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Your ref Our ref PS/db

CHEVRON CHEMICAL CO. ORTHO DIV. R & D DEPT.		
NOV 17 '76		
1	J. N. Ospenson	
	J. Abell	
	C. M. Crutchfield	
cc	A. V. Feriman	
cc	H. G. Franko	
	G. F. Newkes	
	L. W. Nya	
cc	J. R. Quenberry	
	C. K. Redus	
cc	L. R. Stetzer	
	C. K. Vasak	

Telex
Sent
11/30

1. P. C. FILES



Imperial
Chemical
Industries
Limited

Plant
Protection
Division

Date 3 November 1976

Dear Nils

John Braunholtz has asked me to let you know about the global policy decisions on the emetic formulation taken at the recent PPD Board Meeting.

- 1 Emetic formulations of paraquat will be marketed worldwide as soon as is practicable - by early 1978 in most countries.
- 2 A registration petition will be submitted to the UK authorities at the beginning of November.
- 3 Other countries where introduction will be sought in 1977 are all the countries of Western Europe, Australia, New Zealand, Malaysia, Indonesia, Japan, Brazil and South Africa. Immediate introduction in Western Samoa will be arranged.
- 4 PP796 will be incorporated into Weedol, Pathclear (our Garden Products formulations) and paraquat mixtures with residuals as soon as practicable.
- 5 Overseas companies will commence discussions with registration authorities as soon as it is appropriate with the objective of seeking to ensure that the emetic is the sole paraquat formulation allowed to be sold.
- 6 A publicity statement about the new formulation will be prepared as soon as possible with a view to releasing it in the UK and Eire at the time of launch. No publicity announcement is believed necessary outside those countries.

A few more details about some of these points.

You asked to see the submission to the UK registration authorities before you go to the EPA. We intend to submit in the UK within a week or so and Alan Calderbank will be able to arrange for a copy of the submission to be



Date 3 November 1976

sent to you shortly afterwards. If all goes well we expect clearance in the UK early in January, and would aim to begin marketing from the middle of the year

You may be surprised to see Western Samoa on the list of countries for early introduction. The reason for this is that there has been a regrettably high incidence of suicides with paraquat there, and we believe that an early introduction, coupled with reclaiming of much of the existing stocks from the market, would enable us to substantiate our belief that the new formulation will overcome the problem.

I understand that you touched on the subject of publicity in your conversation with John. I am sure that you can understand our desire to keep the new development as quiet as possible for as long as possible. However, we acknowledge that news about the new formulation is bound to become public some time in the next few months. This could come about in a variety of ways - "leaks" from the co-operators involved in the UK trials, from process workers in ICI, from registration authorities, from the Poisons Centres and medical profession more generally. We are therefore going to prepare a publicity statement for use in the UK and Eire when it becomes necessary. However, we do not expect to produce a fanfare of publicity even in these countries: elsewhere we do not believe that general publicity is desirable or necessary - since paraquat is not believed to be a problem by the general public in most countries outside the British Isles. In general, we believe that no label changes will be needed (with the exception of a clear distinguishing mark for identification purposes) although we shall need to modify the booklets on treatment methods.

I believe that you see the best timetable for introduction of the new formulation in the US as being: submission of information claiming PP796 as an inert within the next month or two; additional studies required by EPA (including residue and efficacy work ?) during 1977; submission of modified formulation in late 1977, followed by clearance in early 1978 allowing sales in late 1978.

Finally I should like to mention the impurities in Taiwanese paraquat which we discussed in July in San Francisco and at Jealott's Hill in September. We have had PPD Board approval to make use of the information so far obtained. This indicates that Taiwanese material contains a range of impurities which fluoresce when exposed to UV light (and which, in the case of most samples, includes 2,2',6',2"-terpyridyl which has very unpleasant toxicological characteristics). You have told us something of the activities of Union Taiwan Co in attempting to register paraquat. We have recently had a paraquat sample from that company (obtained from Canada) and it is in the process of being analysed. The information obtained would presumably be used with advantage to counter registration in the USA. We believe that the best time to do this would be when (and if) Union Taiwan approach you to ask permission to use your toxicological and other registration information - which we understand they will be forced to do (unless they generate their own results) if they intend to proceed with registration. Do you agree ?

Best wishes

Yours sincerely



P Slade

PP/F/58