

JUN 18 1991

Monsanto

(From: Name, Location, Phone) J. E. Downes - G4WR (4-2918)

Date: June 17, 1991
cc: F. E. Kearney - G4WT
R. S. Nair - A3ND
Subj: PDCB
R. G. Pier - G5NA
L. W. Wassell - G4WF
Ref: M. W. Winkel - G5NA
To: S. L. Foster - A2SP

Further to our conversation a few days ago, I have attached a copy of the Chlorobenzene Producers Association White Paper on para-Dichlorobenzene. Monsanto, and other members of the Association, firmly believe that the tumors found in the studies done by the National Toxicology Program are not relevant to humans, thus PDCB should not be identified or regulated as a "carcinogen".

NTP has listed PDCB as a "substance which may reasonably be anticipated to be a carcinogen" in their latest report. In doing so, they considered only their study results, refusing to even consider the array of scientific information presented to them.

The white paper discussed EPA's conclusion after their review of all available data that they would not regulate PDCB as a carcinogen. Since publication, several other regulatory organizations throughout the world have come to the same conclusions.

1. The World Health Organization's International Program on Chemical Safety (IPCS) has evaluated PDCB and stated the tumors are "unlikely to be relevant to humans".
2. The European Community has reviewed the data and decided not to require cancer warnings on EC labels.
3. The Swedish regulatory body KEMI rescinded a proposal to ban consumer uses of PDCB when presented with the information in our white paper.
4. EPA has proposed an agency policy stating that any tumors for which there is mechanistic evidence similar to that shown for PDCB will be disregarded in their risk evaluations.
5. Consumer Product Safety Commission has proposed an evaluation system in which they would discount tumor findings for which there is mechanistic evidence (such as we have with PDCB) that the tumors are not relative to humans.

DSW 136666

STLCOPCB4036626

June 17, 1991

In summary, we have had an intense and lengthy program to develop scientific evidence and to convince regulators that if they use that evidence, they will conclude PDCB is not a human carcinogen. We appear to be succeeding on scientific merits, specifically for PDCB and generically for several chemicals. I encourage you to use this white paper as your discussions with the media evolve into questions concerning PDCB. Let me know if I can help.

J.E. Downes/jes

J. E. Downes

JED/jes

Attachment

DSW 136667

STLCOPCB4036627