

GUIDELINE

PRODUCT STEWARDSHIP

Monsanto's products will not present an unreasonable risk of harm to human life or health, or to the environment when they are properly handled, transported or used.

INTRODUCTION

Product safety evaluations are judgments about the level of risk borne by product users and the general public as a result of manufacture and distribution of a product. They integrate the objective data on the biological effects from and exposure to products, intermediates, and wastes available from sources such as toxicology experiments, epidemiology, medical observations, environmental monitoring, and predictive environmental fate work. They consider possible exposure to our and our customers' employees in their normal working environment, as well as exposure to the general public *via* air, surface water, groundwater, and in formulated products. They also consider effects on and exposure of lower organisms in the general environment. Not all products require the same amount of data to permit an adequate safety evaluation; we need to know enough 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. Judgment by specialists is required in assessing the amount of test data required, for they best know what will persuade their peers in academia and government. (The public commonly relies on government and academic experts for credible opinions.)

PROGRAM

"Product stewardship" includes the responsibility for managing internal information needs and for the effort to assure the public and its representatives that the products Monsanto now markets meet the Guideline conditions. The information needed internally is that required to convince ourselves. The external responsibilities include providing information needed by governments and that useful for the development of regulations, as well as defending products against unwarranted attacks by governments, the press, or the public.

1. The Director, Environmental Operations of each operating company or world area, or designated manager of free-standing divisions, has responsibility for assuring that this Guideline is met. Actions needed to discharge this responsibility include:

   a. Complete adequate preliminary product safety review (TF-837, EC-201, etc.) for new product candidates before samples are shipped for customer evaluation.

   b. Complete an adequate product safety evaluation as described above (EC-202 or equivalent) and a Material Safety Data Sheet before new products, or significant new uses for existing products, are commercialized.

   c. Maintain and review every three years product safety evaluation (as described above) dossiers and Material Safety Data Sheets (G-4048) on all products being sold.

2. Units of the corporate staff (Environmental Policy Staff and others) and operating units are jointly responsible for developing information needed for safety evaluations. This includes regular periodic reevaluation of data available in light of new public concerns or other developments that affect perceptions of safety.

During 1983, we will review present practices for handling off-property spills, leaks, fires, etc., to assure ourselves that the procedures return any information needed for later review of the incident.

(Revised and Approved: Corporate Administrative Committee, February 18, 1983, as Worldwide Environmental Protection Guideline No. 6)

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