requirements.

In connection with the discussion of changes in the New Jersey regulations, Mr. Hill stated that more and more Government officials will want guidance on the subject of precautionary labeling. He felt that there should be a source from which they would be able to obtain such guidance. Committee members discussed this subject thoroughly and concluded that the best way to handle it would be to set up an advisory committee consisting of representatives of associations interested in precautionary labeling. This would include MCA, CSMA, NPV&L, and API.

Following this discussion,

It was moved, seconded, and voted

THAT the Chairman of the LAPI Committee approach the chairmen of the other association committees and explore with them the possibility of forming an inter-association advisory committee on precautionary labeling.

(This motion was passed unanimously).

2.2.11 Virginia

Messrs. Williamson and Kittelton attended a hearing held on January 27 in Richmond on Senate Bill 34. This bill would amend the Virginia Pharmacy Code to require a poison label on all caustic and corrosive substances listed in the Federal Caustic Poisons Act, whether sold at retail or not. In addition, it would require a poison label for any other "poison" without defining what is meant by the term "poison." There also is a possibility that it would require manufacturers of industrial chemicals to obtain a permit from the Virginia Department of Health in order to distribute their products.

At the hearing, Mr. Williamson delivered a statement pointing out MCA's efforts in the field of precautionary labeling and also pointing out the defects in the bill. The Senate Committee Chairman announced that a subcommittee would be appointed to study amendments to the bill. MCA and CSMA were asked to submit to this subcommittee their suggestions for amendments.

Mr. Nicholas Walker was asked to meet with Mr. Ackerly on the second day of the LAPI Committee meeting in an attempt to work out some amendments to S.B. 34. The Chairman asked Mr. Kittelton to follow up on this matter and to attend the subcommittee meeting in Richmond on February 3.

2.2.14 Kansas

Copies of the revised Kansas regulations were distributed at the meeting, and Committee members were very pleased with their contents. The Chairman said that Mr. Minter was to be congratulated for his success in guiding the final form of these regulations.

2.2.18 Washington

Mr. Hill reported that Mr. Walter Poppe had delivered a speech in the State of Washington on precautionary labeling. This talk stressed the importance of Manual L-1, "Warning Labels," and the work of the LAPI Committee.

2.2.22 Connecticut

The Connecticut Household Products Labeling Law, enacted last year, became effective on January 1, 1958; however, to date no regulations have been issued under it.

13

An informal meeting was held in Commissioner Frassinelli's office in Hartford on Monday, January 20. Messrs. Tuttle and Kittelton attended this meeting and represented MCA. Mr. Tuttle reported that the major proposal, which was made by Assistant Commissioner Plank at the time of the meeting, was to use Professor Hodge's book to determine which products require the "Danger," "Warning," or "Caution" signal word. This book is entitled "Clinical Toxicology of Commercial Products" and is published by the Williams and Wilkins Company of Baltimore, Maryland. Mr. Plank suggested that for products which Professor Hodge classifies as 6, 5, or 4, the signal word "Danger" be used. Those classified as 3 "Warning" be used, and those classified as 2 "Caution" be used.

re

The Committee discussed this thoroughly and were of the opinion that Commissioner Plank's proposal should not be accepted. A major criticism of the book is that Hodge considered only oral toxicity. In addition, many of the commercial products classified have had changes in their formulation since the book was published. Mr. Tuttle said that in the case of his own company, several of their products were incorrectly listed in the book.

3
t

Dr. Foulger said that Professor Hodge makes an erroneous assumption; namely, that the toxicity in a mixture is due to the most toxic member of the mixture. Dr. Foulger cited the example of a mixture of carbon tetrachloride with alcohol. In this case, such a mixture would be much more toxic than carbon tetrachloride alone. Dr. Foulger said that Professor Hodge's principle could lead to very serious results since many mixtures might be either considerably more or less toxic than the toxicity of the most hazardous component.

Dr. Shaffer of American Cyanamid Company said that he did not see any objection to using a numbering system to determine the right signal word. However, he agreed that it would be important to include other modes of entry besides oral.

Mr. Tuttle, in writing the Connecticut authorities, was instructed to point out the fallacies of Hodge's book and to inform Commissioner Plank that the LAPI Committee did not favor using the book for precautionary labeling purposes.

Committee members were of the opinion that Mr. Plank may have attached undue significance to the signal word and that he should be convinced, if possible, to de-emphasize the importance of the word.

Mr. Kittelton reported that at the Hartford meeting, he had stressed the importance of including in the Connecticut regulations the MCA table appearing on pages 16 and 17 of Manual L-1. The Committee agreed that this was important and the Chairman suggested that Mr. Kittelton prepare the table for submission to the Connecticut authorities. Mr. Tuttle will prepare a letter and will send it to the Secretary for signature by Mr. Crass or General Hull.

2.2.25 Indiana

Dr. Foulger reported that he had visited recently with Indiana authorities and had suggested to them that they use the ICC classification in determining which products should be labeled as poison. The Secretary stated that Mr. Crass had written a letter to Mr. Sullivan also making this suggestion. An unsatisfactory answer was received but in the MCA reply it was suggested that a meeting be arranged between Indiana officials and MCA representatives.

Mr. Tuttle stated that on December 27 API representatives met with Indiana officials, and Mr. Sullivan stated at that time that he was not using the MCA definition of poison, although it is specifically required by law. Mr. Tuttle said that API had received a letter listing certain products which would require registration. This letter is included as Appendix A to these Minutes.

The Secretary was instructed to write the Indiana authorities informing them that we were sympathetic with their efforts to secure adequate labeling of household products but that we did not believe that the present Indiana law gave them authority to require registration and labeling of the products which they have listed. It was also recommended that he express the belief that manufacturers would strongly oppose any attempt they make to exceed the authority granted them under the law but, on the other hand, would cooperate in helping them work out acceptable amendments broadening its scope. Mr. Dewey stated that he had a number of contacts in the Indiana Legislature and could be of help, if we wished to secure amendment of the Indiana law.

3.0 LABELS -- SAFETY DATA SHEETS

3.61 Picric Acid

The Secretary reported that the General Safety Committee had decided not to proceed with preparation of a safety data sheet on this chemical.

3.64 Mercury and Mercury Oxides

Consideration of a label for these chemicals was deferred pending more information from the General Safety Committee on the status of the safety data sheet.

3.65 Vinyl Acetate

Dr. Nale has prepared a label for this chemical, but consideration on it was deferred by the Committee until the health hazard section of the safety data sheet is available.

3.66 Benzoyl Peroxide

Mr. Williamson deferred appointment of a subcommittee pending receipt of the first draft of the safety data sheet from the General Safety Committee.

3.67 Furfural

Mr. Fuess reported on correspondence he has had with The Quaker Oats Company and stated that this company is now in the process of amending the medical section of the safety data sheet.

The Secretary was instructed to record in the Minutes that the label adopted at the last meeting should be deleted pending receipt of the amended medical section on furfural. The Secretary was further instructed to inform Mr. Stephenson that a label will be submitted to the General Safety Committee after the revised safety data sheet has been received.

3.68 Tolyene Diisocyanate

Appointment of a subcommittee to draft a label for this chemical was deferred pending receipt of a draft of the safety data sheet.

3.69 Boron Hydrides

Appointment of a subcommittee to draft a label for this chemical was deferred pending receipt of a draft of the safety data sheet.

3.70 Isopropylamine

Appointment of a subcommittee to draft a label for this chemical was deferred pending receipt of a draft of the safety data sheet.

3.71 Methyl and Ethyl Acrylates

Appointment of a subcommittee to draft a label for this chemical was deferred pending receipt of a draft of the safety data sheet.

3.72 Phosphorus Pentasulfide

Appointment of a subcommittee to draft a label for this chemical was deferred pending receipt of a draft of the safety data sheet.

Mr. Minter stated that he would be willing to serve on a subcommittee to prepare a label for this chemical. He gave the Secretary a copy of a proposed label which is as follows:

PHOSPHORUS PENTASULFIDE

WARNING! Contact with water or acid slowly liberates poisonous
and flammable hydrogen sulfide gas
Harmful Dust

Avoid prolonged or repeated breathing of dust or evolved gas.

Avoid contact with skin, eyes, and clothing.

Keep container tightly closed.

Avoid friction or rough handling because of fire hazard. Smother
fires with carbon dioxide or sand.

Use only with ADEQUATE ventilation.

The formic and oxalic acid label was referred to a subcommittee consisting of S. J. Hill, chairman; Dr. Aalto, and Mr. Gillet, with the request that they promptly circularize the producers and report back to the M.C.A. Washington office a revised, or agreed upon, label.

The labels on phosphorus and chlorides thereof, and phosphoric acids, were referred to a subcommittee of which T. P. Callahan is chairman, with the request that they circularize the producers and report back to the M.C.A. Washington office on the final labels.

These labels will then be cleared with the concerned container committees and submitted to the LAPI Committee.

IX. CHEMICAL PRODUCTS AGREEMENTS COMMITTEE

The Chairman advised that a meeting of this committee would be held in the near future and that the committee had been requested by the M.C.A. to submit names of any products which were inadequately labelled, or without labels. Such a list will be promptly referred to the LAPI Committee.

X. H. R. 4708

This bill amends Sec. 502 of the Federal Food, Drug & Cosmetics Act to require the label "poisonous if used internally" for substances containing any quantity of boric acid or of any other substance which is poisonous when used internally, and which is similar in appearance to another drug which is for use internally.

It was agreed that this bill should be opposed on the basis that (1) it is unworkable; (2) ample powers exist in the F&D Act to require necessary labels; and (3) it will not prevent carelessness.

XI. ADJOURNMENT

There being no further business, the meeting adjourned.

W. N. Watson

Acting Chairman

Minutes subject to approval.

5.0 REVISION OF MANUAL L-1

(a) Revision of LAPI Definition of "Irritant"

Committee members discussed Dr. Foulger's original proposed revision of this definition, together with later separate proposals made by Dr. Nale and Mr. Williamson.

Following this discussion,

It was moved, seconded, and voted

THAT at this time no change be made in the definition of "irritant" as it now appears in the fourth revision of Manual L-1.

(This motion was carried by a vote of eight to three).

After this voting, another motion was made as follows:

It was moved, seconded, and voted

THAT a subcommittee be appointed to prepare a revision of the definition of "irritant" for possible future use by the LAPI Committee in the event that the need becomes clear to make such a change in the definition.

The Chairman appointed a subcommittee consisting of Mr. J. S. Walker as Chairman and Drs. Nale and Foulger as members.

(b) Report of Subcommittee on Item 8, Page 11, of LAPI Manual

Mr. Fuess stated that he did not have a report at this time but would probably have a report for the next meeting of the Committee.

(c) Report of Manual Revision Subcommittee

Mr. McIntyre said that most of the members of this subcommittee were also members of the Houston Conference Subcommittee and that, consequently, they did not have a report at this time.

6.0 LABELING CONFERENCES

(a) Offer of New Labeling Exhibit

Committee members discussed the offer of the Lederle Laboratories Division, American Cyanamid Company, to donate an exhibit to MCA. It was pointed out that it would require an expenditure of approximately \$400 to put this

exhibit into shape for use at the Houston Labeling Conference and future conferences.

After this discussion,

It was moved, seconded, and voted

THAT the Lederle exhibit be shipped to Washington and that the Secretary make arrangements to have the exhibit put into proper condition.

(b) Plans for Houston Conference

Mr. McIntyre, Chairman of the Houston Conference Subcommittee, reported that he met recently with Mr. Harry Whitworth of the Texas Chemical Council and Messrs. Lakey and Doughty of the Texas State Department of Health. Mr. Doughty stated that he was quite pleased that the Labeling Conference was being held in the Houston Area. He offered to supply us with the names of individuals in the Departments of Health of neighboring states for invitation to the Conference.

Mr. McIntyre said that he investigated the facilities of the Shamrock Hotel and that he was quite pleased with them. The Conference will be held in the Emerald Room, which is large enough for all the Conference activities.

Mr. McIntyre discussed the tentative program briefly. The Conference will begin with an introductory speech and this will be followed by a paper on the manufacturers legal responsibilities. As a result of the discussion with his subcommittee members, Mr. McIntyre suggested that we attempt to secure Mr. John Connor, Counsel for CSMA, to give the talk on the manufacturers legal responsibilities. When Mr. Connor is approached, it will be made clear that all expenses incurred will be paid by MCA and made a part of the Conference expenses.

The second paper in the morning will be devoted to a history of precautionary labeling, and the third paper will be a review of existing labeling laws. The remainder of the time in the morning will be devoted to a question and answer period. Mr. Whitworth will be asked to introduce Mr. Lakey, who will give a short talk at the noon luncheon.

In the afternoon, the first paper presented will cover the basic principles of warning labels, and the second paper will cover "Future Principles of Warning Labels." This paper will, in part, be devoted to the labeling of small packages.

The third paper in the afternoon will be given by one of our toxicologists. The last paper will be a philosophical one and will have a title

such as "From Principles to Practice." Following these papers, there will be an afternoon question and answer period.

Mr. McIntyre said that one thought which the subcommittee had was that registrants will be asked to submit questions in advance of the Conference so that the panels will be able to prepare their answers to them.

Mr. Hogan has agreed to work with the MCA Public Relations Department in their publicity endeavors for this Conference. Committee members informed General Hull of their earnest desires that adequate pre-Conference and post-Conference publicity be obtained. General Hull agreed that this was desirable. He said that it would be a great help to the MCA PR Department to have the papers well in advance of the Conference and, if possible, a month in advance.

The Conference will conclude in the afternoon with a social hour, which will give members a chance to talk personally with those in attendance and especially to the Government officials present.

(c) Future Conferences

The Committee discussed locations for future conferences and concluded that a conference should be held in California and in the Midwest. Some members were in favor of holding the conference in the Fall of 1958 while others felt that it would be better to defer such a conference until the Spring of 1959.

After this discussion,

It was moved, seconded, and voted

THAT a conference be held in California during the early part of 1959.

(This motion was carried by a vote of nine to four).

The location of the meeting in California was then discussed.

It was moved, seconded, and voted

THAT the meeting be held in San Francisco.

31.0 PUBLIC RELATIONS ACTIVITIES

The Chairman discharged with thanks the "Read the Label" Subcommittee.

MISCELLANEOUS

(a) New York Bar Association

The Secretary reported that his attention had been called to the fact that Dr. Conley of AMA would deliver a paper at the Food, Drug, and Cosmetic

19
Section of the New York Bar Association on AMA's Model Labeling Bill. Following receipt of notice of this meeting, the Secretary took up the matter with Mr. Hobbs, MCA Staff Counsel. Arrangements were made for Mr. Hobbs to report on MCA's activities in the field of precautionary labeling following the remarks of Dr. Conley.

(b) Speech at Penn State Occupational Safety Institute

Mr. Nicholas Walker reported that he had delivered a speech at the Safety Institute but that he was somewhat disappointed in the attendance. However, those who were present received the speech well.

(c) Speech at National Drug Conference in New York City


Mr. Williamson reported that he had delivered a speech on the labeling of household products at this conference and that it was well received. He stated that he was especially pleased that Dr. Conley was in attendance at the time.

(d) LAPI Committee Position on Labels for Safety Data Sheets

The Committee discussed the drafting of labels for safety data sheets and,

It was moved, seconded, and voted

THAT the LAPI Committee not proceed with the drafting of labels for safety data sheets until the first draft of the sheets are available from the General Safety Committee.


James D. Kittelton
Secretary
Labels and Precautionary
Information Committee

Attachment

COPY

APPENDIX "A"

STATE OF INDIANA
Indiana State Board of Health
1330 West Michigan Street
Indianapolis, Indiana

January 13, 1958

Mr. Leland K. Fishback
Executive Secretary
Indiana Petroleum Industries Committee
American Petroleum Institute
509 Circle Tower
Indianapolis, Indiana

Dear Mr. Fishback:

In accordance with our recent telephone conversation, I am enclosing our suggested list of petroleum industry items which may come within the purview of the Indiana Household Poison Registration Act if they contain toxic ingredients and are sold at retail to the general public for private use in or about the home. This list is based on the recent conference of petroleum industry representatives which you were so kind as to assemble for a discussion of this subject.

Our suggested list of products in this category is as follows:

Radiator Cleaners	Glass Cleaners
Antifreezes	Tire Cleaners
Lighter Fluids	Tar Removers
Waxes & Polishes	Windshield Washing Solvents with
Chrome Cleaners	Antifreeze
	Gasoline Line Antifreezes
	Stop-Leak Compounds, (Radiator Sealers)

We appreciate very much your offer to distribute this suggested list of products to your colleagues and associate members in the American Petroleum Institute.

Very truly yours,

/s/ Robert A. Tucker

Robert A. Tucker, Chief
Registration and Licensing Section
Division of Food and Drugs

RAT:zrw