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## What's Sauce for the Goose. . .

IN GATHERING INFORMATION for its annual "Pesticides Round-up" (page 656), AG AND FOOD's field staff has received from several quarters reports that the Miller Pesticides Amendment is not being effectively enforced. The first such report, from a source close to the situation in the Midwest, held that frequently in that area pesticides are being used on forage crops too close to harvest. As a result, say the reports, residues in end products such as meats, milk, and butter often exceed the limits set by the Amendment. The residues still are not considered serious, but they are legally out of bounds.

On inquiring further, in other regions as well as in the Midwest, AG AND FOOD received additional expressions of opinion that either the government does not care, or the individuals responsible for local enforcement are reluctant to enforce fully and at once the Amendment's rigid requirements. There is some opinion, however, that a "crackdown" is in the offing—perhaps next year.

An inquiry to a high-ranking official at the Food and Drug Administration brought a firm denial that FDA is "looking the other way" while illegal shipments of over-tolerance produce move to market. The law is being enforced, says FDA, and no "crackdown" is pending because no laxity exists.

When two groups disagree in this way, both cannot be entirely right. In this instance, we doubt that either is entirely wrong. Reports of over-tolerance shipments are sufficiently widespread—and from credible sources—that it appears certain the Amendment is being circumvented in some instances. On the other hand, the FDA is more conservative than liberal in its interpretation of public health laws, and its official attitude certainly allows no inference that Miller Amendment enforcement is intended to be a half-way proposition. Because of limitations imposed by budgets and by shortages of personnel, it is perhaps inevitable that some improper practices will escape detection.

If there has been avoidable infraction of the Amendment's provisions, then regardless of how trivial may be the residue excesses, and whatever the reasons for their having gone unpunished in the past, such circumvention should be nipped in the bud. It is granted that enforcement may be difficult or "impractical" at this early stage when relatively few specific tolerances have been established, and that some local economic disruptions may result from strict enforcement. But the Amendment will be worse than useless if in its administration huge expenditures are required for the determination of safe tolerance levels, and those levels are then permitted, knowingly or not, to be ignored.

Both the Government and the pesticides industry, considered separately from the "general public" the Amendment seeks to protect, have an important stake in fair policing of the law. A sample of the kind of headache government agencies may have thrust upon them in dealing with chemical problems is provided by the recent fracas in the New York area over gypsy moth spraying programs. If the question of Miller Amendment enforcement falls into the hands of disgruntled minority groups, an unfriendly or sensationalist press, or a misinformed public, the uproar that might occur would put the gypsy moth quarrel in the shade. And the agricultural chemicals industry would doubtless bear the verbal and economic brunt of a new anti-chemicals crusade.

With so much to gain—or lose—on the basis of the Miller Amendment's effectiveness, it appears the agricultural chemicals industry should do no less than its best to see that pesticide users abide by residue tolerances. The industry supported the legislation, and expects its over-all effects to be beneficial. It would be short-sighted to allow the benefits to slip after having shouldered the Amendment's high costs for additional research and testing.

Here is still another educational or public relations job for an industry which repeatedly finds public relations among its biggest problems.