Monsanto

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May 5, 1983

Mr. Bill Richards
The Wall Street Journal
200 W. Monroe Street
Chicago, IL 60606

Dear Mr. Richards:

As a follow-up to our conversations, I am sending you photocopies of several documents we discussed:

Item	Subject
1	Monsanto Summary of PCB Uses, Environmental and Health Effects (November 1979)
2	National Cancer Institute Report - Bioassay of Carcinogenicity of Aroclor® 1254
3	Interdepartmental Task Force on PCBs, report of May 1972 (only Title Page, Preface, Findings, Conclusions and Recommendations Sections are provided. The total 1973 page report is available from NTIS.)
4	Appendix F (selected pages) of Item 3

The animal studies relating to carcinogenicity are summarized on Page 5, Section 2 of the Monsanto report.

As I indicated, the National Cancer Institute (NCI) animal study was performed hopefully to resolve the discrepancy between the Kimbrough and IBT (Monsanto sponsored) studies. This was the government's attempt at scientifically presenting the "last word" on this issue.

After the protocols were developed and agreed upon, the NCI study was awarded to an independent contractor (Stanford Research Institute) for experimental work. NCI monitored the progress of the study.

As you can see in the HEW press release, the NCI results came back negative, however the controversy lingers as to carcinogenicity of PCBs in animal studies.

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For all practical purposes the NCI rat feeding study by a different independent laboratory was in fact a validation of similar studies performed by IBT. The results were the same - in scientific jargon, no statistical significant relationship between Aroclor and cancer.

More recently (since 1979-1980) studies of human occupational exposure of PCBs (i.e., epidemiology studies) have now been published in peer review journals. Most of these studies have been conducted by government agencies (NIOSH) and/or sponsored by independent university scientists and medical scientists. Some were sponsored by trade unions seeking to learn the facts about occupational exposure of their members. The consensus is that cancer and other chronic illnesses have never been linked to occupational exposure to PCBs. These occupational exposures were at significant levels for extended time periods, in some cases as long as 40 years.

Monsanto's actions to voluntarily cease PCB sales and attempt to control their entry into the environment is summarized in the Monsanto Summary Document, Section 1. Supporting reasons for Monsanto's actions are detailed in the Recommendations Section of the Interagency Task Force Report (i.e., Page 3, Item 4, and Page 4, Item 6).

In response to the question of when Monsanto first reported its data on the IBT oral rat feeding studies of Aroclors, a check of the literature in my files shows that reports of Monsanto animal studies on Aroclors were made to FDA before June of 1970 and to the Interdepartmental Task Force at a meeting in Washington on September 15, 1971. Certainly these reports were made as soon as the information was available and significantly long before any doubt was cast regarding IBT laboratory credibility (see attached Item 4 taken from Appendix F of the Interdepartmental Task on PCBs, May 1972 report, Page 137).

In addition, after reports of the Kimbrough study were available, Monsanto directed IBT to review the three chronic rat studies and evaluate additional sections of rat livers for these studies. Monsanto also had an independent pathologist re-evaluate these same liver tissues.

The results of the IBT re-evaluation in 1974 of the original 1971 studies and the evaluation by the independent pathologist were presented to various government agencies and officials on November 13 and 14, 1975, including NIOSH, CEQ (Council of Environmental Quality) House Sub-Committee Manpower, Compensation, Health and Safety representatives, FDA, EPA and NCI (National Cancer Institute).

Over the past 12 to 13 years, Monsanto has responded rapidly and openly (and quite properly) to inform officials, customers and the public of PCB concerns and results of testing. In addition, Monsanto voluntarily took steps to reduce production and thus introduction of PCBs into the environment as well as providing information and assistance for properly disposing of the materials.

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I hope this information is helpful to you.

Sincerely,

John H. Craddock
Product and Environmental
Safety Director

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Enclosures

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