

From
Dr S E Jagers
Regulatory Toxicology Manager

ICI Central Toxicology Laboratory
Alderley Park
Macclesfield Cheshire SK10 4TJ

To
Dr J R Heylings

Tel: 0625 582711
Telex: 669095/669388
Fax: 0625 582897
Directorate Fax: 0625 590250
EDT: UKBLA99::SEJ1

Copies to

Your ref	Our ref	Direct line	Tel ext	Date
	SEJ/LMM	0625 512818	2818	26 Apr 91

John,

EMETIC INCLUSION LEVELS

Thank you for your letter of the 9th April and the background information. It is quite routine for the Laboratory to review its data base on any topic from time to time and I confirm that I believe the time is appropriate to review the Laboratory recommendations on the inclusion level of the emetic PP796 in Gramoxone

As you state in your letter it is important that we provide the very best advice at this point as the Business is considering sanctioning a new emetic plant. It is my initial impression that the review will not change the direction of the existing CTL recommendation but alter the force with which the case can be put.

After briefly reading the papers that you sent me and some of the past exchanges of letters on the subject I must re-emphasize my view that any review must be positive - in the sense that it is conducted looking forward. I believe it will always be difficult to look back over 15 years and decide whether a decision was misleading or prudently conservative - particularly when it was not made with the benefit of your own data.

Nevertheless I am committed to a re-evaluation of all the existing pertinent data. From our discussion I know you have your own clear opinions. In order to provide an overview I have asked Dr Oliver to chair a small team consisting of your self and Dr Scott (as Paraquat Product Manager) to address the existing data. He has accepted the task. I am writing separately to Dr Oliver to initiate the process formally.



S E Jagers