now file
"ESH Policies - Product Stewardship"

MONSANTO CHEMICALS UNIT
PRODUCT HAZARD EVALUATION PROCEDURE

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 and used. The Product Stewardship Department in the ESH Unit of the Chemicals Company has the responsibility for the assessment of health hazards, if any, of chemicals the Chemicals Company produces or imports. This includes judging the adequacy of data developed to assure the safety and environmental capability of products and intermediates produced in its workplaces and shipped to its customers. Physical hazard assessments are also carried out by ESH professionals in the Chemicals Company.

As one means of discharging this responsibility, Product Stewardship undertakes an assessment of safety and environmental compatibility of each new chemical or proposed new use of an existing chemical. While not subjected to all features of this procedure, established products are periodically reviewed by Product Stewardship to assure that their hazardous characteristics have been adequately assessed and classified and a Material Safety Data Sheet exists containing health and safety information. Final approval of physical and health hazard assessments will be given by the Team Leader, Product Stewardship or his designate. The Team Leader Product Stewardship will inform the Team Leader, Occupational Medicine of all assessments.

Monsanto will carefully evaluate its products and chemicals for potential to injure humans and /or damage the environment. Product Stewardship will consider as appropriate the following information in its hazard assessment.

1. Product and Chemical Name
2. CAS number (if available)
3. Common names and synonyms
4. Trade names
5. Molecular weight
6. Physical property data
7. Composition including known or expected impurities.
8. Expected major areas of use and volume.
9. Toxicity known.
10. Expected environmental impact from manufacturing process wastes and from product use and disposal.
11. Molecular and structural formula.
12. Countries of production and sales

This information will be used by Product Stewardship to make the hazard determination required by the appropriate Hazard Communication Standard and regulations (Annex I). Of necessity, considerable professional judgment will required in defining the scope of this review. Computer data bases, such as the MSHI.MSDSARIEL Query, will be used to determine the regulatory requirements associated with our products and components of our products.

Product Stewardship will update its MSDSs for products and intermediates it produces or sells/markets as it becomes aware of significant new information. We intend to accept supplier-provided MSDSs as factual and rely on their health and safety information to train and educate our employees , and develop MSDS for products containing these materials.

Apart from the MSDS effort discussed above, it may be noted that some products are also evaluated under other existing laws, such as FIFRA, TSCA, FFDCA, CEPA, EU Dangerous Substances Directive, EU Existing Substances Regulation, etc., and may require different approaches to support regulatory approval and compliance.

July 11, 1997

Annex I
MSDS standards and regulations

Country or region	MSDS standard or regulation	Requirement
USA	OSHA Hazard Communication Standard	Appendices A and B
EU	Commission Directive 93/112/EC	Annex
Canada		
Korea		
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