March 3, 1969

CONFIDENTIAL

(Privileged Communication
Between Counsel)

Herbert Morton Ball

Asbestos Fibre Sales
Warning Labels

In view of C. B. Burnett's concern about foreign laws relating to warning labels, you may be interested in the following:

First, those exposed to the possibility of airborne asbestos fibres will include the following:

Handlers in transit:	Ships' crews Stevedores and dockmen Truck and rail crews Warehousemen
Customers:	Plant personnel Applicators Distributors
Public:	Residents near plants Buyers of salvaged bags Buyers of products Public

Second, the "offshore" business is considerable. Using 1968 sales figures, almost 200 customers in more than 50 countries bought more than 263,000 tons of asbestos fibre having an FOB value of almost $37,000,000. These include:

1.) Eternit: 40 companies in 30 countries, in only 11 of which is Eternit the sole customer.

2.) Distributors: 17 companies in 16 countries.

3.) J-M companies as distributors: 8 companies in 7 countries.

4.) Miscellaneous: includes foreign government owned import distributors, affiliates of U.S. companies, and British companies and their affiliates.

Third, countries involved include:

1. Latin America: 17 countries with a volume of $8,300,000.

2. Europe: 20 countries with a volume of $20,700,000.

3. Asia: 14 countries with a volume of $5,300,000.

4. Australasia: 2 countries with a volume of $1,900,000.

5. Africa: 5 countries with a volume of $605,000.

Accordingly, primary attention would be indicated for the following:

1.	Latin America:	Mexico	*
		Puerto Rico	*
		Argentina	*
		Brazil	*
2.	Europe:	England	*
		Belgium	*
		Denmark	
		France	*
		Germany	*
		Italy	*
		Poland	
		Rumania	
		Spain	*
		Sweden	*
3.	Asia:	India	*
		Iran	
		Japan	*
		Malaya	
		Taiwan	*
		Thailand	
4.	Australasia:	Australia	*
		New Zealand	
5.	Africa:	Rep. of So. Africa	*

(* Note: J-M has legal counsel in or for these countries)

In view of the above, I see no real alternative but to recommend that legal counsel be consulted where available.

I am trying to find a U.S. exporter of a product giving similar problems and have requested A. J. Mangan's advice. To date, I know of none where there is a comparable situation and I could expect to obtain meaningful advice.

William P. S. Breese

WPSB:msh