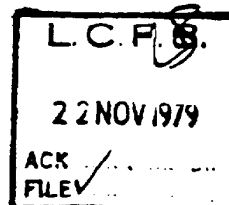


D.J. Wood

DJW/JP/46D-5

21st November, 1979

D.H. Beese, Esq.,
Assistant Director,
Tobacco Advisory Council,
Glen House, Stag Place,
LONDON, SW1E 5AG.



Dear Derek,

RIDOMIL

You 'phoned me on the 19th November to say that Mr. Ted Raytrowsky of the C.T.M.C. would like to know what precise information T.A.C. require in relation to Ridomil, so that he can advise Ciba-Geigy.

I have been in touch with Mr. J.G. Burgan and Mr. A.B. Naish of Imperial, as a result of which we can state the requirements as follows:

1. Toxicology

EPA's proposed guidelines, as they relate to the registration of pesticides for use on tobacco, should be followed. These will be found in document T 8058, subpart D, section 163. 64-1 "Pesticides on Tobacco" (on page 29724), and in document T 8059, subpart F, section 163. 82-4 "Subchronic Inhalation Toxicity Study" (on pages 37371 to 37374). An essential point about section 163. 64-1 is that all pyrolysis products derived from Ridomil that occur in the smoke from Ridomil-treated tobacco at a level of 0.1 mg/kg dry tobacco or more must be identified, and the subsequent inhalation studies must utilise the smoke from Ridomil-treated tobacco. An essential point about section 163. 82-4 is that the inhalation test should be of 90 days' duration, and that animals should be exposed for 6 hours a day and 5 days a week (see paragraph (5) on page 37371).

Commenting on the above, I have pointed out to Imperial that although the guidelines go into great detail on some matters they give no guidance on the exposure of animals to tobacco smoke beyond the bald statement "... subchronic inhalation studies utilising the smoke be conducted." Imperial's reaction is that if Ciba-Geigy question this point we should refer them in the first instance to the EPA, and if that still does not clarify matters sufficiently there should be enough information among our member companies to enable us to make fairly precise suggestions to Ciba-Geigy. It is

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of course always possible that the inhalation test that Ciba-Geigy say they are carrying out already conforms with the EPA guidelines.

2. Taint Effects / Residue Levels

Statements have been made to the effect that treating tobacco with Ridomil confers no taint on the cigarette smoke. Other statements make it clear that measured residues of Ridomil can span a large range depending on the method of application and the dosage level. It is essential that we know to what residue levels the "no taint" findings relate, and it would be an advantage to know at what residue level a taint begins to become apparent (if indeed over-dosage does lead to a detectable taint).

I think it is quite likely that work currently in hand by the Canadian companies will answer the first part of this question, if not the second. Presumably Ted Raytrowsky will be a party to the information when it becomes available.

Yours sincerely,



D.J. WOOD

Not on original:

c.c. Dr. L.C.F. Blackman ✓
Dr. D.G. Felton
A.C.S.C. File

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