

Date: August 21, 1998
From: Bill Taylor
To: Hugh D Hanes/ELM/BWI@BWI
cc:
Subject: IARC Project

Further to last Tuesdays Reg/Leg meeting and our discussion today , this is how I see the situation .

- 1 IARC is about to embark upon a review of its classifications . If ever there is to be an opportunity to approach them again , this must be it .
- 2 My nickel industry contacts indicated that IARC was willing to look at the classification of stainless steel separately from that of nickel . If that is the case , then they should be willing to look at CuBe as a separate classification also .
- 3 The carcinogenic classification of CuBe is a real threat to our business , this threat stemming from EU legislation , and "green" country efforts , notably Sweden , to prioritise carcinogens on their hit lists for phase out . EU legislation has global impact . IARC classifications impact EU legislation
- 4 It ought to be possible to meet with IARC to put to them a prima facie case that CuBe must be an extremely weak carcinogen , if it is one at all . In light of IARC's own definitions of their carcinogenic categories , and in light of the huge potential commercial impact of the carcinogenic classification of CuBe , of which they are probably not aware , it would surely not be too much to ask them to give consideration to a separate classification for the alloys , hopefully no classification or a downgraded classification .
- 5 Our case would begin with the Be data and the fact that even if one agrees that Be is a carcinogen , it must itself be a extremely weak one . The data on which the classification is based are subject to a number of confounding factors , the latest being the likely sulfuric acid effect . The exposure levels were up to around 1000x the current standard . In spite of all this , the SMR was extremely low , and close to insignificance . Be has to be no worse than an extremely weak carcinogen ! Then we put no more than 2% of this extremely weak carcinogen into CuBe alloy . This very dilution must take "extremely weak" down to "insignificant " , but , in addition, the entrapment of the Be in the Cu (and in the Ni or Co additives) in solution or as beryllides must further render the Be as non bioavailable.

This reasoning suggests that it is *unlikely* that CuBe is carcinogenic . The next question is whether there is any actual workplace or clinical evidence for it being carcinogenic

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?Possibly we can only be anecdotal here and say that the answer is "no".(But given the large numbers of medical records of CuBe workers is there the possibility that we could make a new epidemiological study with respect to cancer amongst these workers ?)

So far , we would be saying that carcinogenicity is not expected in CuBe and that , in fact , there is no evidence for it . Now what about laboratory data ?.

Here as far as I know , the only work done on CuBe as such was by Groth et al and this failed to show tumor development at the Be levels of our commercial alloys . Whilst this is only one study , that could be turned around to say that the *only* data available indicate that CuBe is *not* carcinogenic .

Thus , carcinogenicity is not expected , it is not seen in exposed workers and it is not found in animal exposure . What justification is there , therefore , for classifying it as such , given the potential commercial damage that could result ? . Not only can we , the supplier suffer , but our customers would have to compromise the reliability , performance and safety of their products by using inferior alloys for critical circuitry in aircraft , cars , computers etc. , etc. .

If we do approach IARC along these lines , our attitude would be of paramount importance , in my opinion . Not having met them myself , I would suggest a submissive , appealing approach , rather than one which they might see as a challenge or as antagonistic .

Anyway , that's my two penn,orth ! .

Rgds

Bill

⊛ Relative risk NOT IARC issue .

⊛ BILL GET US IN TOUCH WITH APPROPRIATE PEOPLE, INFORMAL AUDIENCE TO DISCUSS PROCESS & OUR POSITION .

⊛ ← CONF CALL ON 9/3/98
→ KOLANZ } + JANKE, POWERS, #
→ TAYLOR }
→ DEUBNER }

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