

J&J PROPOSAL: TALC TEST FOR ASBESTOS

MANDATORY FOR EVERY TALC SAMPLE

- Analysis by X-Ray Diffraction (XRD)
- Analysis by Polarized Light Microscopy (PLM)
- Analysis by Transmission Electron Microscopy (TEM)

ADDITIONAL ANALYSIS

If, after the three mandatory test methods, amphibole particles have been identified where there is ambiguity as to habit of growth, two additional analytical steps may be taken by the analyst:

- Further PLM and/or TEM analysis to gather additional information that may remove any ambiguity as to the habit of growth of the amphibole particles at issue; and
- Scanning Electron Microscopy (SEM) analysis on ambiguous particles identified during TEM analysis.

REPORTING REQUIREMENTS

- Tabulate and report all amphibole and chrysotile particles having a length ≥ 0.5 micrometer (μm) (500 nanometer (nm)) and a ratio of length to width, i.e., aspect ratio (AR), $\geq 3:1$ in talc-containing cosmetic products and talc intended for use in cosmetics,
- Only report as “Asbestos”: chrysotile particles that meet the counting criteria, and amphibole particles (1) that meet the above counting criteria, and (2) where the analyst is able to confirm that the amphibole is “asbestiform” (as defined by the 2022 IWGACP White Paper).
- If—after reviewing all of the chemical composition and morphology information from all analytical techniques used by the analyst—ambiguity remains as to certain amphibole particles, then the amphibole will be reported as “Amphibole (Habit of Growth Inconclusive).”
- Tabulate and report all non-asbestiform particles having a length ≥ 0.5 micrometer (μm) (500 nanometer (nm)) and a ratio of length to width, i.e., aspect ratio (AR), $\geq 3:1$ identified in talc-containing cosmetic products and talc intended for use in cosmetics as “Non-Asbestos EMPs,” including reporting the specific mineral species where possible based on the available data.