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November 4, 1971

Dr. Robert W. Risebrough
Associate Research Ecologist
Bodega Marine Laboratory
University of California
P. O. Box 247
Bodega Bay, California 94923

Dear Dr. Risebrough:

I understand and respect the strong belief you express in your letter dated October 25 that in your opinion we cannot adequately protect the environment unless it is possible to relate PCB production figures and environmental input to contamination levels in fish and other components of the biosphere.

I agree that our responsibilities should include consideration of all other persons who may eventually be affected by PCB contamination of the environment in addition to our employees, shareholders, and customers.

It is with these responsibilities in mind that we have been reluctant to divulge PCB usage numbers to the general public. We are extremely concerned and sincerely believe that the abstract numbers will be misunderstood, misinterpreted, misapplied and in some instances used to arouse emotions to further some self-seeking causes.

To fully comprehend the significance of these numbers one must consider in depth the conditions under which PCB's are manufactured, stored, shipped and used. Quantities escaping into the environment in the past and now must be estimated. The isomer content of each

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commercial PCB mixture must be known and the relative degradability of each isomer must be considered. I am certain you can appreciate the overall complexity of such a study.

Monsanto has been repeatedly accused of callously refusing to divulge usage data. On the contrary, we have on many occasions expressed our willingness to disclose such information to responsible members of governmental agencies on a confidential basis to enable them to correctly establish the present and future levels of PCB's escaping to the environment.

As you are already aware, we have announced publically our intention of supporting and working closely with the Joint Agency Task Force which was established recently to study the PCB problem. We have already attended a series of meetings with Dr. Edward J. Burger, Executive Office of the President-Office of Science and Technology. Dr. Burger is the coordinator of this task force and we have agreed to supply detailed statistical information to enable his group to investigate the present and future build up of PCB's in the environment. We are currently preparing detailed information of U.S. manufacture, sales, and usage patterns for PCB's covering a period of several years. This information will be amplified by detailed discussions with Dr. Burger and his colleagues to supply them with the maximum amount of information which will enable them to complete their studies.

We believe the actions we are now taking in cooperating with the Joint Agency Task Force are in the best interests of the general public and we are certain that when the work has been completed information will be made available to the public as part of a complete and thorough scientific study.

Sincerely,

JMA Cox

W. B. Papageorge, Manager
Environmental Protection

/jf

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