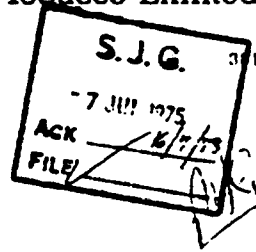


Copy to Dr. S.R. Ely 7/7/65

Imperial Tobacco Limited/Limitée



Dr. S.J. Green,  
British American Tobacco Company,  
Westminster House,  
7 Millbank,  
London S.W.L. P3JE,  
England.



10, rue St-Anoine Street  
Montréal, P.Q. H1C 1B5  
(514) 932-6181  
P.O. Box 8500 C.P.  
Montréal, P.Q. H3C 3L6  
Cable/Câble 'Triimp'

July 3, 1975

Dear Jim,

Our Manufacturing Department has had a verbal request from the Safety Committee of our Guelph Plant for information concerning the safety or otherwise of menthol in the atmosphere of the foil mentholation room at Guelph. The request needs a written reply, but relevant knowledge is very sparse. No medical problem has ever been encountered here with menthol, except for rare occasions when some workers have claimed it caused nausea. We have not measured the level of menthol in the mentholation room.

Standard reference books on chemical toxicity indicate that menthol is pretty innocuous, but give no indication of long term inhalation effects. The "Toxic Substances List" (1974 edition, U.S. Dept. HEW, p. 467) gives toxicity dose data for menthol for different animal species, but only by oral, subcutaneous and intraperitoneal routes of administration. All figures indicate a low toxicity. Sax's "Dangerous Properties of Industrial Chemicals" indicates that menthol can act as a moderately strong irritant in the short term (acute, local effect), although its chronic irritant effect is only slight. All other reported effects are only slight, i.e. allergen, ingestion and inhalation (acute local).

We could readily make some menthol analyses of the plant atmosphere, but feel that this would serve no purpose unless we have a guide as to what level of menthol might constitute a risk to health. However, from such analyses, we could estimate the possible amount inhaled in a working day.

At a meeting of the Additives Guidance Panel on January 12, 1970, published information relating to an "acceptable daily intake" (ADI) of menthol was discussed (American Perfumer and Cosmetics, July 1969, p. 33-35, and September 1969, page 57-58; copy attached). This paper quoted figures of 0-0.2 mg/kg body weight for an unconditional ADI, and 0.2-2.0 mg/kg body weight for a conditional ADI. These ADI's derived from a strict toxicological approach in Europe, and the author of the article (P.B. Hutt) considered that they are nothing more than educated guesses based on insufficient toxicological information; he was very critical of Europe's approach, as compared to the more realistic approach adopted in the U.S.

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In a later meeting of the Additives Guidance Panel (April 14, 1970), it was stated that the panel saw no reason to pursue further the subject of the acceptable daily intake of menthol, after having made a critical assessment of all the facts.

To help us prepare an answer to the Guelph Safety Committee, we would appreciate if you could send us more details of the deliberations of the Panel on this subject, together with any other information on menthol toxicity that BAT has.

We have also inquired for information on menthol safety from Dragoco, who have a very large menthol purification plant in Europe and are awaiting their reply.

With kind regards,

Yours sincerely,



R.S. Wade  
Manager  
Research & Development

TAS/cp  
Encl.

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