# TRANSMITTAL OF SUBSTANTIAL RISK INFORMATION

**Monsanto, as required by the Toxic Substances Control Act, will report immediately to the U.S. Environmental Protection Agency any information it obtains which reasonably supports the conclusion that a chemical substance or mixture manufactured, processed, or distributed in commerce by the Company presents a substantial risk of injury to health or the environment.**

The requirements of Section 8(e) of the Toxic Substances Control Act apply to "any person who manufactures, processes, or distributes in commerce." It is Monsanto's position that the "person" who engages in the commercial activity is only the business organization, whether a sole proprietorship, corporation, partnership, or association.

The Director of DMEH, Environmental Counsel, and the appropriate operating company Director(s) of Environmental Operations will comprise the designated official committee to make decisions with respect to information that must be reported to the EPA under Section 8(e) of the Toxic Substances Control Act.

Appropriate Managing Directors; the Senior Vice President, Environmental Policy Staff; and if required the Corporate Administrative Committee will be informed of committee decisions.

In the event that a committee decision is not unanimous the next appropriate level of management shall be consulted, and the matter will be resolved at the highest level if necessary.

Appropriate employees of the Company shall be informed of the provisions of Section 8(e).

Employees who submit information through Company channels will be notified of action taken by the Director of DMEH, together with reasons for such action.

In the event that, after Monsanto has evaluated information and has determined that the item is not reportable under Section 8(e), the Company becomes aware that an employee, as an individual, subsequently reported the item to the EPA, then the Company should review the situation to determine what action, if any, it should take with the EPA.

## PROCEDURE

Each organization specified below shall have a designated individual to whom such information shall be communicated. They are as follows:

Operating Companies—The Director of Environmental Operations.

Corporate Research and Development Staff—Manager, Safety and Environmental Technology.

Monsanto Research Corporation—President.

Corporate Engineering Department—Director.

Anyone obtaining information of the type described above should immediately submit such information to his supervisor. The supervisor shall immediately relay the information to the location or department manager, whichever is applicable, who in turn transmits it to the proper designated individual in his organization. The information is then transmitted directly to the Director of the Department of Medicine and Environmental Health.

It is imperative that the flow of information through this transmittal chain be rapid because the Company must decide on appropriate action within fifteen calendar days from the time the originating individual obtains the information. In the event of nonavailability of a member of the communication network at the time information is first obtained, such member should be bypassed in the interest of speed.

All individuals involved in submission of substantial risk information to the Director of DMEH should keep a record of date of receipt and pertinent identifying details.

*(Approved: Corporate Administrative Committee, October 6, 1980.)*

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