Monsanto

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DATE : July 8, 1980

SUBJECT : PCB SURVEILLANCE
DIRECTION PAPER/PHILOSOPHY

REFERENCE :

TO : M. C. Throdahl - D1D

cc: D. R. Bishop - A3NB
C. F. Callis - B2SA
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JUL 10 1980

Attached for your information are my thoughts related to the direction and philosophy of managing the PCB Surveillance Program. I would welcome any comments or suggestions you may have as I organize this program.

I believe these ideas are consistent with the Corporate Policy for Surveillance of Discontinued Products.

John Craddock

J. H. Craddock

jb
enclosures

IN - 10 (REV. 8/77)

PCB-ARCH-EXT0382888

DIRECTION PAPER

Monsanto will act in a socially responsible manner in the management of its products as well as all other business activities. To that end, MIC will organize and manage a program for continued surveillance of and to provide stewardship for the defunct polychlorinated biphenyl (PCB) product line in perpetuity. This program is consistent with and in support of Monsanto's Corporate Policy for Surveillance of Discontinued Products.

The major results targeted for this program are:

- Establish a Corporate focal point and center of expertise to organize, maintain and transmit information both within and outside the Corporation, including technical, regulatory, health, safety and environmental data regarding PCB's.

- Maintain continuing surveillance of PCB issues and activities, including research of the effects on health and the environment. Provide technical support for the evergreen assessment by DMEH of effects of the material on man and the environment.

- Provide continuing surveillance of technology and regulations for handling and disposal of PCB's.

- Develop and implement a rational management plan capable of anticipating and dealing with all aspects and issues related to PCB materials, if necessary in perpetuity.

7/8/80

PCB-ARCH-EXT0382889

PHILOSOPHY

- Maintain strong Corporate commitment to managing polychlorinated biphenyls (PCB's) (act vs. react).

- Develop strong, coordinated interdisciplinary team capable of responding to PCB inquiries through a central focal point:

  Coordinator/Manager
  Legal
  Public Relations
  DMEH

- Preserve technical expertise and records in all aspects of PCB.

- Keep a low, but positive, Corporate profile in dealing with general public, media and regulatory agency personnel regarding PCB inquiries and information.

- Be selective in transmitting communications regarding PCB questions/issues within Monsanto (need-to-know).

- Respond to specific inquiries using standard, written guidelines. Avoid top-of-the-head answers. Maintain records of inquiries/responses outside Monsanto.

7/8/80

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MONSANTO

Request to: Environmental Policy Committee

Date: February 15, 1980

Subject: Surveillance of Discontinued Products

ACTION:

A. Situation

As products and their precursors, intermediates, residues, by-products and wastes, are dropped from product lines, their environmental legacy may require subsequent action by the corporation.

In some instances, the company may be requested or required to provide resources and action varying from technical information to mitigating alleged hazards to the environment, the public, employees, and former employees.

B. Recommendation

Monsanto should establish a policy for the corporation's environmental and health accountability for products it ceases to manufacture and sell.

C. Action Requested

Approval by EPC, and later, endorsement by CAC of the attached Policy on Discontinued Products.

BACKGROUND:

See attached Conditions and Principles.

PCB-ARCH-EXT0382891

POLICIES

General Policy: Monsanto will act in a responsible manner in the management of its discontinued products.*

1. Monsanto will retain information on discontinued products in order to be able to assist in mitigating harm to human health and the environment.

2. The Environmental Policy Committee will approve plans and strategies to deal appropriately with discontinued products which may pose substantial danger to health and the environment. Such plans and strategies will include a report containing all known documentation of environmental and health data. EPS will be responsible for maintaining and updating this report.

3. Generally, the responsibility for managing a discontinued product will rest with the operating company or its successor which manufactured the product.
Upon approval of the EPC, EPS will assume the management responsibility with costs continuing to be borne by the operating company. In the latter event, the appropriate operating company will serve as a resource on a continuing basis in the technology of manufacture, transportation, use, and ultimate disposal, and will provide supporting information in a readily retrievable form to EPS.

4. EPS will keep appropriate health records relating to discontinued products in perpetuity; scientific evaluation of discontinued products will continue if appropriate.

5. Monsanto Hazardous Waste Management Policy will guide appropriate hazardous waste disposal procedures for all discontinued products.

6. Monsanto will remove and bear the expense to remove and dispose of discontinued products abandoned in containers it has authorized for sale, use, or disposal where such abandonment presents harm to human health and the environment. Approval authority for both removal and expected costs will be the responsibility of the Senior Vice President, Environmental Policy Staff. In each case, the EPC will be informed before such action.

*In this instance, "discontinued products" are defined as materials which were -- but no longer are -- manufactured by Monsanto, and by-products, residues, or wastes resulting from such manufacture.

PCB-ARCH-EXT0382892

7. Monsanto will not take action or bear the expense to remove and dispose of its manufactured materials which present harm to human health and the environment if the manufactured material was intentional abandonment, mishandled, misused in its application, or discharged to the environment by others in violation of environmental statutes or regulations or instructions given by Monsanto. In such cases, however, Monsanto will supply consultation and advice.

8. Under guidance from EPS, Corporate PR is responsible for managing and coordinating all communications about any environmental and health aspects of discontinued products. EPS will coordinate with Corporate PR all initiatives and responses to media on discontinued products.

PCB-ARCH-EXT0382893

CONDITIONS

1. Monsanto produces products, by-products, and solid wastes, which may, during manufacturing, packaging, transportation, use, or disposal, present a hazard to human health and the environment. Monsanto maintains records, procedures, and technical knowledge for performing these functions in an environmentally safe way.

2. In some instances Monsanto products may be found abandoned in their original shipping containers, or found persistent in the environment after use or disposal.

3. From time to time Monsanto will discontinue the manufacture and distribution of products for any of a number of reasons.

4. These discontinued products may or may not be proprietary to Monsanto. In specific instances it may or may not be possible to identify these nonproprietary products as of Monsanto origin.

5. Government agencies or others may request Monsanto to mitigate alleged hazards from discontinued Monsanto products at locations not owned by the company. Such requests may range from readily answered questions, to historical information, to technical advice, to complete disposal at Monsanto's cost.

6. Efforts may be made to hold Monsanto accountable for environmental and health effects of discontinued products for so long as they exist in the environment.

PCB-ARCH-EXT0382894

PRINCIPLES

1. Monsanto may act in regard to discontinued products either on a voluntary basis or as required by law.

2. In specific cases of alleged adverse health or environmental harm involving materials formerly manufactured by Monsanto, but still manufactured by others, Monsanto will not accept responsibility unless it can be proved that such alleged effects are the direct result of Monsanto-manufactured materials.

3. When a discontinued Monsanto product still exists in the environment and environmental hazard or human exposure is alleged, we will, to the extent of our knowledge and capability, provide reasonable aid to appropriate authorities and other persons by providing counsel about the significance of the alleged exposure, as well as safe handling, and safe disposal practices.

4. We will bear expense to remove and dispose of our manufactured products that may pose a hazard to health or the environment and that have been abandoned in the containers in which they were offered for sale.

5. For all discontinued products we will retain sufficient information regarding use, human exposure, etc., as well as technology of manufacture, safe handling, and disposal to resolve environmental problems.

PCB-ARCH-EXT0382895