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The Association does not accept the responsibility for the opinions of contributors. Offensive personalities must be avoided.

A COMPREHENSIVE PLAN FOR A MEMBERSHIP CAMPAIGN.

THERE is probably no more important subject claiming the attention of the members of the American Pharmaceutical Association than the necessity for increasing the membership. While there has been a steady increase in the number of members, the Association has in no wise reached the bounds of its possibility in this direction. For a number of years, the Committee on Membership have been carrying on well conceived and well directed conservative efforts for an increase of membership which have been rewarded by a measure of success. They have gradually paved the way for a larger and more determined effort and a more comprehensive plan.

A study of the roll of members and their geographic distribution discloses the fact that there are a number of states in which we have very few members and in vast stretches of territory there are very few representatives.

It was not intended to limit the scope of the American Pharmaceutical Association to the United States and our insular possessions. The title "American" indicates that its proposed field was to be continental. The druggists and the allied interests of the Provinces of British North America should be made acquainted with the fact that they are eligible for membership and that their interests and problems are properly a part of the work of this Association. Unfortunately, our membership has not kept pace with the opening up and commercial development of these northern countries, and these fertile fields, as well as those of many parts of the United States, still await our cultivation for members and with well directed efforts should yield an abundant harvest.

This is a condition which should not be continued and indicates that as an

association we have not realized our possibilities nor lived up to the full measure of our usefulness. The time is fully ripe for the inauguration of an energetic campaign for members that shall be more than national; that shall now take up the northern divisions of this continent and eventually take in also the Southlands of North America. In these vast areas there are thousands of eligibles. The majority of these have, probably, not even been personally approached and invited to become members.

With every added member the Association is upbuilding its own strength, stability and influence, is adding to its financial as well as its numerical strength and increasing its field of usefulness to the body pharmaceutic.

THE JOURNAL OF THE AMERICAN PHARMACEUTICAL ASSOCIATION has already become a power in pharmaceutical journalism and its influence will become more and more pronounced with its increased circulation resulting from a larger and more representative membership. As its interests and circulation become broader, it will become more and more valuable as an advertising medium and as a means of molding sentiment, guiding opinion and shaping action.

The future advances in pharmacy, whether along the lines of commercial improvement, educational or legislative advancement or professional uplifting, must result from concerted action; from the combined efforts of pharmacists exerted through a strong national organization. It is axiomatic that with increase in our numerical strength will come corresponding increase of influence and power.

The plan now outlined proposes a large and active Committee on Membership under a general chairman who shall have supervision and control of the membership campaign. He is to be supported and advised by vice-chairmen, and each vice-chairman is to have charge of a district comprising a number of contiguous states or provinces. A committee is appointed for each state, insular possession and province; the first named member being the chairman of the said local committee. In the appointment of the local committees it has been the intent, wherever feasible, to select members residing in different sections so as to cover more thoroughly the entire field.

The purpose is to have each local committee through its chairman and members make a thorough canvass of its territory and to see that every person eligible to membership is invited to become a member. Where possible, the solicitation should be by personal interview and where that is not possible, then by mail. At stated intervals each local chairman is to report to his vice-chairman who will submit the report to the general chairman and advise and cooperate with him in furthering the movement.

In addition to these committees formed on geographic lines, there are a number of interests that can be best reached through special sub-committees of co-workers, who will co-operate directly with and report to the general chairman. For this reason, we have the sub-committee on Food and Drug Chemists, Pharmaceutical Faculties, Boards of Pharmacy, Wholesalers and Manufacturers, Pharmacists in the Government Service, Women Members, etc. It is noted that many allied with these branches of pharmacy have not, as yet, joined the American Pharmaceutical Association.

This comprehensive scheme may be criticized by some who have not given much thought to the subject, as somewhat theoretical, and as a rather large un-

dertaking necessitating an extensive committee. However, the plan is based upon a careful and earnest study of the conditions and possibilities. We want to conquer a host and to do this necessitates an army, and this army must be well officered and well disciplined. Moreover, the entire army and membership must understand the necessity and righteousness of the cause and enter the campaign with determination and enthusiasm.

Have we considered the possibilities the situation offers? There are now at least five thousand eligibles who should be members of this Association. Is it too much to expect that by a united effort at least one-half of that number can be induced during this association year to unite with our organization? This certainly is not too ambitious an expectation and we should make this number the minimum of our aim.

To accomplish this, the Committee on Membership should have the support and co-operation of every member of the Association as well as the enthusiastic labor of those who have been named on the Committee.

GEORGE M. BERINGER.



THE TREASURY DECISION REGULATING THE IMPORTATION AND SALE OF COCAINE.

THE recent Treasury Decision No. 33456, regulating the importation and sale of cocaine is one which, if its validity be sustained, will have far-reaching consequences upon every branch of the drug trade, and so far as the retailer is concerned, make it practically impossible for him to dispense the drugs included, even on physicians' prescriptions for legitimate purposes.

The text of the decision, and form of declaration required is as follows:

"Importations of cocaine, coca, their derivatives or preparations containing cocaine or its derivatives shall be released only upon the filing of a declaration of the importer, properly sworn to, made upon the following form:

DECLARATION FOR COCAINE, COCA, THEIR DERIVATIVES AND PREPARATIONS.

"Inasmuch as the indiscriminate and promiscuous use of cocaine, coca, their derivatives or preparations containing cocaine or its derivatives, is dangerous to the health of the people of the United States, and section 11 of the food and drugs act, June 30, 1906, prohibits the importation of any food or drug product into this country which is "adulterated or misbranded within the meaning of this act, or is otherwise dangerous to the health of the people of the United States" * * *, "I subscribe to the following declaration as a condition precedent to the release of the merchandise enumerated therein.

DECLARATION.

"I, (1), of the (2), (3), do solemnly and truthfully swear that the cocaine, coca, their derivatives or preparations containing cocaine or its derivatives, more particularly described in attached invoice, bill of lading, or bill of sale, purchased from (2), by (2), the day of, 191., are intended in good faith for use in a manner not dangerous to the health of the people of the United States, and that I will keep, or have kept, a complete record of (4) in (5) packages of cocaine, coca, their derivatives or preparations containing cocaine or its derivatives, and will secure from each and every person, firm, or corporation to whom the goods

(1) Name of individual or representative.
 (2) Name of individual, firm, or corporation.
 (3) Importer, manufacturing chemist, or wholesaler, retailer, or any other dealer in or purchaser of drugs, as the case may be.
 (4) Number of pounds, pints, ounces, etc.
 (5) Number.

herein described, their derivatives, or preparations shall be sold, in whole or in part, a declaration of this form, which declaration shall be kept on file for a period of not less than three years and be open to inspection of any properly accredited Government inspector.

"I further do solemnly and truthfully swear that each and every package of cocaine, coca, their derivatives, or preparations containing cocaine or its derivatives, more fully described in attached order, bill of lading, or bill of sale, shall bear a statement, in the form prescribed by the regulation for the enforcement of the food and drugs act of June 30, 1906, of the amount of cocaine or cocaine derivatives contained therein.

"I furthermore solemnly and truthfully declare that I will make a report to the Bureau of Chemistry of the Department of Agriculture, Washington, D. C., not later than January 15 of each year of the amount of cocaine, coca, their derivatives, or preparations containing cocaine or its derivatives on hand the first day of January of that year, the amount imported or received during the preceding 12 months, and the disposition made thereof."

.....
.....

"Declared to before me this day of, 191...

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"The above declaration may be filed by the importer at the time of entry of merchandise of the character in question; but if not so filed, it shall be required before the release of the goods.

JAMES F. CURTIS, Assistant Secretary."

It will be noted that the decision specifically provides that the party subscribing to the declaration "will secure from each and every person, firm or corporation to whom the goods herein described, their derivatives, or preparations shall be sold in whole or in part, a declaration of this form, which declaration shall be kept on file for a period of not less than three years and be open to inspection of any accredited Government Inspector."

It further provides that returns shall be made to the Bureau of Chemistry of the Department of Agriculture not later than January 15, of each year, of the amount of the products and their derivatives on hand on January 1 of that year, the amount received during the last twelve months and the disposition made thereof.

In form the decision is mandatory on every person, firm or corporation, under all conditions and every circumstance that may arise, whether it be in compounding prescriptions, furnishing any of the commodities named to the Government service or even the taking of samples by the Bureau of Chemistry, for the reason that there is no saving clause or exception whatsoever contained in the decision.

If the decision is legal, that is, if it be upheld by the courts, it will mean that Congress has the right to delegate power to an administrative officer to refuse admission to, or to determine the conditions under which, not only cocaine and its derivatives, but every other potent drug, may be admitted to the United States, and subsequently disposed of both in interstate and intrastate commerce, for there are no potent drugs that are not "dangerous to the health of the people" when indiscriminately and promiscuously used. In other words, if such a delegation of legislative power is valid, the administrative officers of the Treasury Department would have greater power to regulate commerce between and within the several states than Congress has ever pretended to have or has ever attempted to exercise.

The administrative officers of the Bureau of Chemistry have stated that they will accept legitimate prescriptions on file with retail druggists as complying with

the terms of the decision as to returns, but it is difficult to see where they find authority to set aside any of the provisions of the decision. No such authority is granted them under the decision. The decision is mandatory in its terms and makes no provision for exceptions. Furthermore the purchaser has made an affidavit that he will demand such a declaration before he disposes of any of the commodities in whole or in part, and the retail druggist will therefore be required to obtain a sworn declaration with each and every prescription he may receive before he can dispense the same.

As it will be impossible to obtain a sworn declaration with every prescription, and as no other provision has been made whereby these commodities can be sold, it follows that the retail druggist cannot dispense cocaine, coca, their derivatives or preparations on prescriptions not accompanied with a sworn declaration.

If the sale is made only on a sworn declaration, the retail druggist will violate state law, and in the District of Columbia, a law enacted by Congress, which requires that such sale shall be made on a prescription of a physician, dentist, or veterinarian. Can an Act of Congress be set aside other than by Congress or the Courts?

It may be further pointed out that no provision is made whereby any branch of the Government Service, Public Health Service, Hospital Corps of the Army or Navy, may be able to obtain any of these commodities except on filing a sworn declaration with the seller; nor can the commodities be transported from station to station otherwise than on this declaration. An inspector of the Bureau of Chemistry could not obtain samples of the articles covered by the decision except on the presentation of such declaration, and he would be compelled to obtain a like declaration before he could turn over the samples to the Bureau of Chemistry, because he has made an affidavit to that effect, and there is no proviso or saving clause in the decision to meet such contingencies.

I therefore submit that the decision is impracticable and cannot be carried out; that it imposes burdens that cannot be overcome; that it is prohibitory in every sense of the word; and that it places conditions upon licensed pharmacists, physicians, dentists and veterinarians that cannot be complied with, and restricts them in many cases where the dispensing of the said commodities is necessary.

S. L. HILTON.



OFFICERS FOR 1914-1915.

JUST as this issue is ready for the press the report of the Board of Canvassers comes to hand announcing the election of the following officers for 1914-1915:
President, Caswell A. Mayo, New York.

First Vice President, L. D. Havenhill, Lawrence, Kan.

Second Vice President, C. Herbert Packard, East Boston, Mass.

Third Vice President, Charles Gietner, St. Louis, Mo.

Members of the Council, Otto F. Claus, St. Louis; M. I. Wilbert, Washington, D. C.; William B. Day, Chicago.

The JOURNAL extends congratulations to the newly elected officers—congratulations in which all members of the Association, including the other nominees on the ticket, heartily join.

J. H. BEAL.