National Health Federation

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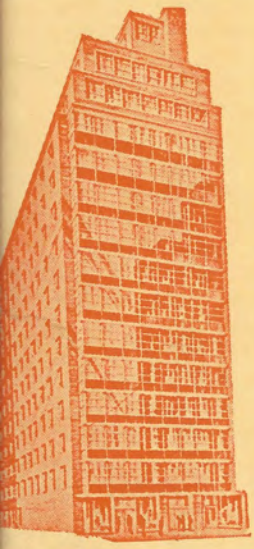

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VITAMIN REGULATION PROGRESS REPORT NUMBER

AMERICANS CRUSADING FOR BETTER HEALTH

Volume VIII — Number 11 **November, 1962**

BULLETIN

Family Circle

By FRED J. HART

This issue is so full of important information that the Family Circle will have to be very brief and to the point. We had intended to print the entire program of the eighth Annual Meeting and Convention in this issue, but space will not allow. We promise you that it will appear in detail in the December issue.

This issue will bring you the ballot for the Board of Governors, inside back cover, and the ballot for the adoption and suggestions for the coming year's program, inside front cover. Please do not put off marking these ballots and mailing them in. Each is on a separate post card and each card will require, because of its size, a four-cent stamp instead of a three. (The perforation is in the fold, so a pull will detach them.)

The work at Washington has been the best in the history of the Federation. Bills which have been introduced and not acted upon by Congress will be reintroduced into the next session of Congress. That is the way of all legislation; it sometimes takes as many as six to eight sessions of Congress before a bill can be acted upon by the entire Congress. Each session you make more friends for the idea contained in a bill, until a sufficient number of legislators believe in the ultimate objective of the bill to bring it to the floor of the Congress. Please do not be discouraged. The difference between success and failure in life is the ability to be like a postage stamp. "A postage stamp sticks to a matter until it brings it to its desired destination."

Life Memberships. We will have, by the time you read this item, one hundred of our goal of 300. It is imperative that we reach the entire goal of 300 by December 31 this year. There are at least one thousand of our members who are financially able, with a little sacrifice, to become life members at the rate of $100. Once a person has paid this sum, there will be no more dues required for him, and such a person will automatically belong to the THREE HUNDRED CLUB. Come on in, the water's fine!

Booth space for the annual meeting will be limited to 25, and as always will be in the room where the lectures are held. Plenty of recesses will be had, to enable the delegates to shop at the booths. The rates for the booths from number 1 to 15 will be $50, and from 16 to 25 the rate will be $40. Anyone desiring a booth should write at once for a floor plan. First come will be the first served.

The Herald of Health. There appears to be some confusion in the minds of some of the Federation's members as to who owns the **Herald of Health.** The **Herald of Health** is owned by the Herald of Health Publishing Company, which in turn is owned by Don Matchan and his wife. These two are the sole owners. The National Health Federation is an entirely separate corporation and has no control over the publication. The Federation has worked very closely with the **Herald of Health,** due to the fact that it has been, until this year, the only national health publication that boosted the Federation or tried to get behind the program of the Federation. During recent months this attitude on the part of other publications has changed and we are very happy about it. We shall work as closely with these other publications as they will allow, but we do not expect them to allow the Federation to have anything to do with the content of their publication, any more than we have had with the **Herald of Health.** I trust this item will correct

(Continued on page 24)

Place 4¢ Stamp Here

National Health Federation
P.O. Box 686
211 West Colorado Boulevard
Monrovia, California

From.....
City.....
State.....

REMARKS OR ADDITIONAL PROJECTS

National Health Federation Suggested 1963 Program

☐ FOR—Pure food, water, air, and beverages.

☐ FOR—Mental health freedom.

☐ FOR—Honest, fair and efficient law enforcement in health matters.

☐ FOR—Freedom of choice in all matters relating to health.

☐ FOR—A bill, to be reintroduced, which would deny tax benefits to any charity organization soliciting funds on a nationwide scale, or connected with a nationwide organizational drive for health purposes, unless, previous to such solicitation, a detailed budget, or financial report, shall have been submitted to the Internal Revenue Department, and unless such organization shall hold its books open to audit by the Federal Revenue Department, should such audit be deemed necessary. This is similar to the requirements of Community Chests and United Fund Drives. It is the feeling of your organization that the passage of such a law will (1) remove the present objection of such organizations taking part in Community Chest and United Fund Drives, and (2) will stop the apparent waste of funds collected from year to year. The only financial report such organizations now file is a very, very brief one, which does not answer any of the questions to which the public has a right to know the answers. This bill should have the support of all right-thinking men and women everywhere.

☐ FOR—a bill, to be reintroduced, designed to set medical doctors and medical researchers free to care for the sick and to search for remedies to humanity's ills. This bill is simple in nature and long overdue. The bill will deny tax benefits to any medical facility in the United States which discriminates in its service or the use of its facilities because a medical doctor, with a proper state medical license and associated qualifications, belongs to or does not belong to the County, State or National Medical Association, etc. There is no justifiable reason why your medical doctor cannot practice in or use our medical hospitals and institutions if he holds a proper medical license in good standing. This bill is also in keeping with the purpose of the National Health Federation, to wit, medical freedom.

☐ FOR—An amendment to the Federal Administrative Procedure Act in line with the recommendation of the Hoover Commission, which reads as follows: "Agency publicity found by a reviewing court to have been released for the purpose of discrediting any person under investigation or a party to an agency proceeding may be considered by the court as a prejudicial prejudging of the issue, and the court may set aside any agency action against such a person or party or enter other appropriate order."

☐ FOR—A thorough investigation of the Food and Drug Administration by the Senate Anti-Monopoly Committee on the ground that its activities appear to be promoting a medical monopoly.

☐ FOR—Legislation which will provide that when federal money is involved in the training of individuals, or aiding institutions for the education of individuals in the art of healing, there shall be no discrimination as between the different schools of healing, regardless of whether they are medical or drugless.

☐ FOR—Legislation, both state and national, which will protect the constitutional rights of individuals in relation to mental health matters. Improperly handled, the mental health program, as now being pushed in the United States, could destroy the American way of life. The National Health Federation will be active in this matter, in the county, the state, and the nation.

☐ Against all legislation and/or regulations in the health field which are not in the best interests of the public.

☐ Organize and promote a "National Youth Health Club Movement," patterned after the 4H Club idea.

☐ Organize a Health Speakers Bureau, the purpose of which would be to provide competent speakers on diet and other health matters. The medical monopoly and the Food and Drug Administration are rapidly driving our well-known health speakers from the platform.

☐ Organize a Litigation Bureau, the purpose of which will be to initiate litigation against any group which is a monopoly or works toward the creation of a monopoly in the health field, or which takes unjust or illegal action against an individual, corporation or organization in the field of health.

The space before each of the foregoing is left blank. Please write a numeral before each of the projects to indicate the order of importance of these projects as you see the picture. This information is needed by the Board and Federation staff, to the end that they may chart the coming year's work in accordance with your wishes.

Please Rush

These cards should be in the hands of the Federation by December 15 in order that they may be tabulated in time for Board action on January 2, 3, 4, and 5, 1963.

The
NATIONAL HEALTH FEDERATION
BULLETIN
VOLUME VIII — NOVEMBER
NUMBER 11 — 1962
Adventures on Health Frontiers
Published Monthly

FDA Options on Dietary Foods Law Revision After October 18

By CLINTON MILLER
Assistant to the President of N.H.F.

Hundreds of thousands of protests have been received by the Hearing Clerk on the proposed FDA revision of the dietary foods law. There are boxes and boxes of cards from N.H.F. members and their friends which have been forwarded to the Hearing Clerk by your Congressmen. There are excellent statements from attorneys, biochemists, nutritionists, professors, doctors, etc. The comment is almost unanimously opposed to the revision. Several of our most prominent universities' letterheads are apparent in the files, and their spokesmen have strongly opposed the change. Following an extensive examination of the files, I interviewed a top FDA official to determine and report to you their next move.

He was very co-operative and helpful, and outlined four possible alternatives open to the FDA.

1st Option: Withdraw the proposals, write a new set, and start all over again at some future time. If the officials at the FDA feel, after reading the comments and evaluating the public and Congressional response to their initial proposals, that it would be better not to try to change their first draft to accommodate and include constructive suggestions, they may withdraw it entirely, and substitute a brand-new proposal.

Under this first option, they would naturally be guided by the helpful and constructive comments that have been filed with the Hearing Clerk. **They are really desirous of receiving advice. They expect it. They encourage and invite it.** The first proposal is written as a rough draft, and they fully expect to change it as constructive criticism is received. It takes considerable time to evaluate and incorporate the comments after the deadline. When so many sound and reasonable suggestions are considered that it makes the original proposal obviously unsuited to build upon, amend or change, this first option is indicated. The FDA would substitute a brand-new proposal after withdrawing the first one, and the whole procedure would start all over again.

2nd Option: Drop the matter entirely. This is a tacit admission that they have pulled a "boo-boo" (made an honest mistake). **Use of this second option is not uncommon among governmental agencies.** Their officials are humans, and are just as prone to make errors of judgment as all the rest of us are. It is no disgrace to admit that an error was

(Continued next page)

made. The law anticipated just such a possibility, and made provision for it. In America it is not required that anyone commit "hara-kiri" when this happens. **This is standard procedure in Washington, and takes place every day, as sincere government officials do their best to accommodate, apply, and interpret the laws and regulations made for the citizens of America by their Congress and federal agencies.**

As long as we find erasers on pencils, it is in good fashion to make mistakes and correct them, whether one is in an official capacity or not. There is no loss of face in such an action, nor is any apology required. No one must "eat crow."

Make radical changes

3rd Option: Make radical changes which accommodate most people, and if hearings are granted, further modify the rulings till every major objection is satisfied.

4th Option: Make small, or no changes in the protested ruling, leaving it basically as it (FDA) sees fit, and let it go to hearing, court, and appeal. The FDA only takes this 4th option if it feels that the protests are unreasonable, unfair, and not in the public interest. **The key official I contacted indicated that they had already received many sound and helpful suggestions.** The possibility that the 4th option will be followed is almost nil.

It is important that we understand these accepted procedures that are taken by all Federal agencies in their administration of the broad general laws that Congress passes. **These options were wisely provided for them by Congress, which intended that they should use any one with equal dignity and fairness.**

Far more laws that regulate our everyday lives have been "passed" by this process than Congress has passed in its entire history.

If FDA chooses any of the first three options, it is obvious that there will be no need for costly judicial review and appeals. By far the overwhelming majority of regulations which are strongly protested result in the choice of one of the first three options. The choice is naturally and properly up to the FDA. **The official I contacted indicated that he was aware that many sound, logical and scientific suggestions had been received.** I will be very surprised if the FDA does not choose one of the first three options. I further predict that this matter will be ironed out to the satisfaction of those who have protested without having to resort to costly court action.

POST CARDS were "ON TARGET," timely, and effective

The steady torrent of post cards has poured through Congress to the FDA. Every Congressman is aware of the proposed revision, and is alerted to your protest. Some have believed the "fact sheet" sent to them by FDA, and have forwarded this to you, their constituent, as part of their reply. **But many of you, upon receiving this, have sent additional information to your Congressmen, or insisted that they contact your N.H.F. Washington Office, and when they have, they have changed their attitude to the FDA, and have lodged strong protests.**

In answer to those who ask if it is not better to write personal letters, we answer, most certainly, yes. But it doesn't follow that it is not good, and very good at that, to sign and mail a form post card. Here are just a few post-card benefits:

1. Every post card is a "ballot" and is a vote against the proposed dietary food law revision.

(Continued next page)

National Health Federation Bulletin, published monthly January through December, at 211 West Colorado Boulevard, Monrovia, California, by National Health Federation, a nonprofit corporation. Fred J. Hart, Editor-Publisher. Subscription rate of $3.00 per year included in membership dues. Single copies 25¢. Second-class postage paid at Monrovia, Calif.

2. Although the person who signed and sent the post card was too busy at that time to study the regulation and make a long detailed argument for his point, it indicates that he may potentially be stimulated to take time to do just that.

3. It alerts your Congressman (and FDA officials) to the fact that there is strong, nationally **organized opposition** to the revision.

4. It **warns** the official responsible for the ruling that you, as a citizen, are not indifferent or apathetic to his exercise of authority, and will be watching it to be sure it is fair and reasonable.

5. It announces your intent to keep your Congressman informed of developments.

6. It indicates that you encourage the official to choose one of the first three options available to him to modify the first rough draft.

If Second 120-day Extension Denied

If FDA doesn't extend the deadline past October 18, this is not necessarily a bad sign. It may be that they have already noticed enough sound, scientific comment to convince them that they should take one of the first three optional steps.

One of the best comments that has been filed was filed by Dr. Roger J. Williams, who is Professor of Chemistry at the University of Texas and Director of the Clayton Foundation Biochemical Institute.

Hearing Clerk August 2, 1962
Department of Health, Education, and Welfare
Room 5440
330 Independence Avenue S.W.
Washington 25, D.C.

Dear Sir:

I respectfully submit that the proposal to revise regulation of food additives, etc. (Federal Register p. 58-5-8) is open to serious criticism from the scientific standpoint because it fails to take into account recent advances and changing concepts which are pregnant with possibilities for the betterment of health.

Four areas of advancement which have virtually been left out of consideration are: (1) biochemical genetics, (2) cellular nutrition, (3) biochemical individuality, (4) the genetotrophic concept of disease. These, taken in conjunction with each other, give nutritional science an entirely new and different outlook from that held by many who have taken a more superficial view of nutrition.

Physicians in general are not in a position to evaluate these developments critically; only those whose researches carry them into these frontiers can do so. Those physicians whose training is in the immediate past may have some appreciation of the potentialities of these newer concepts, but these developments represent an opening door which must be allowed to open, a most desirable end that will be seriously thwarted if the proposal is adopted.

The principle of **insurance**—a universally used, common-sense one—appears to be outlawed by the proposal. We do not buy fire insurance because we **know** we are going to have a fire, nor do we buy life insurance when we **know** we are about to die. We do not fasten seat belts because we **know** the plane or car is going to be involved in an accident, nor does a baseball player at bat wear a protective cap because he **knows** that he is going to be hit on the head by a pitched ball. Yet this proposal says in effect: "You cannot take a supplementary vitamin such as pantothenic acid as insurance against ill-health; there is no proof that you are going to be deficient."

Back of the proposal is the valid idea that foreign chemicals (drugs) are suspect and their safety needs to be demonstrated before they are used. But amino acids and vitamins are **not** foreign chemi-

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cals; they should not be suspect; in reasonable doses they should be considered innocent until they are proved guilty.

Also back of the proposal (and the supposed reason for limitations on the amounts of vitamins allowed) is the idea that excessive amounts may be harmful. While it is unquestionably true that some nutrients, minerals, for example, may be highly toxic if given in large doses, and also that excessive amounts of individual amino acids may be damaging, vitamins are **unusually safe** except when given **far** in excess of the needs. If vitamins, in reasonable doses, had been found unsafe, their sale would long ago have been restricted and they would have been made available only by a physician's prescription.

While many times we hear about the "toxicity" of vitamin A, for example, the scientific evidence that it is toxic to humans when given in reasonable doses is nonexistent. If there is even circumstantial evidence that it is toxic at levels of 50,000 units per day or less, I do not know where the evidence is to be found. *(See footnote page 8.) The ridiculous lengths to which efforts to **prove** that vitamin A is toxic have gone is illustrated by an experiment in which rats developed sore eyes and other untoward symptoms as a result of being given excessive amounts. Actually, the "excessive amounts" given were 10,000 times what rats are thought to require! Translated into human terms, this would mean: "Don't take **one thousand** 50,000-unit capsules of vitamin A a day (cost about $65.00) because it may give you sore eyes and make you unwell!"

The case of vitamin A is particularly interesting from the standpoint of the four major areas mentioned earlier. The requirements of vitamin A for human beings, in the light of modern knowledge, **are not known**. For thirteen years, from 1932 to 1945, Mead Johnson and Company offered each year a $15,000 award to anyone who would determine how much human beings need, but there were no takers. At the end of this period the seasoned judges advised the donors to withdraw the offer because no answer was forthcoming and "no adequate answer . . . will result from current research."

I am aware that official bodies who traditionally make educated guesses and set figures for "minimum requirements" or "recommended allowances" perform their function. I have been a member of the Food and Nutrition Board and am aware of their difficulties. They would now lean toward stating **ranges**, but unfortunately they do not know what the ranges are!

The reasons for the difficulty involved in establishing quantitatively the vitamin A needs of human beings became apparent with the publication of my book, **Biochemical Individuality,** in 1956. It seems probable that in the case of vitamin A there is an unusually wide range of individual human needs, perhaps 10- or 20-fold or more. In rats there is about a 30-fold range, depending only upon one's criterion of "need." Here the implications of cellular nutrition and of differences in the needs of different cells come into the picture. (See 143-6 in **Biochemical Individuality.)** The top dosage of vitamin A allowed in the proposals (7,500 units per day) is far too low in the light of these facts.

Pantothenic acid, a vitamin which the writer discovered, is one from which no harm is likely to come. It has been given to human beings by a physician at levels 1,000 times the estimated need for a six-week period without any ill-effects. Yet the proposal would, as I understand it, prohibit its use as a nutritional supplement for insurance purposes even at levels 1/500 of that known to be safe.

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The effect of the proposed rulings would be to discourage research and investigation. How would my research morale have been affected 25 years ago if I had known in advance that the vitamin which I was investigating would later be almost completely restricted in use without any good reason? The answer is obvious.

Actually there is good reason to think that human beings have an unusually high need for pantothenic acid, and that, especially in times of stress, deficiencies may be common. When we gave mice an extra supply of pantothenic acid—they were already getting what was supposed to be plenty of it—they lived 18 per cent longer. A comparable experiment has not been carried out on human beings, but there is no reason to think that the result would be less favorable. Yet because conclusive evidence is not available, pantothenic acid is to be banned from use.

One point which I am not at the present moment able to document is that if this proposal is adopted it will probably be illegal for people to give themselves and their children as good nutrition (vitamin-wise) as they give their farm animals and pets. Supplementation with pantothenic acid is common in animal feeds. Yet, as suggested earlier, there is circumstantial evidence that human needs for this vitamin are higher than animal needs. For further material on this and evidence that my interest in pantothenic acid is not monetary, see chapters IX and X in my **Nutrition in a Nutshell,** Doubleday, Dolphin Book (in press).

Biochemical genetics tells us that the metabolism of each individual is distinctive. Abundant evidence shows that this distinctiveness is **high** in degree. Nutritional needs are distinctive, too. It must be supposed that the variation in human needs for specific items is high, but the ranges are not known. The proposal under consideration would be most unfortunate in its effect on research in this area, because research to determine what the ranges in nutritional needs are is sorely needed, yet the proposal carries the invalid assumption that the ranges are already established.

Cellular nutrition has now advanced through tissue culture studies. It is now known that every cell and tissue in our bodies can be nourished at different levels of efficiency and that many obscure ills of every description may be due to cellular malnutrition.

Biochemical individuality is real and compelling. My book on this subject (1956) has been digested by few but is drawing more and more attention. It is now in its third printing. It has been chosen this year by the Library of Science as a basic book to be distributed to its book club members. The genetotrophic concept of disease (**Lancet,** 1950) embodies the idea that because of individual genetics (this includes the cells and tissues) a person may be prone to have a disease because of unusually high nutritional demands for certain nutrients; however, if these demands are met, the individual may be free from the threat. Because of this concept, nutrition takes on new meaning and brings new hope. The undue restriction of the use of vitamin supplements will thwart the testing of this compelling concept. One of those who, I believe, sees the inescapability of this idea is Karl Folkers who is currently president of the American Chemical Society.

One of my main subjects of research in recent years has been the disease, alcoholism. In my book, **Alcoholism: The Nutritional Approach,** I have set forth the most hopeful note for the combating of this disease yet presented. This has not been accepted wholeheartedly by the medical profession because psychiatrists, who are not biochemically

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oriented, have been in charge. This investigation needs to continue and the use of nutritional supplements needs to be explored more and more in this connection. Such investigation and trial application of what cannot yet be demonstrated beyond doubt must go on. It will be seriously hampered, however, if the proposed regulations go into effect.

Those who are conversant with the four major areas enumerated in the second paragraph of this letter may need to be reminded that the facts of biochemical individuality are hard facts and are not modified in the slightest by anyone's desire to ignore them. Even the admission that it might be more convenient if they were not so does not alter the facts, which are being considered by more and more nutritional scientists. In the **Heinz Handbook of Nutrition** (McGraw-Hill, 1959) the existence of unknown ranges is indicated (pages 135 ff.) and chapter III of Norman Desrosier's **Attack on Starvation** (Avi Publishing Company, 1961) is devoted to individuality in nutrition. See also articles by Dr. Wendell Griffith and others in the **Proceedings of the Nutrition Conference,** Blacksburg, November, 1961.

The entire subject of ranges in nutritional needs—with respect to **all** items—needs extensive and intensive investigation. The Commissioner of Foods and Drugs is therefore urged most earnestly to postpone the enforcement of restrictions which will thwart further research and prevent the application and development of the insurance principle to nutrition and health. It is possible, of course, that I have misunderstood the intent of the proposals, but if they mean what they seem to mean, their adoption would be most unfortunate.

This whole area is of keenest interest to me. I would like to submit copies of my entire new book, **Nutrition in a Nutshell,** in support of my position, but copies will not be available until late in August.

Respectfully submitted,
Roger J. Williams
Professor of Chemistry
Director, Clayton Foundation
Biochemical Institute

Footnote: I do not regard isolated medical reports based upon suspicion and surmise as **evidence.** If we were as uncritical in the area of cancer as some are in accepting the idea that vitamin A is toxic at the 50,000-unit level, we would have already accepted, successively, dozens of "causes" and "cures" of malignancy. RJW.

Your Legislators Are Interested in Hearing From You

August 8, 1962

Miss Beryl McCullar
Hearing Clerk
Department of Health, Education,
and Welfare
Washington, D.C.

Dear Miss McCullar:

Enclosed please find several cards I have received from constituents. You will note that each of these raises objections to the proposed revision of Section 125 of the Food and Drug Act as the same relates to food supplements.

It is my belief that a hearing should be held prior to the adoption of these proposed changes in the Act. Further, I am opposed to any arbitrary, unreasonable, or adverse effect which the proposed changes might have upon the legitimate sale of health foods and food supplements.

Sincerely yours,
Wright Patman

Editor's Note: Wright Patman is one of the most powerful members of Congress.

There Is More Than Meets the Eye Don't Be Misled By Food and Drug Fact Sheets

Charles O. Pratt, N.H.F. Washington General Counsel
Suite 712, Barr Building,
910 Seventeenth Street, N.W.,
Washington 6, D.C.

In response to thousands of letters, cards, petitions and personal requests received by U.S. Senators and Members of Congress expressing serious concern about, and opposition to, the proposed revision of the food supplement regulations, many Senators and Congressmen contacted the top-level officials of the Federal Food and Drug Administration, and, after expressing their concern about the alleged disastrous effect of the proposed changes, requested an official explanation as a basis for their replies to inquiries of their constituents.

The Food and Drug Administration replied to the Senators and Congressmen with letters, copies of press releases, copies of memoranda addressed to the Secretary of the U.S. Department of Health, Education, and Welfare, and copies of "Fact Sheet on Proposed Revisions of the Regulations Dealing with Labeling for Special Dietary Uses."

Because of the foregoing "explanations" from the Federal Food and Drug Administration, many of the Senators and Congressmen apparently have been convinced that the proposed changes are necessary and reasonable, and they have innocently passed this idea along to their constituents, together with the propaganda put out by the Food and Drug Administration. Obviously, those who proposed the changes would support the changes.

In some of the printed propaganda, the Food and Drug officials have attempted to defame and libel several leaders of the thousands of citizens who sincerely oppose the proposed unfair, unreasonable and unconstitutional restrictions in the sale and use of dietary food supplements which are not dangerous to health, are not adulterated, are not deleterious, and are not, in any way, harmful like the nicotine and tars in cigarettes, the chemicals in soft drinks, the effect of alcoholic beverages on millions of our people, or the devitalized and over-processed foods on the market today.

These FDA officials have attempted to defend their proposed revisions of the food supplement regulations by throwing up a smoke-screen of belittlement of those who are willing to lead a worthwhile and effective crusade for the freedom of choice in health foods and health matters so long as that choice does not infringe upon the personal rights and personal property of others.

It is true that the said leaders fighting for freedom in health matters and opposing the proposed changes in the food supplement regulations have been tried and convicted of violations of the food and drug laws. It is significant that their convictions involved only the food and drug laws. The leaders were courageous in their beliefs in freedom in health matters. They believed, and said publicly that they believed, that the American people are overfed and undernourished.

In the FDA press release of June 20, 1962, a major overhaul of the nation's special dietary food regulations was called for. The release said:

"The regulations would cover vitamin, mineral and other dietary supplements,

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baby foods, foods for the elderly, low sodium foods, low calorie and artificially sweetened foods, protein supplements, hypoallergenic foods, foods for use in dietary management of disease, and all other foods represented as having special dietary properties."

When U.S. Senators asked the FDA officials to explain the scope of the proposed revisions as described above, the officials sent the Senators and Congressmen a copy of a press release dated August 17, 1962, which included the following statement:

"FDA said it is not true that a prescription would be needed to buy health foods or that 'health food' stores would be put out of business; that consumers would be unable to buy natural foods or vitamins from natural sources, or that sellers would be unable to make truthful statements about inherent dietary properties, such as the vitamin C content of orange juice."

From the foregoing statement of the scope of the proposed revision of the food supplement regulations, and in the light of the quotation of FDA denying the restrictions of the proposals, it is obvious that the Congressmen and the public could be misled by the talk about the vitamins in orange juice or apples, all of which is beside the point.

In the August 17 press release, the ". . . FDA said the proposed changes would prevent consumers from being misled by a listing of ingredients which have no value as food supplements. Such 'shotgun' formulas now contain as many as 50 or 75 ingredients, only a few of which are recognized as essential in human nutrition. Such a listing may mislead the purchaser into selecting the product simply on the basis of a large number of listed ingredients of which many or most are of no value."

In response to the foregoing statement, which is itself misleading, one would ask the question, "Since when did it become a governmental function under the food and drug laws or the United States Constitution to tell the American people that they cannot eat any particular number of nutritional ingredients, except by medical prescription, or that they can eat only eight vitamins or four minerals selected by the officials?"

In this connection, your attention is called to the fact that President John F. Kennedy, in his consumer's protection message to Congress on March 15, 1962, proclaimed four rights of the citizens of this country as consumers. These rights proclaimed are:

1. The right to safety.
2. The right to be informed.
3. The right to choose.
4. The right to be heard.

If the proposed changes are adopted, aside from the six vitamins, the four minerals and two other vitamins, B-12 and B-6, no other nutrient would be recognized by the regulations. No manufacturer would be able to imply value to any others—a severe restriction aimed at tablets, capsules and powders now being sold that contain many nutrients.

The FDA August 17 press release further stated that "The proposed regulations are also directed at false or misleading labeling which may lead consumers to believe that the average American diet results in ill health and that nutritional supplements are required to prevent or cure this."

Thousands of members of the National Health Federation do, in fact, believe that the average American diet is deficient in some of the vitamins and minerals essential in human nutrition and that some diets do not contain enough of the nutrients to maintain good health; and that, therefore, it is helpful to the average consumer who might not eat a balanced diet to balance his diet with dietary food supplements

(Continued next page)

essential in human nutrition for the purpose only of providing the vitamins and minerals for which the product is eaten and to prevent or overcome a dietary deficiency.

N.H.F. believes that to use dietary food supplements to fortify and supplement the usual or ordinary diet makes sense; and N.H.F. believes that to establish and adopt food supplement regulations which would require the average person to obtain dietary food supplements from drug stores based upon medical prescriptions would be unnecessarily expensive and, in fact, prohibitive, in cost.

The said August 17 press release further stated:

"FDA said it is **not** true that a prescription would be needed to buy health foods or that 'health food' stores would be put out of business." However, the N.H.F. believes that the proposed regulations which restrict the nutrients in food supplements to only eight vitamins and four minerals would have the intended effect to require a medical prescription to obtain legally any food supplement with additional or other nutrients. The proposed restrictions, in fact, will not permit dietary food supplementation even with some nutrients recognized by the FDA as essential in human nutrition, unless a medical prescription is first obtained and presented to a drugstore.

In brief, it appears to your Washington Counsel that the communications sent by the FDA to our Senators and Congressmen do not clearly and adequately inform them concerning the full and realistic effect of the proposed revisions of the food supplement regulations if adopted.

In view of the foregoing, it is still necessary that every member of N.H.F. write a personal letter to his U.S. Senators and Congressmen and **request them to take the necessary steps to urge the Commissioner of Food and Drugs not to adopt the proposed revisions on the ground that such revisions are unnecessary, unreasonable and unconstitutional, and for the further reason that the provisions need further scientific study by experts in the health, nutritional and medical field; and for the most essential reason that this whole subject should be aired at a full and public hearing before any changes are adopted and take on the effect of law.**

The National Health Federation brief setting forth the views and comments in opposition to the adoption of the proposed changes in the nation's special dietary food regulations was prepared by Charles O. Pratt, your Washington Counsel, and filed with the Hearing Clerk of the U.S. Department of Health, Education, and Welfare.

For the complete and detailed reasons for opposing the proposed revisions in the food supplement regulations, it is suggested that you read, and give others the chance to read, the brief, which appears in the October issue of the **N.H.F. Bulletin.**

Charles O. Pratt,
Washington Counsel
National Health Federation.

U.S. Seizes 97 Tons Of Contaminated Spuds

More than 97 tons of potatoes with excessive pesticide chemicals have been seized by the Food and Drug Administration, it was learned Monday.

The seizures included 42 tons in Oakland last week, packed by two Idaho firms.

Potatoes grown in Oregon and Washington also were seized and asked to be destroyed by the FDA.

The situation is not considered "cata-

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donic acid as well since the latter acid can be formed by the body from the linoleic precursor. Linoleic acid is converted to a saturated fatty acid in hydrogenation of vegetable oils and in the "hardening" of these oils which is another term for the same unwarranted practice of food emasculation. Atheroma of the skin, coronary atherosclerosis and arterial atherosclerosis are of common and tragic occurrence in the U.S.A. where excesses of saturated fats and hydrogenated fats are consumed with too small a proportion of unsaturated fats and oils. Clinicians have been able to normalize by restriction of saturated fats and by substitution of saturated fats with unsaturated fats. Clinicians are removing atheromatous placques from the faces of people with the use of unsaturated vegetable oils. Experimentalists are feeding saturated fats into tissue cultures of blood vessels and inducing atheroma, and then removing these atheroma by feeding into the culture media unsaturated fats in place of the saturated fats. Indeed, detailed procedures have been published for inducing atheroma in experimental animals and removing these by a switch in fats. Thus the dietary requires supplements of linoleic acid to offset the nutritional compromise induced by commercial food impoverishment.

7. Recent clinical evidence is to the effect that dietary copper deficiency is implicated in certain skin affections. So copper has a place in food supplements on this basis along with its role in blood formation and other metabolic processes.

8. Since minerals are largely milled out of grains; since minerals are extensively lost in the bleeding of animals; since minerals are excessively lost in vegetable cooking with a loss of the waters both in the restaurant and in the home; since minerals are for the most part removed in the refined white sugar; since some minerals, especially calcium, are in an important measure lost or made nutritionally unavailable in pasteurized milk, in roller dried milk, in dried milk—the losses in copper, magnesium, manganese, zinc, and potassium constitute a well-known fact contributing to the national malnutrition and justifying the addition of such items in food supplements. The additions may be viewed as being imperative in the public interest.

9. With reference to folic acid and pantothenic acid, it should be stated that, since these are also water soluble, they follow minerals in their losses, and since they are also largely destroyed in the degermination of wheat and corn, they have a place in food supplements to restore in a measure those nutrients at the same level as nature would provide them had man not impoverished this food with his illegal, senseless, thoughtless, and irresponsible procedures of food impoverishment.

10. The very fact that it is not known precisely how much of this list of essential nutrients is required in the dietary should give one pause when he says that there is no convincing evidence about a shortage in these nutrients listed. One would have to know just how much is required before making such a judgment, lest he be accused of **ex cathedra** pontifications.

11. When this paragraph 125.10 (c) refers to the "ordinary diet," it does so in disregard of the fact that no such thing as an "ordinary" or an average diet exists as such in reality, no more than can an "average" man be found. The food habits and consumption in America are as varied in kind as the number of individuals doing the consuming. We are reminded of the Roman observation, "quot homines, tot sententiae"—as many as there are men, there are opinions. And so there are as many dietaries as there are individuals with reference to

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quality and quantity in intake. The phrase "ordinary diet" is essentially meaningless.

12. Paragraph 125.1 (1), (2), and (3) are both implicit and explicit acknowledgments of the need for nutrient supplementation in the face of the dietary inadequacies of the American food supply. These paragraphs relate to **food** SUPPLEMENTS for physical, physiological and pathological conditions, for conditions of diseases, convalescence, pregnancy, lactation, food allergy, weight problems, infancy, youth, adulthood, and old age. This is a striking commentary on the inadequacy of the impoverished, devitalized and chemicalized American food supply and the imperative need for supplementation also with those nutrients without an established MDR in order to ensure against nutritional deficiency and its untoward consequences. There exists a contradiction in this proposal.

13. To eliminate from food supplements the items listed in paragraph 125.10(c) is to deny, by the police power of the State, the basic right of American citizens to disagree, and their right to purchase on the market that which they want in this area of food supplements and at competitive prices. We are supposed to have a government of, by and for the people. We have the constitutional right to purchase, in supplements, items from vitamin E to potassium as given in the list, whether or not there exists in the minds of selected "experts" a deficiency in the American dietary with respect to these ingredients. Americans have the constitutional right to do their own thinking and to be free of thought-domination by government and its agents which may be largely committed to one limited school of thought or to limitations in thought. All this is the more evident when people are **NOT** denied the right to purchase cola drinks which are far from wholesome, and when they are also free to purchase, in unlimited quantities, powerful drugs like tobacco and alcohol which minister prominently to the damages ensuing from enervating habits. There should be no inconsistencies in attempted paternalism.

14. A very telling weakness in the proposal of Paragraph 125.10 (c) lies with the fact that the proposal is based on the opinions of so-called "experts," or on what has often been designated as the "consensus of expert medical opinion." It would be better to seek dependence on the consensus of expert scientific opinion, which would emphasize the established facts of science, as opposed to the arts of medicine and any prejudicial interests or monopolistic desires which may thereto attach. It is well known that the "experts" in medical opinion sharply disagree and that there does not in fact exist any important or large consensus. It is also well known that the experts in science may also and often do disagree. In the meantime, paragraph 125.10 (c) should be eliminated or revised so that the people may exercise free choice. The proposal must include provisions for the nutrients listed so that they may appear in food supplements. It is common knowledge that the "consensus of expert medical opinion" partakes of the nature of pure fiction, unadulterated by any semblance of reality. This consensus is widely regarded as a mechanism or "deus ex machina" whereby arbitrary decisions may be made—decisions that are repressive of the general rights of citizens in favor of special views, vested interests, and monopolistic prejudices. The very fact that the consensus of opinion is constantly changing proves that this opinion is only opinion and as such is worthless. The burden of the proof rests with the affirmative, and opinion proves nothing. This Federal Register itself states, "Since

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1941 there have been many ADVANCES in the science of nutrition. . . ."

It took a long time for the inexpert "experts" to admit that vitamin B-12 and folic acid were essential in human nutrition, even in the face of overwhelming scientific and clinical information. During this time, caution had to be used in the sale of these as supplements, lest one be in danger of the judgment. More recently, and at long last, the "experts" had to admit that vitamin E was essential in the metabolic processes of the human body, although this was well known for many years; but in the meantime no claims could be made and people were in effect denied the benefits even more effectively than they are at present. And currently these "experts" are loath to admit of any particular claims for unsaturated fatty acids. The "experts" are slow to catch up with the facts of the scientific literature and the experiences of the clinic. In the meantime they sit on the lid and retard progress. This situation partakes in large measure of the backwardness of dominant opinion in the Dark Ages. I, too, am an expert and I disagree with these "experts." I am an expert by right of extensive formal scientific and related training, by right of long and intensive study of the current scientific and clinical literature, by right of intellect and logic, by right of objective and honest evaluation, and by right of ethical and human concern for the best public interest.

The fact that the "experts" deceive only themselves and few others is again exemplified in the unfair and inconsistent decision made with reference to whole fish flour, defatted, dehydrated and deodorized. I attach the letters to the editor of **Life,** which speak for themselves. The public knows better; read "A Miracle of the Fishes."

15. It is clear that paragraph 125.10 (c) is NOT in the public interest and should be revised.

16. Paragraph 125.10 (c) should be rewritten in the following vein as being in the best public interest in that it also takes cognizance of ingredients disregarded as of possible and probable importance and which should be included in the list, otherwise their inclusion in a label and product would be illegal because misleading.

"The essentiality of vitamin E, vitamin K, folic acid, pantothenic acid, linoleic acid, copper, magnesium, manganese, zinc, sodium, and potassium is recognized. When any of the nutrients listed are included in a supplement, a statement on the label shall indicate that no MDR has as yet been established with certainty for the nutrients in question with relation to human nutrition. In addition, a significant percentage of the recommended daily amounts of these items should be included in the daily ration before any listing should be allowed, the significant percentage being based on the recommendations of the National Research Council, National Academy of Science. Where no such recommendations for significant amounts exist, such significant amounts should be declared. The FDA should declare what percentage of the recommendation would be nutritionally significant as a guide against misleading labels.

"And when any of the following or similar ingredients are listed, such as Choline, Inositol, Bioflavonoids, Hesperidin, Rutin, Paraminobenzoic acid, Pangamic acid (B-15) and a number of OTHERS, the label shall state that the need for these in human nutrition has not been established with certainty. The FDA should establish an amount as significant if it thinks the mere inclusion in various small amounts is misleading."

II. Paragraph 125.7 (b).

It is not correct to state that plant fiber is "nonnutritive." This omits and evades important truths. There should

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Consumer Protection–What?

Secretary Abraham Ribicoff today announced the formation of the Departmental Committee for Consumer Protection in the Department of Health, Education, and Welfare.

The purpose of this committee is to carry forward continuously the four rights of the citizens of this country as consumers which were proclaimed by President John F. Kennedy in his consumers' protection message to Congress of March 15, 1962.

These rights are:
The right to safety.
The right to be informed.
The right to choose.
The right to be heard.

In the Office of the Secretary, Mr. Ribicoff simultaneously set up a new position, that of Special Assistant to the Secretary for Consumer Protection. He announced the appointment to that post of Mary E. Cunningham, who has been serving as chief of the Branch of Consumer Education of the Food and Drug Administration.

"It is a matter of the greatest importance that the Department of Health, Education, and Welfare, which touches so closely the lives of the people, conduct its programs with the best interests of the consumer ever in mind," said Secretary Ribicoff.

"Setting up an organization in the Department for this purpose is, of course, no substitute for the amendments to strengthen the Food, Drug, and Cosmetic Act for which I recently testified on Capitol Hill. Those provisions would require, among other things, that new drugs be effective as well as safe and that there be more effective inspection of the manufacturing and marketing of foods, drugs, and cosmetics. They should become the law of the land as soon as possible."

The new committee consists of representatives of each of the HEW agencies, including the Office of the Secretary.

Many of the educational materials which it will furnish consumers on request will come from the Food and Drug Administration, set up many years ago as an enforcement agency to protect the consumer.

Secretary Ribicoff pointed out, however, that other agencies in the Department have special consumer-protection interests.

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be a phrase, "nonnutritive bulk," because although fiber provides little or no absorbable nutrients, yet fiber of itself is important in human nutrition in a general way in that this fiber provides the bulk so important in facilitating food movements in the intestine, in stimulating peristaltic movements, in elimination, and in preventing constipation. The very fact that methyl cellulose has been given legal status as a food additive is a tacit admission of the important role of bulk in providing digestive tract stimulation and in providing a sense of "fullness." Thus, while the fiber does not exactly nourish, its bulk has admittedly important functions in the general physiology of nourishment and digestive physiology. This paragraph as it stands does not reflect fact, and to be in the best public interest should be revised as indicated to present the factual picture and in order not to obscure important issues.

Very truly yours,
Howard H. Hillemann, Ph.D.

"Few would think of the Office of Education as a protector of consumers," he said. "Yet in its investigations of degree mills and fake schools it does precisely that. The correct information it gives in the selection of colleges keeps parents from wasting money on schools not adapted to the talents of their children. And a tremendous amount of the information on good values comes from our schools and colleges."

Mr. Ribicoff pointed out that the Public Health Service carries on milk, food, and shellfish sanitation programs to protect consumers.

He called attention to the need for recipients of modest public assistance checks to obtain good value for these funds. The public assistance programs are administered by the Social Security Administration.

Secretary Ribicoff said that the new committee will:

Review the programs of the Department to see if they all take into account the best interests of the consumer.

Suggest strengthening existing programs and needed legislation.

Channel information to consumers and consumer organizations.

Miss Cunningham will serve as adviser to the Secretary on these matters. She was graduated in political science, history, and economics from Cornell University. She received her master of arts degree from the State University of New York at Albany. This was followed by service with the New York State Historical Society at Cooperstown, and New York State Department of Commerce, and with educational work in text and trade books at the Follett Publishing Company, Chicago.

N.H.F. General Counsel Comments on Foregoing

There recently was established in the U.S. Department of Health, Education, and Welfare, pursuant to the President's message to Congress last March, a Consumer Education Branch to carry out the work of the Departmental Committee for Consumer Protection. This committee was set up to promote the four rights of consumers, stated by the President to be the right to safety, to be informed, to choose, and to be heard.

There was established a dual position of Chief, Consumer Education Branch, and Special Assistant to Secretary for Consumer Protection, U.S. Department of Health, Education, and Welfare. The work of the one person holding the dual assignment will be to channel information to consumers and consumer organizations, to evaluate consumer programs, and to propose ways of strengthening existing programs and needed legislation.

The Consumer Education Branch will work closely with the Consumers' Council established by the President.

Many members of N.H.F. will recall that our President, Fred J. Hart, has advocated, for a number of years, the establishment of an independent Department for Consumers.

It is difficult to believe that any person, appointed to serve in the dual capacity as Chief of the Consumer Education Branch under the supervision of the HEW Public Relations Office and as Special Assistant under the supervision of the Secretary of HEW, could or would be in a free and independent position to criticize the Food and Drug Administration policies or the HEW policies, or to promote legislation inimical to the policies of either.

Your Washington Counsel will report in the **N.H.F. Bulletin** any future developments of significance relating to the Consumer Council.

Editor's Note: In the foregoing the N.H.F. General Counsel mentions our position regarding a consumer department. To clarify that reference we make the following comment. It is our firm

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belief that the matter of pure food and drink should never have been tied into the matter of drugs. In the beginning, the law dealt only with pure food and drink. That was as it should be, and enforcement was in the hands of the Department of Agriculture, which then was an appropriate place for it.

In 1938, those who would enslave the American people for purely economic reasons had the law rewritten to the end that food and drink would be scrambled together with drugs in one department. The word PURE was dropped from the law, so the title reads "Food and Drug Act," with enforcement being moved from the Department of Agriculture and placed with the Drug Administration of the Department of Health, Education, and Welfare, then known as the Social Security Department.

While in the Department of Agriculture the Pure Food Law was poorly enforced, due to the fact that early in the 1930's the chemical industry was invading the food and agricultural processing and growing field. The result of this invasion was that less and less attention was given to the purity of the American food and drink supply. This was an intolerable situation, because of the conflict of interest. The remedy adopted by Congress increased the conflict of interest and made the situation much worse. Since 1945, the chemical interests have more and more dominated the growing and processing of the American food supply until today we find hundreds of chemicals being added to our food and drink, both in the processing and growing of these products.

The excuse of the Food and Drug Administration for not preventing this adulteration of the food supply was, "We do not have the authority to stop this evil." Taking the department at its word, the National Health Federation, working in co-operation with Congressman James J. Delaney and Congresswoman Leonor K. Sullivan, was successful in securing the passage of what is known as the Food Additive Act of 1958. This act gave the Food and Drug Administration full power to prevent the adding to the food and drink supply of any chemical, unless and until it was proved harmless. I am sorry to say that the Food and Drug Administration has failed to live up to its duty in this regard. They have many excuses—some of which we think are valid. But, by and large, most of the excuses are nothing but cover-ups for failure to enforce this good law and thus protect the health of the American people.

We believe the source of this failure to protect the American people is conflict of interest.

Our proposal, as mentioned in the N.H.F. General Counsel's comments on the Department of Health, Education, and Welfare's publicity on the subject of "consumer protection," is as follows:

"We feel that the time has come for a separate department of government to be set up, entirely divorced from both the drug and agricultural administrations, because of their natural conflict of interest. The department should be operated solely for the protection of the people and should not be under the control of any branch of the government, except for the executive branch. In other words, it should be a cabinet position. It should never become an advocate, but always a protector. The word **Pure** should be put back into the law and the enforcement thereof should be transferred to this new consumer protection department. This Congressional Act, setting up such a division of government should specify that those connected with said department shall and must have no conflict of interest."

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That, in a nutshell, is our thinking on the subject. We, in this manner, submit it to our membership for their consideration and comment. The National Health Federation belongs to the people and its program must always reflect their will. We, therefore, will appreciate your comments. We are sure that there are many who will say that this department will soon become corrupt. To those we say two things: one, in this world we must have government, even though it is not always administered in the best interests of all the people; and two, now that the people are organized into a strong National Health Federation, they will have an opportunity, with a new division of government, to work with Congress and the officers of the new department to the end that a straight course may be charted and followed. By working together, the members of the Federation have economic and political power sufficient to offset any evil pressure that may be directed at officers and employees of such a department. Please let us have your thinking on this suggestion. This is your organization; support it with your prayers, giving and comments.

The following pages are being devoted to the subject of what is happening to our soil and our food and drink under the present Food and Drug Administration.

Washington — Following instructions from Health, Education, and Welfare Secretary Anthony J. Celebrezze, the Food and Drug Administration will no longer use concealed tape recorders during factory inspections, Deputy Food and Drug Commissioner John F. Harvey said.

Back Issues Available

So popular has the **National Health Federation Bulletin** become that we have had to adopt the policy of keeping a large supply of back issues available to fill orders.

The January issue, which was devoted to exposing what is going on in the public schools of America, has been so popular that we have already distributed 35,000 copies and just this week have given the printer an order for 10,000 more. This issue should be placed in the hands of every minister of every church and in the hands of the leaders of all American Legion Posts and other patriotic organizations. Our members alone can do this job. The Ashbrook Bill will be reintroduced into the next Congress. Now, while Congress is not in session, is the time to circulate this January issue.

The November-December issue of last year has also been very popular. To date, over 33,000 copies of this issue have been distributed by Federation members. An order will be placed next week for 5,000 more of this issue. The contents of this particular issue include many pages of facts which refute the misstatements of the A.M.A., Frederick Stare and many others who are interested in the continuance of adding chemicals to our food supply, etc. It is important that copies of this issue also be placed in the hands of the same parties whom we have suggested in connection with the January school issue.

The June issue, which was devoted to the matter of fluoridation, is one of the best compact treatments of the subject to be had anywhere. The original press run was soon exhausted, but we have now received an additional supply of

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People Should Be Treated as Humans— Even When They're Guinea Pigs

By CLINTON MILLER

The National Health Federation received national publicity in hundreds of newspapers on August 23, and again on September 20, when United Press International reported my charge before the Commerce Committee that Americans were being used as involuntary human guinea pigs without their knowledge or consent. This prompted the lead editorial on Human Guinea Pigs (which follows as Section I) in the Scripps-Howard newspapers on September 28.

This was preceded by an article (which follows as Section II) by syndicated writer Peter Edson.

Section I
HUMAN GUINEA PIGS

Editorial—Washington **Daily News**
September 28, 1962

Out of the thalidomide tragedy has come the startling revelation that people on whom drugs are being tested don't have to be told they're being used as human guinea pigs.

This is incomprehensible—and indefensible.

Certainly the patient, or a responsible relative, should know he's getting an experimental drug. And should have the right to refuse consent. After all, the patient's own health and welfare are at stake.

The Food and Drug Administration (FDA) insists it doesn't have authority to make physicians obtain patient consent—or even to require that patients be informed when they are involved in such tests. The FDA says this would be interfering with the "doctor-patient relationship."

Such an attitude is a symptom of mental constipation. If the FDA can specify under what conditions doctors may test drugs, surely it can require that the patients participating in the tests be acquainted with the facts. If, however, the FDA really does lack such power, Congress should remedy this at once.

True, the development of new drugs may be hindered somewhat by such a requirement—as some physicians and pharmaceutical manufacturers contend. But it is doubtful that medical progress would be seriously retarded.

In recent years, hundreds of thousands of parents throughout the country have

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10,000 copies. Orders can now be filled as they arrive.

The July-August issue, which was devoted to giving the truth about the drugless profession, should be distributed in the same manner as the January issue. The press and radio have been so filled with untruths about these large branches of the healing profession that it is incumbent upon the Federation to bring the facts to the attention of the people and especially to the members of the drugless profession and through them to their patients. Our printer has just replenished our supply with an additional 5,000 copies. We urge our members who go to drugless doctors to take a copy of this issue with them on their next visit.

All issues of the **National Health Federation Bulletin** sell for the cost of printing plus overhead and postage. The cost, delivered, is as follows: single copy 25¢; 7 copies for $1.00; 35 copies for $5.00; 100 copies for $12.00.

consented to having their children test out experimental polio vaccines when the facts are laid on the table. Experimental measles vaccines now are being similarly tested. And there seems to be no dearth of volunteers willing to test promising drugs in the treatment of such serious ailments as cancer, heart disease and arthritis.

In any event, the individual has an inherent right to know when he's being used as a human guinea pig.

Section II
ADDING FUEL TO A FIRE
By Peter Edson

A new gimmick that could start another hassle to follow the thalidomide controversy has just been introduced in the House version of drug control legislation now under consideration.

It is an amendment introduced by Rep. Samuel N. Friedel (D., Md.), providing that government regulations must require doctors to inform "human beings or their representatives" and obtain their consent to give patients experimental drugs before they are approved by the Food and Drug Administration for general use.

Obtaining the consent of a patient's "representative" was included to cover the cases of children, the critically ill, those in a coma, or incompetents whose parents or guardians have the responsibility for their dependents,' relatives' or wards' care.

From an average citizen's point of view it is only common sense that patients be told when a new drug is prescribed for them and give their consent to its use.

This idea was presented to the House Commerce Committee on August 22 by Clinton R. Miller, assistant to the president of the National Health Federation of San Francisco and Washington.

Mr. Miller testified that "no person should be denied the right to know that he is being made an involuntary guinea pig for the testing of experimental drugs."

Rep. Friedel was present when this testimony was given and said he would introduce a drug bill amendment to this effect. It has just been approved by voice vote in a House Commerce Committee closed-door session marking up a final draft of the legislation before it goes to the House floor for debate.

The 78-to-0 Senate-passed drug bill contains no such stringent restrictions. Sen. Jacob K. Javits (R., N.Y.) offered a strong amendment with this provision during floor debate. But after cloakroom conferences he was persuaded to water it down.

So the Senate bill provides only that the Secretary of Health, Education, and Welfare, in issuing regulations on the use of experimental drugs, "shall have due regard for the ethics of the medical profession and the interest of the patients."

The medical ethics of this situation are laid down in an opinion of the American Medical Association House of Delegates, March 3, 1958. Three principles for the use of experimental drugs must be followed "wherever possible."

- There must be voluntary consent of the patient.
- The danger of each experiment must be explained.
- The drug must be prescribed under proper protection.

Pharmaceutical Manufacturers Association is issuing a statement calling attention to some of the problems of conducting research and developing new drugs under the proposed Friedel amendment.

The question raised here is how new drugs can be approved if there are no

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tests on human beings without their consent. Sound medical research can be conducted, it is maintained, only if patients have no knowledge that they are being given experimental drugs.

The only way around this psychosomatic bloc is to tell a group of guinea-pig patients: "We may or may not use this drug on you if you give us your consent." Some of the patients would then be given the drug. Others would be given sugar pills, as a control on the experiment by comparing the results.

—From Washington **Daily News**
September 20, 1962

Editor's Note: Emphasis added.

And this was followed by a featured article in the **Saturday Review** of October 8 by John Lear in which he identified the opposition which would oppose the amendment to require consent of an individual before he could be used as a guinea pig in a medical experiment.

Our amendment was introduced by Rep. Friedel of Maryland, and through the efforts and support of Rep. David King (Utah), Rep. John Moss (Calif.), and Rep. John Dingell (Mich.), we were able to get it passed by the House of Representatives. An attempt was made when the bill went to conference to destroy the Friedel consent amendment, but we were able with the support of these representatives to keep the amendment, but were not able to prevent the opposition from tacking on a phrase that may be used as a loophole. However, the fact that the bill as finally passed carries the Friedel amendment requiring consent before use as an experimental guinea pig has established the principle in Federal law. If we find that the escape clause is abused, we can amend it off in a future Congress.

The acceptance of the Friedel consent amendment and the Dingell amendment (to H.R. 11581 and S-1552) requiring side effects of drugs in brief form to be listed in all drug advertising made the Kefauver-Harris drug control bill a "green light" bill, and took it from the "red light" side of our workshop. While not perfect, it had more good than bad provisions as amended.

It represented the second successful amendment of federal legislation by N.H.F. in 1962. The first was the amendment of the Mass Vaccination Act to make vaccination voluntary as a national precedent. **We successfully amended the major health bills and defeated or bottled up the red light bills we didn't amend!**

(**Note:** As I mail this, I still do not know whether this mass vaccination bill will pass. Congress will probably not adjourn even Saturday. There is a possibility that this bill may not even pass, and if not, we should receive special notice here; but while the drug control bill has passed, the mass vaccination bill has still not passed the Senate, and just may be so unsuccessful with our amendment that they will let it die. In this event, we have prevented $30 million from being used at a federal level to promote mass vaccination. But I can't report it that way till Congress ends.

Annual Meeting Bazaar

At the last National Health Federation annual meeting we failed to hold our regular bazaar. This is to advise you that at the coming Annual Meeting and Convention we will again have a bazaar.

Please start now preparing something to send in for this affair. You may send your gift, whatever it may be, to the President of the Long Beach Chapter of the Federation, Dr. Robert Howell, 936 Pine Street, Long Beach, California. It will help, in preparing for this outstanding event, if you send your contribution at an early date.

To Correct a Misunderstanding

There has been a great deal of misunderstanding about the position of Dr. Royal Lee and Vitamin Products, Inc. In clarification of various matters arising under a consent decree entered in Milwaukee, negotiations have been going forward with FDA on a very constructive and co-operative basis. The problems primarily revolve around labeling, which has become a subject of tightening regulations. Every pharmaceutical company and everyone in the nutritional and food supplement business is increasingly aware of the mechanical problem of complying with these regulations, which are just as strictly applied to recognized and approved products as they are for any product deemed to be of a doubtful character.

At the present moment many of these problems have been cleared in principle by Dr. Lee's attorneys in Washington, D.C., with the General Counsel's office of the Food and Drug Administration, but the labels must nevertheless be processed through the Division of Advisory Opinion in FDA, which is where they are now lodged.

What differences of opinion may remain as to the therapeutic or nutritional value of a number of products presents the familiar problem common to the drug industry and the food supplement industry, and it is hoped that these, too, may be negotiated to a point of reaching a satisfactory conclusion. This information is based upon discussion with Dr. Lee's attorney in Washington, D.C.

N.B.: It has been erroneously stated that Dr. Lee could not speak at a recent Natural Food Associates convention because of Food and Drug Administration regulations or ruling. This is untrue, and in fairness to the FDA we want to set the matter right. Dr. Lee is confining his talks, with few exceptions, to professional groups. The Food and Drug Administration, by and large, is working for the protection of the public. When we think FDA officials are wrong, we tell them so, but we do not want to unjustly accuse them. We want, above all else, to work with them, and we want their co-operation for the good of the people. By this same token we hope that they will not feel that the Federation is an enemy when we oppose some of their actions which we do not think are in the best interests of the people or, for that matter, of good government.

FAMILY CIRCLE

(Continued from page 2)

any misunderstandings our members may have had regarding the contents of the **Herald of Health.**

New Address. When you read this item the Federation will be located at 211 West Colorado Boulevard in Monrovia, California, and all mail should be addressed to that location. Our post office box number will be 686. This is a very fine piece of property and has the additional room needed for Federation activities for the next three years. There is room on the lot for expansion when needed. The rent paid by the Federation will pay for the property in seven years. This is so because the Federation is able to take over a sales contract on which a considerable part of the principal has already been paid in by a corporation which is unable to continue the payments, as it has no current revenue, so the misfortune of this corporation is the good fortune of the National Health Federation.

N.H.F. WASHINGTON NEWS

ADDITIVES IN FOODS

In the first half of 1961 the Government established tolerances for toxic pesticide compounds on foods to the tune of 21. We list them as follows:

Delapon—on grapefruit, limes, oranges, and tangerines.

Diazinon—on alfalfa, corn forage, and sweet corn.

Dilldrin—on bananas, provided no residue remains in the pulp.

Di-Syston—on sugar beets, sugar beet tops, and potatoes.

Diuron—on citrus fruit.

Malathion—on peanuts.

Maneb—on bananas.

Parathion—on rice.

Phosdrin—on artichokes, celery, cherries, garden beets (with tops), raspberries, melons, carrots, eggplant, okra, peppers, summer squash, and shelled walnuts.

Sevin—on filberts, apricots, blueberries, cranberries, lettuce, nectarines, and okra.

Sodium-O-Phenylphenol—on nectarines and tomatoes.

Tedion—on raw figs, strawberries, melons, and tomatoes.

Thiodan—on apples, apricots, artichokes, eggplant, grapes, nectarines, peaches, pears, peppers, strawberries, and tomatoes. Zero tolerance for milk and meat (which indicates how very potent the chemical is).

Therom—on celery.

Toxaphene—on collards, kale, and spinach.

Tributyl Phosphorotrithioite—on cottonseed (for pressing into oil).

Orange Juice in Trouble

FDA has cracked down on the Snow Crop Division of Minute Maid over labels on concentrated orange juice. Statements on labels say, "Equal to juice of up to 12 oranges," and the term, "Snow Crop 100% richer in visible flavor cells." FDA seized 786 cases of juice, claiming that such statements make the product misbranded.

Preservatives in Cheese

FDA has been permitting the use of hydrogen peroxide, a bleach, and catalase, a preservative, for milk used in making cheddar cheese, Swiss cheese, colby cheese, and granular cheese. In spite of such leniency to the cheese industry, this government agency has incurred the wrath of several big, potent outfits. One is big cheese maker Kraft, and the Wisconsin Swiss and Limburger Cheese Association, as well as the State of Wisconsin. The newer standards for use of the chemicals had been urged by such other big cheese makers as Armour, Borden, Swift, and Canada Packers.

So FDA finds itself in the middle between some highly potent influencers. It seems that the first-mentioned group is trying to build a natural process acceptance—as in Swiss and Limburger. The others—mostly big manufacturers—want the chemical process to be specified as the standard.

The State of Wisconsin objected strenuously to FDA's presentation of its arguments in favor of the chemicals—which says hydrogen peroxide and catalase are generally listed as safe. State spokesmen believe the chemical process has never been proven on a commercial scale, has no history of consumer acceptance, and could ". . . jeopardize the entire Swiss cheese industry."

From Good Intentions

FDA got itself into another argument

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over some legal inconsistencies. It seems that one section of the food, drug and cosmetic law allows chemical sweeteners in foods for dietary uses, but attempts to deny their use in "weight reducer" confectionery.

Federal Judge Sweigert in Northern California rendered judgment in favor of a firm using saccharin and sodium cyclamate in its "low calorie" candies. FDA has taken strong exception to the judge's ruling with the claim it will "adversely affect the administration" of the food and drug laws, and refers to such products as "economic adulterants" used "deceptively . . . as cheap fillers."

And this, we believe, shows so clearly that lamentable inconsistency of the government agency which is presumed to oppose harmful substances in the nation's food supply.

Unhealthy Chickens

The antibiotic tylosin has been cleared by the FDA for use in the drinking water of chickens, ". . . as an aid in the prevention or treatment of chronic respiratory diseases . . . ." It had already been sanctioned for use in swine feed to promote growth and increase feed efficiency. Both petitions for use came out of a subsidiary of the huge Eli Lilly drug, pharmaceutical and chemical cartel.

The drug may not be administered for more than five days, and may not be given to laying hens. FDA also specified that chickens so treated may not be slaughtered for food within 24 hours of treatment.

So—the experts indicate that you may feel free to eat a sick chicken provided its medicine was stopped 24 hours before its unhappy demise.

World Health Organization Dictum

An expert committee of the Food and Agriculture Organization and World Health Organization has rendered a recent decision on certain food additives. It stated, "A number of natural and synthetic compounds used to preserve food can be dangerous in the long run when taken in large quantities." A further statement pointed out in that category, ". . . such ordinary substances as citric acid and ascorbic acid, that have the added properties of improving flavor and food value of fruit juices."

This dubious world health authority has also determined "the amount of certain of these compounds that can be consumed daily without harmful effect."

The expert committee on food additives was established following a 1955 joint W.H.O.-F.A.O. conference in Geneva. We assume that they intend to establish a world-wide pattern to protect consumers on the one hand—while encouraging the flood of food chemicals which is inundating the nourishment of every individual American.

How Industry Wins

Recent action of the Flavor Extract Manufacturers Association with regard to FDA's approval of a long list of products points up the core of the food additives problem.

FEMA, with its committee of six experts, has issued two lists covering 662 flavoring components which it claims are exempt from the Food Additive Law because they are "generally recognized as safe." FDA has approved the industry approach in the past—has accepted their standards. But in this instance the government agency felt that industry had gone too far.

As a result, FDA once again has a battle on its hands with big industry. The flavoring industry has lined up its scientific and legal "brains" in a battle array which will mean that FDA must trot out its battery of "experts" to attempt to settle just what Congress intended when it passed the Food Additive Law.

It is just this constant pressure applied

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by industry with its big resources of money and brains that keeps the basic problem of the consumer in jeopardy. All of the flavor components being argued over are synthetic, and most, if not all, should be put under a certain ban.

Power of Industry

The Food and Drug Administration has grown in leaps and bounds since 1952 when its entire annual budget was in the $5 million class. Its scope of operations has increased to the point where the 1962 budget as proposed for them by the Bureau of the Budget had leaped upward to $25.4 million.

During Senate Appropriations hearings on the Food and Drug Administration budget, that previously friendly, generous body abruptly slashed $1.58 million from the substantial 1962 budgetary increase. The report which accompanied the proceedings contained some harsh language regarding FDA, and calling some of its recent procedures questionable.

At the heart of this flare-up has been FDA's stepped-up regulations under the new Hazardous Substances Law. Sharp protests had come from the potent turpentine industry in the South over the classification of turpentine as "highly toxic"—a ruling which would also require that labels bear the word POISON plus skull and crossbones. The turpentine industry took their loud complaints to their Senators and Congressmen. Greatly strengthening their case is the fact that three southern senators sit on the Appropriations Committee, Hill (D-Ala.), Russell (D-Ga.), and Stennis (D-Miss.).

So—in such manner does industry strike back at those who would bar their path to unrestricted profits. Their action is liable to put a serious damper on FDA's plans to control pesticide residues in fresh produce. The proposed budget would have provided only enough funds to check up to 1% of the total market.

Tranquilizers for Animals

Your beef, your lamb, your pork chops will eventually come from contented, even-tempered animals. The mad scramble by the big pharmaceutical companies for ever more outlets for the wide-ranging variety of their experimental laboratories is beginning to blanket the field.

FDA has recently cleared the use of promozine hydrochloride as a tranquilizer in feed for cattle and horses. The clearance had been sought by Wyeth Laboratories which markets the tranquilizer under the name of Sparine for human use. **The order permitting such use specifies a zero tolerance for the drug in "uncooked edible tissue," and the label specifications require withdrawal from feed 72 hours before slaughter.**

We are still unable to picture a grower keeping a timetable on such procedure, and using the responsible approach of a scientific operator.

Spotlight on Consumer

The idea of consumer representation is being bandied about in Washington these days with proposals for a new Department of the Consumer in the cabinet and with other suggestions that a Consumer Counsel be appointed as a member of the President's White House staff.

There have been bills introduced in several recent congresses which proposed setting up such a cabinet-level government department. Several such bills are pending in the present 87th Congress.

Latest bill dealing with the subject was introduced by Senator Keating (R-N.Y.) which would provide for a Consumer Counsel in the White House. Such proposed legislation has all the earmarks of an attempt to nail down all consumer issues into the hands of a single brain, a czar.

FDA's Inadequate Testing

A medical witness before a Senate

(Continued next page)

Appropriations subcommittee recently pointed out the inadequacies of the Food and Drug Administration's testing capabilities. Basing an argument on the demands made by the fairly new Delaney Cancer Clause, the critic stated that it is impossible to accurately determine what is cancer-causing in experimental animals and what is not.

It was emphasized that FDA has very inadequate research funds to do a job of protecting the public in this important cancer category. Wanted is $10 million more to cover a program of research, $5 million of which would go to a program strictly within FDA, and the other $5 million for building and facilities.

Sharply criticized was the U.S. Public Health Service with its $200 million in research funds per year. Only $1.9 million of this went for studies on chemical carcinogens, and of this only 17 grants amounting to $291,200 were directed to the problem of cancer from food additives last year.

Evidence here shows how little the government's leading cancer agency is really trying to stop cancer—despite the fact that they are squandering hundreds of millions of dollars each year in supposed research.

Sweet Cheats

A revision of the special dietary food regulations is being contemplated, according to a Food and Drug Administration news release. One of the current concerns is the rapidly growing use of artificial sweeteners in a wide variety of food products. A spokesman has stated, "Recent developments pose real questions as to how we are going to surround the use of artificial sweeteners with the safeguards necessary to prevent deception and confusion of the calorie-conscious consumer."

Dietary foods are covered by Sec. 403(j) of the Food and Drug Law, which says a product is misbranded "if it purports to be or is represented for dietary uses, unless its label bears such information concerning its vitamin, mineral and other dietary properties as the Secretary determines to be, and by regulation prescribes as, necessary in order to fully inform purchasers as to its value for such uses."

Tardy Drug Controls

Deputy Commissioner of Food and Drug Harvey has released news that long-needed regulation of the pharmaceutical industry is in the offing. The Dr. Henry Welch episode from the 1960 Kefauver drug hearings brought out the sad state of drug regulations.

Prodded on by bills introduced in the present Congress, the regulatory agency has cited the following goals for control of disgraceful practices of the past: A requirement that efficacy as well as safety of "new drugs" be established; mandatory reporting of harmful drug reactions; certification of all antibiotics; controls over all barbiturates and amphetamines; and pre-market clearance of cosmetic ingredients.

We believe this to be only a partial step in the direction of really effective brakes on the "fast and loose" practices of the big, wayward drug cartels. Many of them are so bold as to continue to refuse Food and Drug Administration inspectors entrance to their plants.

Mighty A.M.A. Speaks

The American Medical Association will issue a statement on the use of chemicals in foods. The big, bossy medical monopoly has revealed this through its Council on Foods and Nutrition. Most Americans will be rather astounded to learn that A.M.A. has such a department.

However, there is every assurance **it will be used to sweep most useful, helpful facts on nutrition under the rug.** To bear out this suspicion, a spokesman has stated recently that the public is

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being "brainwashed" and "confused" by the many dietary suggestions being made in the lay press. He backed the government's weakly supported contention that therapeutic claims for unsaturated fat products are unwarranted, and dietary changes should not be recommended to the general public.

The customary duplicity of this big, bad bully of the health field is somewhat revealed in the spokesman's revelation that a "large-scale" study of the dietary fat and cardiovascular disease question is being planned. This could easily indicate that A.M.A. simply does not have scientific facts at their command on this serious, threatening health question.

Is there such a thing as a "safe tolerance"? See the following article.

The Concept of Safe Tolerance Dosage

J. Baldwin Bruce, B.S., M.D., F.A.C.S., A.M.A.S.

There are differences between animals and people, therefore it is extremely hazardous to fix "safe doses" for humans on the basis of animal laboratory experiments. Also to be considered are those people who are below normal, that is, metabolically defective and sick individuals who have varying susceptibilities. Must the health of people be endangered for the financial benefit of the manufacturers of chemicals? The concept of "safe doses" has many risks because of the variables that influence human biology.

It Is Still a Poison

Small amounts of cancer-causing agents not sufficient to affect the general health are sufficient to initiate cancerous growth. The nature of a poison is not changed by reducing the amount; regardless of the dose, it is still a poison and antagonistic to the human organism. Can you find anyone to disprove it? If a dosage is reduced, and so much so that the damage is not immediately discernible, it does not mean that damage no longer takes place, and that would apply particularly to a chemical that is cumulative. Though a scientist may advocate the use of poisons in small amounts, he has convinced only himself that this is safe procedure, when really his hypothesis is not a scientific fact. It is only a pseudo-scientist's rationalization. A true scientist does not try to pervert and deceive nature with biological tricks and chemical cunning. By means of propaganda, proponents are trying to get the people to accept the false idea that poisons taken in small quantities cease to be harmful simply because they are taken in small quantities. Is it necessary for one to die immediately and have an autopsy to prove the issue? What man takes into his body is what goes to make blood, brain, bone, and flesh. If poison is taken into the body continually, through cumulation would you expect a person to have a strong nervous system? That is why our hospitals are filling up with mental-health patients and those with other ailments. There is no justification to the use of a toxic substance, even in small quantities, because it places a

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cinogens. Because of the fact that these carcinogens may not develop until many years (20 to 30) after exposure, those who have eaten them (not knowing) are yet to be counted, and this is cause for worry. Therefore, you should realize that a carcinogen introduced into the nation's food supply today, even though later withdrawn, could induce cancer many years later in those individuals who consumed it in the beginning. The cancer specialists of the International Union Against Cancer have on more than one occasion passed a resolution against the concept of establishing tolerance doses for carcinogens. Why should the cunning schemers of our nation be allowed to pass laws to suit the industrialists at the cost of the lives of individuals? The concept of safe doses has been widely under attack because it is unwise to fix doses for humans on the basis of laboratory results. Threshold values vary with each individual, and the cumulative and irreversible nature of carcinogens must always be considered. It is impossible to measure a safe dose, and it is imbecilic to even think it can be done. If such procedure continues, how can we ever get cancer under control? Because of so many variables that influence human biology, the "safe dose" concept would involve many risks. There is the possibility that chemicals under the influence of heat, additives and contaminants may interact to form new compounds capable of having carcinogenic reactions. Many chemicals have been used for years before they were found to be carcinogenic, and that no doubt accounts for the statistical rise of the cancer graph and will continue so into the future because of belated development and recognition.

The Digestive Tract a Sewer for Economic Profits

A noted scientist has warned, "It is to our peril if the human digestive tract is legislated into the role of a sewer for disposal of chemicals that afford only commercial advantage."

We never pause to think that nature created and sustained life for thousands of years before science came to be known. Now we may question whether all the pollutants man has produced might not lead to his wiping out his own species, even the industrialists. These tolerance tests are an adopted theory of safety and are only illusory because they will be completely disproved by better knowledge and further tests. At the present time, the policing and controlling of these tolerance tests is not possible by the FDA; therefore the people are without guaranty. The Federal Trade Commission has failed to discharge its statutory responsibilities to protect the public from the evils of false and misleading advertising. The U.S. Government seems to be unable to defend the citizens against the techniques of advertising.

Conflict of Interest Is Bad

The previous administration diminished the effectiveness of federal control by the appointment of a man as chairman of the Federal Trade Commission who, prior to his appointment, had been a Washington lobbyist and represented a number of business clients charged by the F.T.C. with deceptive practices.

If a claim is false on a label it is false in every method of advertising and should be stopped by the government.

Mankind's Health Being Destroyed

A noted biologist states that man can destroy himself through indiscriminate use of chemical pesticides; that there is a possible link between insecticides and an increase in cancerous disease with fears that genetics may be affected; that birds have been silenced by reckless use of chemical compounds and fish

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have ceased to inhabit some waters; that the incidence of leukemia has been steadily rising; that figures available from the United States Office of Vital Statistics clearly establish an alarming rise in malignant disease of the blood-forming tissues; that at the Mayo Clinic, patients with diseases of the blood-forming organs "almost without exception have had a history of exposure to various sprays which contain DDT, Chlordane, Benzene, Lindane, and petroleum distillates." Why is it that some countries have curtailed the use of such preparations, but the United States imposes no restrictions?

Dyes Used Can Make You Die

My readers should be alerted as to the use of dyes. The consumption of ready-prepared, canned, bottled, and packaged foodstuffs has so increased that it has brought about the use of synthetic dyes, most of which are the coal-tar products, and we are consuming over a million and a half annually. In 1938, nineteen dyes were certified by the Federal Drug and Cosmetic Act. In 1957, the FDA reported that ten of these dyes had produced cancer in rats and that these oil-soluble colors were so poisonous when injected under the skin of mice that the animals died before the scientists had a chance to discover if cancer did develop. It was only by reducing the dose that the inclination to cancer could be produced. Though the International Union Against Cancer has ruled that not one of the 29 dyes has proved safe, yet the government has only removed two. Here is a list of some of the certified dyes: orange 1, orange 2, yellow 1, yellow 2, yellow 3, yellow 4, yellow AB, yellow OB, green 1, green 2, green 3, blue 1; these dyes are used in fish pastes, carbonated tonics, jellies, candies, custards, biscuits, cakes, ice cream, cordials, syrups, sausage casings, puddings, frozen desserts, cheese, margarine, edible fats, coloring oranges, macaroni, spaghetti, essences, maraschino cherries, extracts, crystals, bakery goods. The yellow AB and the yellow OB are made from chemical beta-napthylamine which has a high cancer hazard. Even with precaution, cancer of the bladder is prevalent among workers in the factory where it is produced. The International Union Against Cancer claims that a chemical carcinogen can cause cancer in any organism, no matter how administered. In 1955, 200 children were made ill from eating dyed popcorn at a Christmas party. Why are these dyes still allowed to be produced and consumed, and why are the laws so stressed as to protect the manufacturer from financial loss by allowing previous stocks to be used up, leaving the public to take the risk? To explain to you what I mean: the date of a hearing was December, 1953, but the ban did not go on until February, 1956.

Let me explain briefly the experimental data: rats fed at a level of 2.0 per cent of the dye diet all died within a week; another group fed at a 1.0 per cent level all died within 12 days; at a 0.5, half of one per cent, level most of the rats died within 26 days; the next group, 0.25, that is at a quarter of one per cent level, half the rats died within three months. Similar results were obtained in dog experiments. Autopsies revealed liver damage and enlarged hearts. Detergents also may act as cancer promoters.

Meat Eating Becoming Dangerous

In regard to our meat diet: some of our beef may contain synthetic hormones, insecticides and other chemicals. Cold meat and other meat products are subject to preservatives, curing solutions, antioxidants, flavoring agents, and chemicals for tenderizing. Stilbesterol is an acknowledged carcinogen by the International Union Against Cancer, yet it can be purchased freely by the farmers at feed-supply stores and used with-

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out the knowledge or concern of the harmfulness to the human body. It is used to fatten and increase the weight of cattle and poultry in preparation for sale to the market. It causes breast cancer, may arrest the growth of children, cause excessive menstruation, may induce fibroid tumor growth, cause impotence and sterility in men, affects the enzymes and the pituitary gland, and interferes with liver functions.

Distortion of Truth for Profit

We are experiencing falsifying and distortion of medical truth for commercial enterprise of profit. Brain-washing by high-pressure advertising on the TV and radio, and in magazine and newspaper advertising and other agencies is kept up day after day. Why the government does not stop such misrepresentation is open to discussion. All these methods of advertising have surpassed government control, and, many times, damage has been done before it has been detected; therefore, there should be reason to believe that there should be a consumer's representative in government, in the President's cabinet.

Unless the medical profession becomes more alerted, we may spend the next generation trying to unscramble the harm that has been done with chemicals.

Be Alert—Organize and Act

Now that you have been enlightened, don't you think that you should form groups and make personal contacts with your congressional representatives before we reach the stage where everyone will have cancer? What a "gene" or hereditary character to hand to the unborn child of the future on which to build our future generations. Even the manufacturers of carcinogens will eventually be out of business and will have to die sooner than need be.

This author hopes that you will heed this enlightenment.

What About the Phillips Case?

By Theodore J. Sutter

On September 4th of this year, a Superior Court jury delivered a verdict of guilty of second-degree MURDER against a chiropractor licensed to practice in the State of California. The significant factor in this decision is that at no time was it contended that the doctor did anything harmful to the deceased. The murder charge was based on the reasoning that the deceased would have survived a little longer had she remained under the orthodox medical care she was scheduled to receive and had the chiropractor refused to accept the case. It is this reasoning which makes this case the most dangerous precedent to threaten the freedom of choice of the sick public in many a year. The obvious implications of this decision are that only the strictest orthodox medical practitioner can take the risk of having a patient die whether under his care at the time of death or not. In fact, in this case, the patient was under Dr. Phillips' care for only 20 days and died 4½ months later under the care of a Christian Science practitioner.

The greatest advances in all fields have come from those able to break out of the strait jacket of orthodox thinking and do some original and creative thinking. Especially is this true in the healing arts. Today's heresy is tomorrow's accepted dogma. The Phillips decision goes a long way toward slipping the dead yoke of conformity on all the healing arts.

This case is now being appealed, but the need for funds is urgent. This verdict was an unjust decision; but bad decisions make bad law, as an old legal axiom states. Therefore this appeal must succeed. It's our one chance to stop this terrible precedent from being set.

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INFORMATION ABOUT THE CANDIDATES

L. P. DeWolf, past President of Florida Chapter, Natural Food Associates, and always an ardent booster of N.H.F.

Charlotte Holmes, M.D., President of American Medico-Physico Research Association, a progressive association of doctors.

Mrs. Frank Preston, who has been serving on the Board as the representative of the Pennsylvania National Health Federation. She has been so faithful that it is felt that she should be elected to the Board as a member at large.

Anna E. Lamb, owner and operator, with her husband, of a health food store in Wichita, Kansas. Always at our conventions working hard for the cause.

Stanley Stewart, of Colby, Washington, former President of the Washington State Health Federation.

Ray Overacker, attorney, active in the natural approach to health movement.

Evans A. Waterman, of Hemet, California, a leader in the health movement in Hemet.

Gordon Bartter, Columbia Station, Ohio, a dairyman and believer in organic farming and natural approaches to the health problem.

Jack S. Alkire, of Columbus, Ohio, former President of the Ohio Chapter of the Natural Food Associates. Owner of a health food store.

Eugene Dietrich, Toledo, Ohio. Owner and operator of a health food store, who believes in practicing what he preaches.

Roy Paxton, of Carlock, Illinois, a manufacturer of an herb tonic.

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2. **Mark Your Calendar.** Do more than that—send your reservation now for a room at the Breakers Hotel, 210 East Ocean Blvd., Long Beach, California. That is where the eighth Annual Meeting and Convention will be held January 2, 3, 4, and 5. The most important and greatest program the Federation has ever presented.

3. **First come, first served.** We have reserved 100 rooms at $6 single and $10 twin or double beds. We have also reserved 50 rooms, newly decorated, at the rate of $7.50 single, $11 double, and $12 for twin beds. All rooms have TV and AM/FM radio.

4. **Make your reservation now.** If you find later you cannot come, you may cancel without penalty. Please do not put it off; do it now.

5. **The Federation has come into its own,** and must make very important decisions at this meeting, decisions which will affect the future health of America.

6. **WE HAVE MOVED.** Please note that our new address is 211 West Colorado Blvd., Monrovia, California. (P.O. Box 686.)

7. **An FDA official says** that comments, mostly adverse, relative to dietary foods regulation revision, broke all records.