PROGRAM

6.1 Health, Safety and Environmental Information and Risk Characterization

6.1.1 New chemical products, new isolated process intermediates, and significant new uses of existing chemical products will have adequate health, safety, environmental, and exposure information to support a preliminary product risk characterization (ER-200 or EC-201, and an R&D SDS), at the earliest practical stage of R&D and prior to offsite shipment. A product risk characterization, including an EC-202, a final SDS and a shipping classification, will be completed before new product commercialization.

6.1.2 The Monsanto process for generating and maintaining a SDS is comprehensive, and will fulfill the requirement for a product risk characterization. Whenever significant new information becomes available, it will be reviewed as part of the SDS program to satisfy regulatory and product risk characterization requirements. A SDS review / product risk characterization will be performed on a periodic basis, commensurate with product risk but no less than every five (5) years.

6.1.3 Product files or information systems will be maintained for all products or product families. The product files or information systems will contain the types of information necessary to fulfill regulatory requirements and to perform product risk characterizations and assessments, as appropriate including:

- Safety Data Sheets;

Compliance

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TSCA – Inventory – PMN
FIFRA – Registration
NS FDA – Approval
Search OSHA – MSDS
International
TSCA – Reporting – 8 c, d, e
FIFRA –

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- References to relevant literature or internal reports dealing with health and safety (toxicology, epidemiology, industrial hygiene, flammability, reactivity, etc.), relevant information on composition, physical properties, raw materials, manufacturing processes, principal by-products, protective measures, exposure information, energy requirements, wastes and disposal practices;

- Use information, including handling, transport, packaging and storage, which will either be estimated (typically for new products) or obtained by visits or reviews of customer, distributor and consumer practices;

- A critical review of health and environmental effects and exposure information, such as EC-201, EC-202, Monsanto Work-Place Permissible Exposure Guideline (MWPEG) Reviews, Health Effect Reviews and Toxicology Reviews;

- Technology Risk Reviews.

- Health concerns from customers, employees or the public.

6.2 Risk Management System

6.2.1 A systematic approach to risk management will be implemented and maintained for new products. Existing products will be managed on a case-by-case basis.

6.2.2 Risk management options, where needed, will be an integral part of the follow-up to each phase of a product risk characterization,(as detailed in Section 6.1).

6.2.3 All products will be appropriately labeled for hazard or risk and will conform as a minimum to governmental requirements and appropriate consensus standards (ANSI, ISO, etc.).

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6.2.4 Examples of specific risk management actions are detailed in Sections 6.3 through 6.7.

6.2.5 Document Risk Management actions in product files.

6.3 Product and Process Design and Improvement

6.3.1 R&D materials utilized in the laboratory will be handled under to Prudent Laboratory Practices or equivalent.

6.3.2 Pollution prevention principles (Guideline #1) will be included as a review criterion in technology risk reviews for new and existing chemicals.

6.3.3 Pollution prevention principles (Guideline #1) will be incorporated into the EC-201/202 assessments.

6.4 Employee Education and Product Use Feedback

6.4.1 Employee education for the purpose of safe handling and use of chemicals, is addressed in Pledge Guideline #2, Employees with significant customer interaction will be trained to recognize and feed back information about product use and misuse to Monsanto's environmental network.

6.4.2 Feedback systems to listen to stakeholders will be nurtured and expanded where appropriate. These systems include: commercial and technical service liaison with customers, product hotlines, poison control center relationships, etc.

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6.5 Contract Manufacturers

See Pledge Guideline No. 7 - Outside Processors

In addition, provide guidance and information for contractor personnel on the safe handling and transportation of Monsanto products.

6.6 Suppliers

6.6.1 Up to date and high quality product information, including composition data and Safety Data Sheets will be obtained from suppliers for all raw materials.

6.6.2 Suppliers will be actively engaged as appropriate, commensurate with raw material risks.

6.7 Distributors, Customers and Other Direct Product Receivers

6.7.1 Assure SDS's and other appropriate safety literature are provided to all direct product receivers.

6.7.2 As appropriate, actively involve Monsanto product receivers in dialogue and outreach regarding appropriate risk characterization, risk management and risk reduction. Where applicable, conduct Monsanto assisted audits. If improper practices involving a Monsanto product are identified, work with the product receiver to improve the practices. In cases where adequate improvement is not evident take appropriate action, including termination of product sale, if necessary.

6.7.3 Actively seek product receiver involvement as input to continuous improvement of Monsanto products, and as a means of seeking product differentiation from competition, on the basis of health, safety and environmental stewardship.

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6.11.6 Prudent Practices for Handling Hazardous Chemicals in Laboratories, National Research Council, National Academy Press, Washington, DC 1981

6.12 COORDINATOR

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