doubtful that any board today, in spite of the Warner-Lambert decision, would take such an extreme position, and we heard yesterday some others who testified recently in this matter, in contradiction to outside opinion, but by following such a procedure of observation and review, a board would establish an ethically consistent approach to all promotional programs for its company's products no matter where the promotion was directed.

The current trend toward the personal responsibility of corporate officers and directors for all actions of their companies, and particularly those which affect the health and welfare of their customers, is one which has to be taken very seriously, indeed, in the pharmaceutical industry and here is a good place to start. It seems clear that most boards would prefer to rely on some combination of their own internal research standard and that of the FDA, or other appropriate regulatory body. But any such combination would have to define and establish, in advance, guidelines for aggressive promotion men for whom sales volume is the overriding issue.

If the pharmaceutical industry cannot find within its own operations the solution to the obvious problem it creates for itself by promotional practices which set different standards for different peoples, then a solution will be forced on it in one way or another from outside. Several possibilities are immediately apparent, the most obvious being expanded governmental regulatory control made possible by enabling legislation. Certainly, the conduct of American industry overseas is receiving all kinds of attention these days, most of it sharply critical, and there will be plenty of precedents for the imposition by the FDA of some kind of sanctions against those who stray from U.S. standards in their conduct of their foreign business ventures. Even if the only practical method to do so is to demand industry to protect its stockholders from the liability claims inevitably arising from damages related to improper drug use by observing defensible standards of product, a way can and will be found to do it.

Control through the World Health Organization is another possible way to insure that only balanced, accurate, and scientifically documented claims are made for medicinal preparations anywhere in the world. This body could certainly assume an advisory position in this area which would be of great value especially to those countries without their own body of scientific knowledge and expertise.

Nine years ago Dr. Helen Taussig has described to the committee in earlier hearings some of the possibilities that could be developed along World Health lines, but clearly a lot more study is necessary to make sure that objective medical standards can be so achieved staying clear of all the varying social and political pressures that all too often seem to become dominant in a global approach to any problem.

Nine years ago before this committee I stated that a pharmaceutical manager must accept the fact that his industry indeed carries a high degree of social responsibility or he can see that social responsibility spelled out for him slowly but surely by legislation prescribing more and more of his operations, and taking over more and more of the functions he now guards so fiercely.

The thrust of those hearings concerned prices in the pharmaceutical industry, but my comment is just as applicable today to promotional practices which seem to the public to ignore any feeling of responsi-