QUESTION/ANSWER GUIDELINE
MHA/SANTOQUIN/PCB

Q - Does MHA/Santoquin contain any PCB?

A - PCB is not used in the MHA/Santoquin process. They are produced at different locations. We constantly check MHA/Santoquin as part of our quality control program. With respect to MHA/Santoquin, PCB is like any other impurity -- either not present at all, or present only in inconsequential, trace quantities.

Q - We have analyzed MHA/Santoquin and have found small quantities of PCB. Does this coincide with your findings?

A - We have from time to time found minute quantities of PCB. These are measured in parts per billion however, and are of very little concern, particularly since MHA/Santoquin are used in feeds at very low levels.

Q - Is MHA/Santoquin produced at the same location as PCB?

A - No, not even in the same state.

Q - Is there any possibility of PCB being mistakenly shipped in place of MHA/Santoquin?

A - It would be practically impossible.

Q - Are MHA/Santoquin containers similar to PCB containers?

A - MHA is shipped in bags; Santoquin and PCB in drums. The drums may be similar but labels are plainly marked. Since the products are produced at different locations, chances of getting labels mixed up is very remote.

Q - Does Monsanto monitor MHA/Santoquin for PCB content?

A - Yes, we have a routine monitoring program.

Q - Is PCB used in the MHA/Santoquin process?

A - No.

Q - Is PCB used anywhere at the Nitro Plant?

A - No.

Q - Santoquin Emulsion and Mixture 6 are formulated at Travelers Rest, S.C. Is PCB used at Travelers Rest or anywhere in the vermiculite (carrier for Santoquin-6) process?

A - Not that we are aware of.

Q - What levels of MHA/Santoquin are added to fishmeal?	A - MHA is not added to fishmeal. Santoquin is normally added at 1-1½ lb./ton.
Q - To feed?	A - The addition of MHA varies according to its economics in a particular situation, but normally from ½ to 4 lb./ton. Santoquin is added at a rate of ¼ lb./ton with a maximum limit on Santoquin in finished feed of 3/10 lb./ton
Q - Is there a limitation on the amount of Santoquin that can be added to fishmeal?	A - Santoquin may be added to fishmeal at any level necessary to achieve the desired effect (reduction of oxidative heating and protection of nutrients from oxidative destruction), but the recommended level is 1-1½ lb./ton.
Q - Are there any labeling requirements if Santoquin is added to fishmeal?	A - Any fishmeal produced in the U.S. or intended for use in the U.S. must be properly labeled on all tags or invoices to insure that the final finished feed in which the fishmeal is incorporated does not contain more than 0.3 lb. of Santoquin (150 PPM) as supplied by fishmeal and all other sources.
Q - Do you know whether or not foreign produced ethoxyquin contains any PCB?	A - No, we don't know.
Q - Are MHA/Santoquin used for food purposes?	A - No.
Q - Are warning statements required for Santoquin?	A - No; however, feed tags must indicate in the ingredients section: "Ethoxyquin, a preservative".
Q - What is the FDA status in regard to Santoquin?	A - It is a non-drug feed additive under food additive order 121.202

Q - What is the FDA status in regard to MHA?

A - Its status is GRAS (Generally Recognized as Safe) under the food additive amendment. It is classified as a nutrient and/or dietary supplement.

Q - Is there a limitation on the use of MHA in feeds?

A - No; however, its use must conform to good feed manufacturing practices.