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food. The White House representative should chair the committee. This committee might enlist top people from the National Institutes of Health, the National Academy of Sciences, the American Medical Association, the Veterinarian's Association and like scientists.

If these two steps are taken, a bad news break would not catch us flat-footed.

In any case, we need to know more about this problem. The problem grows faster than our knowledge concerning it so that in the absence of some action, similar to that above outlined, our posture progressively worsens.

A draft of this memorandum has been submitted to Agriculture and HEW. The present statement contains most of the suggestions made by those agencies. They consider this a desirable step.

Don Pearlberg

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2. The confidence of the public in the food supply could be shaken, with harmful effect on demand for milk and meat and hence on farm prices and income.
3. The food trade could be upset by widespread condemnation of products if suitable tests were found and tolerances were enforced.
4. The agricultural chemical industry could be upset, with harmful effects on invested capital and on established methods of agricultural production.

I have discussed this problem confidentially with various persons in HEW, USDA, the White House Staff and the food trade.

My recommendations are these:

1. That the 1961 budget for the relevant bureaus of HEW and USDA be increased to provide for increased work:
 - a) To find suitable new substitute chemicals for the troublesome pesticides now in use.
 - b) To engage in more research on the effect of these pesticides on human health, thereby permitting a re-examination of tolerance levels.
 - c) To permit greater inspection and regulatory activity.
2. That there be established, with public announcement but without fanfare, a committee consisting of the Secretary of Agriculture, the Secretary of Health, Education and Welfare, and, since this is an interdepartmental affair, Bob Merriam of the White House Staff, to inquire into the whole problem of chemical agriculture and human

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exceeding the tolerance level by ten, fifty, or one hundred times. But no practical test for meat has yet been devised which is fast enough to yield a result before the meat has been eaten.

As yet there have been no deaths known to have been caused by eating food contaminated by these pesticides. The tolerances seem to be set low enough to protect human health but the real problem is to hold the residues to tolerance levels. In time, as these residues build up, there could be a serious threat to health.

The facts outlined above are known to a limited number of persons in scientific circles, in the regulatory agencies, and in the food trade. At least one newsman has the essential facts and has thus far refrained from releasing them. There has been no general publicity and confidence in the safety of the food supply remains at a high level.

Though the threat to human health does not appear to be great or immediate, an outbreak of sensational journalism could have these unfortunate effects:

1. The Administration could come in for severe criticism:
 - a) Agriculture, for having certified the offending chemicals and for having failed to safeguard the wholesomeness of meat.
 - b) Health, Education and Welfare, for setting unrealistic tolerances, or for failing to police the tolerances, or both.
 - c) Bureau of the Budget, for having held a tight rein on these Bureaus, Services and Administrations in USDA and HEW which are charged with regulatory activities in these areas. (The Federal Government now spends many times as much money studying the effect of these pesticides on wildlife than it does on human beings.)

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November 3, 1959

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MEMORANDUM FOR

MR. MORGAN

The use of chemicals for the killing of insects, diseases, parasites, weeds, and fungi has grown rapidly in agriculture. Annually it is a half-billion dollar business.

Increasingly, residues of these pesticides are appearing in human food. Spray residue is retained on fruit. Farm animals ingest food carrying residual amounts of this poison, and absorb the toxic elements of fly spray through their skin. The material accumulates in the animal tissues. We eat it with the meat. It appears in milk.

The Food and Drug Administration establishes tolerances for these pesticide residues. The tolerances generally are based on data obtained on experimental animals. Man may be more susceptible to a poison than the test animal. People whose vital functions are impaired because of age or disease may be unusually susceptible. High safety factors are employed in establishing tolerances. Generally the tolerance level on man's food is one percent or less as much pesticide as will cause no demonstrable harm to the test animal.

On certain commodities, Food and Drug has responsibility for policing tolerances. On other commodities, such as meat, Agriculture has responsibility.

With the increased use of pesticides, many articles of food are now exceeding the tolerances. For milk, the regulations allow no residue whatever. But most milk samples contain some. For meat, occasional tests show samples which contain residue

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4/24/74