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Date

13 October 1977

PARAQUAT/PP796 : RECLASSIFICATION

The main point of my memo of 5 October, that it would be undesirable to seek actively more favourable toxic classifications for 'Grammoxone' containing PP796 until clinical evidence of its efficiency is forthcoming, has been widely discussed.

As a result, this view has been upheld and it has been decided that,

- a) No approach will be made to a regulatory authority with the direct object of seeking a more favourable classification until a body of evidence is available to support such a move. Dr Keir Howard, CTL and RATLS are already actively monitoring all paraquat incidents in the UK and Ireland, partly to meet commitments to the respective authorities but mainly to amass data that can, we hope, be used to demonstrate the practical value of PP796. We have two years (until April 1979) in which to meet the UK PSPS commitment but to date there has, predictably, been no known case in which 'Gramoxone' containing PP796 has been swallowed.
- b) If, however, a national authority is prepared to offer an exclusive or otherwise favourable position to 'Gramoxone' because of the inclusion of the emetic we shall, of course, be free to take it. This situation is likely to arise in Ireland if discussions now under way between the Department of Agriculture and ICI (Ireland) end satisfactorily. My own view remains; that a guardian of the public health is not being sufficiently mindful of his responsibility if he concedes reclassification without field evidence of the benefits that may accrue.
- c) The letter that I proposed writing to European agents will not be written; each case will be discussed as it arises. The exception will be Holland as ICI (Holland) have already raised with me the possibility of seeking a more favourable classification for 'Gramoxone' and, by copy of this memo, I am appraising Ir Anema of the Division attitude.

R. D. Wiseman

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