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ENVIRONMENTAL DEFENSE FUND

2728 DURANT AVENUE, BERKELEY, CALIFORNIA 94704/415 548-8906

October 27, 1971

Mr. W.B. Papageorge
Manager, Environmental Control
Monsanto Company
800 North Lindbergh Boulevard
St. Louis, Missouri

Dear Mr. Papageorge:

We wish to register with you the grave concern of the Environmental Defense Fund over Monsanto's refusal to make available to the scientific community production and usage data in respect of PCB. Accordingly, we join in the request made of you by Dr. Robert Risebrough, under date of October 25, 1971, that Monsanto reconsider its position in this matter.

We are advised that in a letter to Dr. S.G. Herman dated April 6, 1971, you suggested that PCB production and use figures were "sensitive marketing information", and that, in any event, the problem was one of worldwide concern, as there are producers in eight foreign countries. Since, as we understand, Monsanto is the sole domestic producer of PCB, release of the data would not seem likely to affect Monsanto's position in the domestic market. Accordingly, we question whether the figures are as "sensitive" as they might otherwise be.

Moreover, to the extent that the problem is indeed world-wide, we should be pleased to join with you and other concerned parties in attempting to secure foreign production data through the offices of the Department of State.

The possible dimensions of the contamination problem with respect to PCB can be evaluated rationally and calmly only if all the relevant data are made available. Conversely, continued secrecy where important data are concerned can only operate to produce scientific guesswork and unnecessarily severe regulation of PCB production. Surely it is in the interest of no one - least of all Monsanto - that this should occur.

Yours truly,

Michael W. Palmer
Staff Attorney

cc: Rep. William Fitz Ryan
Senator Gaylord Nelson
Senator George McGovern
Dr. Robert Risebrough
Dr. Charles Edwards
Members of the Board of Directors

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Mr. F.M. Eaton
20 Exchange Place
New York City, New York

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