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March 17, 1997

Dr. John Hopkins, Director
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Skillman, NJ 08558-9418

Dear Dr. Hopkins:

A post scriptum to my comments faxed to you on March 16. The CTFA Response Statement of March 10 states in its last sentence of its last full paragraph: "The determination of this workshop was that the scientific evidence did not demonstrate any real association between talc use in consumer products and ovarian tumors." This statement is technically and factually incorrect and leaves the CTFA wide open to potentially devastating counter-attacks backed by appropriate literature references. There are at least 9 epidemiological studies published in the professional literature describing a statistically significant (albeit weak) association between hygienic talc use and ovarian cancer. Any statement denying such an association can therefore be easily demolished by the opposition with resultant damage to CTFA's credibility. Instead, I am recommending a CTFA position along the lines suggested in my fax of March 16. In summary, "yes, there are those studies showing a weak association, but their biological significance is questionable for several reasons (as repeatedly outlined). The data are inconsistent and therefore inconclusive. None of the authors claims to have demonstrated causality. Other epidemiological studies have shown no such an association. Last but not most important, all available evidence was examined at the workshop and the panel of experts concluded that hygienic use of cosmetic talc presents no risk to the consumer. No evidence has surfaced since the workshop that would require a re-examination of the panel's position."

The text suggested in my fax of March 16 states CTFA's position without inviting a counterattack.

I trust that my comments will be helpful to formulate a final, defensible CTFA response.

Kind regards

Al

cc: M.R. Chudkowski

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