

---

**Gezondheidsraad**

Health Council of the Netherlands



Shripal Sharma  
Global Director, Product Stewardship  
IMERYYS Talc America Inc.  
1732 N First St., Suite 450  
San Jose, CA 95112

---

Subject : Comments on draft report 'Talc'  
Your reference : May 16, 2012, Letter/Comments on draft report 'Talc'  
Our reference : I 1287/BvdV/fs/S16  
Enclosure(s) : 2  
Date : July 24, 2012

Dear Dr. Shripal Sharma,

Thank you for your comments on the draft report 'Talc', which was published for public review in February 2012 by the Subcommittee on Classification of Carcinogenic Substances of the Dutch Expert Committee on Occupational Safety (DECOS) of the Health Council of the Netherlands.

The Subcommittee highly appreciates the detailed comments and recommendations by the IMERYYS Talc America Inc. which enabled the committee to modify and improve its report.

On behalf of the President of the Health Council, I respond to the comments made by IMERYYS Talc in the annex to this letter.

Enclosed you find a copy of the final report on 'Talc'.

Yours sincerely,

G.B. van der Voet, PhD, ERT  
Scientific secretary

2 enclosures: response of DECOS on comments by IMERYYS, and final report on 'Talc'



Annex:

Responses by DECOS to IMERYYS comments on Draft evaluation of the carcinogenicity and genotoxicity of talc (May 16, 2012)

Ad 1 Category 4 or 3 ?

Although the Committee is aware that the occupational studies in millers are negative, it will not overlook the ambiguous outcomes of the other occupational studies in miners and talc workers, and of the perineal exposure studies. The Committee is of the opinion that in both these latter study categories coexposures may obscure the presence or absence of a carcinogenic effect of talc. The Committee is also of the opinion that the data are too weak to classify talc in category 4 and classification in category 3 is most applicable.

Ad 2 Perineal use of talc-based body powders

The Committee agrees that talc is only one of the components of the cosmetic powder and that the composition of the powder is not always clear from the study reports. The Committee also agrees that 'talc' is used in these perineal studies as a collective term and decided to use the IARC definition 'talc-based body powder' in the final report. The text has been rephrased (P23 and P36 of final report).

(P23L7 of draft report)

the Committee is of the opinion that perineal exposure is relevant indeed for the occupational situation since this also concerns dermal exposure. The text has been modified (P36 of final report).

Ad 3 Pleurodesis

The Committee is aware of the use of talc in talc pleurodesis. However, it did not retrieve evidence that long term use of talc in pleurodesis does not cause cancer.

Ad Follow-up meeting ?

The Committee prefers to discuss the comments on the draft report in one of its meetings and to process the response in writing. If questions arise the Committee will approach IMERYYS for additional information.

---

**Gezondheidsraad**

Health Council of the Netherlands



Dr. Michelle Wyart-Remy  
Secretary General, EUROTALC  
26 rue des Deux Eglises  
B-1000 Bruxelles (Belgium)

Mr. Mark G. Ellis  
President, IMA-NA  
2011 Pennsylvania Avenue, NW  
Suite 301  
Washington, DC 20006

---

Subject : Comments on draft report 'Talc'  
Your reference : May 10, 2012, Letter + Comments on draft report 'Talc'  
Our reference : I 1286/BvdV/fs/T16  
Enclosure(s) : 2  
Date : July 24, 2012

Dear Dr. Wyart-Remy, dear Dr. Ellis,

Thank you for your comments on the draft report 'Talc', which was published for public review in February 2012 by the Subcommittee on Classification of Carcinogenic Substances of the Dutch Expert Committee on Occupational Safety (DECOS) of the Health Council of the Netherlands.

The Subcommittee highly appreciates the detailed comments and recommendations by the EUROTALC and IMA-NA which enabled the committee to modify and improve its report.

On behalf of the President of the Health Council, I respond to the comments made by the International EUROTALC and IMA-NA in the annex to this letter.

Enclosed you find a copy of the final report on 'Talc'.

Yours sincerely,

G.B. van der Voet, PhD, ERT  
Scientific secretary

2 enclosures: responses of DECOS on comments by EUROTALC and IMA-NA, and final report on 'Talc'

---

P.O. Box 16052  
NL-2500 BB The Hague  
Telephone +31 (70) 340 67 79  
Telefax +31 (70) 340 74 47  
E-mail: b.v.d.voet@gr.nl

Visiting Address  
Parnassusplein 5  
NL-2511 VX The Hague  
The Netherlands



## Annex

### Responses by DECOS to EUROTALC and IMA-NA comments on OCR Talc (May 10, 2012)

#### Ad 1 Talc identity and physico-chemical properties

(P6L7-9 of draft report)

The Committee agrees with this more accurate definition and the text in the report has been changed accordingly (P16 of final report).

#### Ad 2 Inhalation of talc (not containing asbestos or asbestiform fibres)

(P22L13-21 and P23L3-5 of draft report).

The Committee is of the opinion that in these studies (on talc miners and other industrial populations) coexposures may obscure the presence or absence of a carcinogenic effect of talc. The text has been rephrased (P35 and P36 of final report).

(P24L4 of draft report),

According to the Committee it may also induce the idea that it is only a matter of time before talc will be categorized as a non-carcinogen. The Committee agrees that the phrase 'as yet' causes confusion and can be deleted (P37 and P11 of final report).

(P24L5 of draft report).

Although the Committee is aware that the occupational studies in millers are negative, it will not overlook the ambiguous outcomes of the other occupational studies in miners and talc workers, and of the perineal exposure studies. The Committee is of the opinion that in both these latter study categories coexposures may obscure the presence or absence of a carcinogenic effect of talc. The Committee is also of the opinion that the data are too weak to classify talc in category 4 and classification in category 3 is most applicable.

#### Ad 3 Perineal Exposure and ovarian cancer

(P22L31-39 of draft report)

The Committee agrees that talc is only one of the components of the cosmetic powder and that the composition of the powder is not always clear from the study reports. The Committee also agrees that 'talc' is used in these perineal studies as a collective term and decided to use the IARC definition 'talc-based body powder'. The text has been rephrased (P23 and P36 of final report).