draft #1

DRAFT

November 2, 1971

Dr. Robert W. Risebrough
Associate Research Ecologist
Bodega Marine Laboratory
University of California
P. O. Box 247
Bodega Bay, California 94923

Dear Dr. Risebrough:

I understand and respect the strong belief you express in your letter dated October 25 that in your opinion we cannot adequately protect the environment unless it is possible to relate PCB production figures and environmental input to contamination levels in fish and other components of the biosphere.

I agree that our responsibilities should include consideration of all other persons who may eventually be affected by PCB contamination of the environment in addition to our employees, shareholders, and customers.

It is with these responsibilities in mind that we have been reluctant to divulge PCB usage numbers to the general public. We are extremely concerned and sincerely believe that the abstract numbers will be misunderstood, misinterpreted, misapplied and in some instances used to arouse emotions to further some self-seeking causes.

To fully comprehend the significance of these numbers one must consider in depth the conditions under which PCB's are manufactured, stored, shipped and used. Quantities escaping into the environment in the past and now must be estimated. The isomer content of each commercial PCB mixture must be known and the degradability of each isomer must be considered. I am certain you can appreciate the overall complexity of such a study.

Monsanto has been repeatedly accused of callously refusing to divulge usage data. On the contrary, we have on many occasions expressed our willingness to discuss this information with responsible members of governmental agencies on a confidential basis for the eventual use of the information in scientific studies.

Recently arrangements have been made with Dr. Edward Berger, Jr. of the Office of Science and Technology for a thorough discussion of this data with a representative of the federal PCB Task Force. Once the data is available and viewed in the proper perspective the federal agencies represented on the Task Force will be able to take appropriate actions to fulfill their responsibilities of protecting the public and the environment.

Sincerely,

MONS 094507

W. B. Papageorge, Manager
Environmental Protection

cc: Professor Edward D. Goldberg
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