Underscoring the Food-Pharmacy Relationship

I write in support and to underscore the importance of the remarks stated in your editorial "Food and Pharmacy-A Close Relationship" ¹. You have accurately pointed out that recent legislative history has not focused heavily on matters of food safety evaluation. Many of our colleagues in pharmacy and the other basic medical sciences have been deeply involved in drug legislative matters. However, on issues of food safety, I find myself in a somewhat unique, and at times lonesome, position. Many classmates and colleagues in pharmacy and pharmacology are active in appropriate pharmaceutical and pharmacological professional societies, so too it is with other colleagues in the Institute of Food Technologists. However, there are precious few pharmacists and pharmacologists/toxicologists who have looked beyond the world of pharmacy and pharmacology to the potential for the pharmacologic effects of foods. Many of us have tried to point out that numerous problems in toxicology and safety evaluation are common to both foods and drugs. With foods we are often dealing with longer term exposures of test materials administered at levels on the lower portions of the slope of the dose response curve. But the ultimate goal of these researchers is the same-extrapolation of toxicity findings, if any, to man.

The thrust of our testimony before Senator Hatch² was to call for an updating of the scientific thinking behind the Delaney Clause to give FDA scientists, specifically, and science in general discretion for scientific judgment as now allowable under the general provisions of the Food, Drug and Cosmetic Act, but not permitted by the absolute strictures of the Delaney Clause. We are not calling for a weakening of food safety laws as some have worried.

It is clear that advances in science and technology referred to by Senator Hatch and mentioned in your editorial, must include studies for the potential for food and drug interactions, both from the standpoint of potential benefits, as well as risks to the consumer, which may be, as you point out, every bit as important and critical as drug-drug interactions.

Unfortunately, ranking minority member Kennedy was not present throughout the hearings. It is hoped, however, that the hearings can and will result in meaningful bipartisan food safety legislation.

Andrew G. Ebert Research, Development and **Quality Assurance** Pet Incorporated St. Louis, MO 63116 Received September 14, 1983.

¹ E. G. Feldmann J. Pharm. Sci., **72**, 723 (1983). ² Senate Committee on Labor and Human Resources hearing, June 10, 1983, Senator Oran Hatch, Chairman.

Full Disclosure Should Apply to All

I read with interest your editorial in the August issue of the Journal of Pharmaceutical Sciences¹. At the same time I am concerned that you may not be aware that Dr. Jacobson of the Center for Science in the Public Interest (CSPI) is hardly a case study in full disclosure when it comes to addressing the issue of how CSPI is funded.

The American Council on Science and Health (ACSH), a scientific consumer education organization, has carefully documented² the secretive and inconsistent activities of CSPI, an organization which owes its existence to the perpetuation of consumer fear of technological advances. We have here a classic example of one living in a glass house and throwing stones. I would be happy to provide copies of the above mentioned article to interested readers.

My point is this—it is just as valid to question the motives of Jacobson and CSPI as it is the motives of scientists who take stands on public issues-and I wish you would have done so.

David B. Roll

Professor of Medicinal Chemistry Associate Dean for Academic Affairs The University of Utah College of Pharmacy Salt Lake City, UT 84112

Received September 20, 1983.

¹ E. G. Feldmann, J. Pharm. Sci., **72**, 843 (1983). ² ACSH News and Views, **3**(4), 8 (1982).

Author's response:

In quoting Dr. Jacobson, I intended to pass no judgment-nor did I so indicate in my editorial-regarding his personal prejudices, allegiances, or freedom from bias. I know really nothing about the man, but I felt then, as now, that what he wrote was right and proper behavior for all scientists to follow. And as a scientist himself, I would expect Dr. Jacobson to adhere to this same standard of performance along with the rest of us who regard ourselves as scientists.

Edward G. Feldmann

American Pharmaceutical Assoc. Washington, DC 20037