From MONSANTO CHEMICAL COMPANY

At St. Louis - Roberts 2

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Date August 30, 1957

To Mr. P. G. Benignus

At Roberts 3

Reference PGB Sales Information Bulletin 8-27-57
OD 1149 - "Aroclors As Agricultural Chemicals", 4-1-57 by JMM

Subject

AROCLOR USE TO INCREASE THE INSECTICIDAL LIFE OF LINDANE

It is most surprising to see that you are recommending without restriction a use for Aroclor which has not been approved by U.S.D.A.-F.D.A. For the protection of the company it appears that salesmen who may try to promote this use of Aroclor in agriculture should be fully apprised of limitations and of risks involved if promoted for use on feed and food crops. In turn they should apprise customers of the true status of the development and advise them that if they use Aroclor in insecticide formulations on food or feed crops they should first obtain government approval.

You may already know that since Aroclors are toxic and, according to your attached reference, may extend the residual life of the pesticide, the Federal Government would require the following before selling for use on food and feed crops:

(1) Proof of benefits from the application.

(2) Data to show whether or not residual Aroclor is present and whether it modifies the residual amount of Lindane or other active ingredient at harvest.

(3) If Aroclor is present or if the residual quantity of Lindane or other active ingredient has been significantly changed, tolerances for the Aroclor and for the pesticide in question must be developed.

(4) If a toxic quantity of Aroclor is present at harvest in food or feed crops a tolerance cannot be established until after two year chronic toxicity feeding tests have been completed for the Aroclor.

Obviously, much of the above is obviated if the Aroclor-insecticide formulation is not used on food or feed crops. Even then the label must show safe handling procedures, since Aroclor is toxic.

Incidentally, the findings published by Duda, as per your attached reference, are not in accord with research findings reported in reference report OD 1149. In this report you will note that Aroclor

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contributes to longevity of insecticidal action only when combined with highly volatile compounds, and then only when applied to hard, smooth surfaces such as glass...not on agricultural plants. This is called to your attention because government label approval for use in agriculture also calls for proof of performance.

Admittedly, your August 27 bulletin does not specify using Aroclor in insecticides for use on food or feed crops but neither does it specify such a combination should not be used on food or feed crops. Perhaps this is an over-sight which you will wish to call to the attention of recipients of the bulletin.

L. V. Sherwood

LVS/eb

p.s. We repeatedly find that users of formulations prepared for a specific use will apply the material for other uses. In other words, even though Monsanto may encourage the use of Aroclor in pesticide formulations for non-agricultural use you can rest assured that some of it will be used on agricultural commodities. For these reasons alone it is strongly recommended that we state very specifically in any Monsanto literature, including correspondence, that Aroclors not be used on agricultural commodities. I believe our Legal Department will confirm that there is an important legal aspect involved.

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