

extreme position 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 towards 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 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 define and establish, in advance, guidelines for aggressive promotion men for whom sales volume is the over-riding issue.

If the pharmaceutical industry can not 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