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PRODUCT STEWARDSHIP

Monsanto products and intermediates will not present an unreasonable risk of harm to human life or health, or to the environment when they are properly handled, transported, used or disposed. Stakeholders will be provided information regarding handling, storage, use and disposal of Monsanto products.

INTRODUCTION

Employees, customers and the community are all important stakeholders that are directly affected by Monsanto's product stewardship programs. Inherent in these programs is the responsibility for assessing, managing, and communicating the risks associated with the products and intermediates Monsanto manufactures or markets or plans to manufacture or market.

Product assessments are at the heart of this process and involve judgments by specialists about the level of risk borne by stakeholders as a result of manufacture, processing, distribution, use and disposal of a product. They integrate data on effects, (such as toxicology, epidemiology, and medical observations), with product composition and exposure information (such as industrial hygiene monitoring, and environmental fate). For each Monsanto product or intermediate, we need enough data or information to reach a supportable conclusion that under reasonably anticipated conditions of handling and use, the product does not pose an unreasonable risk to those who may be exposed or the environment. We must recognize that our stakeholders have a voice in this decision process. It is our responsibility to provide stakeholders with information such as labels and Material Safety Data Sheets, which will permit them to have knowledgeable input into the process. Our risk management actions must reflect stakeholder input.

PROGRAM

1. All new product candidates and new process intermediate candidates will be assessed and managed as detailed below. Note: in view of the unique characteristics of articles, they will be handled separately from this program.

   a) All local, national and international product regulatory requirements will be satisfied in a timely fashion during project development.

   b) R&D materials utilized in the laboratory will be handled according to Prudent Laboratory Practices (e.g., National Research Council Guidance, Monsanto Research Center Policies and Procedures, or similar).

   c) New R&D products and process intermediates, that are either;

      i) shipped to customers, non-laboratory facilities or laboratories covered by the OSHA Hazard Communications Standard or,

      ii) produced in significant quantities (e.g., U.S. regulations define significant quantities as "quantities in excess of 100Kg/year") or,

      iii) manufactured or handled in non-laboratory facilities,

      will have a completed product safety review (i.e., one or more of the following: ER-200, EC-201, pilot plant safety audit or equivalent, Institutional Biosafety Committee Review) an appropriate label, and a Material Safety Data Sheet, or R&D equivalent.

   d) New products, new process intermediates, and significant new uses of existing products will have a product assessment (EC-202 or equivalent), a Material Safety Data Sheet and a shipping classification (TF-837 or equivalent) completed before commercialization.

   e) Material Safety Data Sheets for new products and process intermediates will be made available to all persons engaged in R&D commercialization of these materials.

2. All commercial products, process intermediates or product families comprised of these materials, will have ongoing product assessments, risk management and hazard and risk communications.

PROGRAM *(continued)*

a) Material Safety Data Sheets or equivalent will be developed for all Monsanto products and process intermediates. Material Safety Data Sheets will be provided to employees and customers and made available to other stakeholders in an appropriate language. All issued Material Safety Data Sheets will be reviewed when significant new information affecting the product or intermediate becomes available. At a minimum, reviews will be performed every five years. Material Safety Data Sheets will be updated as appropriate as a result of these reviews. Records of Material Safety Data Sheet recipients will be maintained, where practical.

b) Product files for all products or product families will be maintained. The product file may include the following:

- Appropriate Material Safety Data Sheets, references to relevant literature or internal reports, relevant information on composition, physical properties, manufacturing processes, principal by-products, protective measures and exposure information.
- 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.

c) Information contained in product files will be used for business decisions, government interactions, public communications and other product management activities.

3. Product Stewardship is the responsibility of the business units. Each operating company, free-standing division or world area will assign an individual(s) the responsibility for assuring that this Guideline program is met.

   Guideline oversight is the responsibility of the Corporate Environmental Policy Staff.

   Units of the corporate staff (Environmental Policy Staff, Safety and Environmental Health, and others) and business units are jointly responsible for developing information needed for product assessments. This includes regular periodic reevaluation of data available in light of new information relevant to the product.

(Revised and Approved by Environmental, Safety & Health Committee April 25, 1989)

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