

# EXHIBIT 21

AUG 29 1985

FROM  
(NAME-LOCATION-PHONE)

Lyle L. Gingerich - 1920

return FS

DATE : August 20, 1985

SUBJECT : Roundup S.A.P. Meeting

REFERENCE :

cc. C. T. Dickerson, Jr./File

TO : T. F. Armstrong - C2SC  
E. E. Debus - C2SC  
F. S. Serdy - C2SC

If the results of the kidney re-sectioning do not resolve the glyphosate issue within OPP, we will be faced with an adverse OPP decision. It is likely that OPP will ask the S.A.P. for concurrence on its determination that there is a treatment-related effect in the glyphosate mouse study.

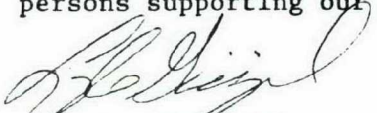
I expect the questions to the S.A.P. will be narrowly crafted and we will have a minimal time to prepare a response to the questions. The EPA's intention to take no regulatory action should work in their favor. The S.A.P. could reluctantly agree that there is a treatment-related effect and take comfort in the fact that no action is planned over such an insignificant risk.

Can we change the focus of the questions to the S.A.P. to: "Is 30,000 ppm too high to be used in a meaningful risk assessment?". Do we have examples of any other pesticide being fed at such a high level? If we assembled 10 respected toxicologists, would all ten agree that the feeding level is too high to be meaningful?

If so, I recommend that we bring all ten of the toxicologists to the S.A.P. meeting. There is a tendency to "count the votes" at S.A.P. meetings. We can make a difference by lining up a large number of experts on our side.

Dr. Moore and Dr. Farber may be misreading the consensus of their professional colleagues on this issue. With the importance of this decision to Monsanto, I don't think we can leave any doubt in the minds of the EPA or the S.A.P. of what the consensus of the professional toxicologists is on this issue.

I would also recommend that we place the names of each of our supporting toxicologists on the written agenda for the S.A.P. meeting. All of the S.A.P. members read the agenda and would take note of the names of the persons supporting our position.



Lyle L. Gingerich

/ms

Monsanto

16 29 1985

FROM  
(NAME-LOCATION-PHONE) E. J. Brandt C2SM 4-5408

DATE : August 27, 1985 cc: A. G. Barnett/C2SD  
D. K. Flaherty/EHL  
SUBJECT : L. D. Kier/EHL  
T. J. Long/G2WD  
REFERENCE : W. E. Ribelin/EHL  
TO : E. E. Debus/C2SC

On August 27, a meeting was held (attendees - Brandt, Flaherty, Kier, Long) to explore the potential role of immune system dysfunction in development of observed kidney pathology in male CD-1 mice exposed long-term to high levels of glyphosate in their diet. After considerable discussion, it was concluded that:

1. Another meeting of the group should be convened after the results of the ongoing slide re-reading are available (late September).
2. Pending the outcome of the slide re-reading, the group will determine whether or not it would be useful to prepare a draft research proposal designed to address the occurrence of kidney tumors in CD-1 mice from an immunologic perspective.
3. In the interim, various technical questions which surfaced during our meeting discussions will be searched in order to help expedite development of a research proposal should one be considered appropriate after the slide re-reading results are known.

I will keep you apprised of our activities in this area.



E. J. Brandt

/ac

EJB2/8/27/85