not jibe if someone were to add up our weekly recall lines and check it against this testimony.

(The information referred to follows:)

DRUG RECALLS, FISCAL YEAR 1967

|                            | Reason | Total     | PMA number | Non-PMA member  |  |
|----------------------------|--------|-----------|------------|-----------------|--|
| Subpotent                  |        | 29<br>120 | 12<br>26   | 17<br>94        |  |
| . con. pen<br>. con. other |        | 3<br>41   | 1 1        | 0<br>2<br>37    |  |
| x—OTC                      |        | 2<br>5    | 0<br>0     | 2<br>5<br>5     |  |
| isintegration              |        | 45<br>180 | 3<br>33    | 42<br>147<br>13 |  |
| lisbranded<br>ecomposition |        | 8<br>15   |            | 3<br>14         |  |
| ert. revoked               |        | 42<br>61  | 18         | 41 43           |  |
| Total                      |        | 1 2 584   | 8 113      | 4 471           |  |

<sup>1</sup> Excluding 38 investigator terminations, 6 vet. vitamins, 20 vet. drugs, 2 diagnostic agents, and 1 med. feed. 2584 recalls by 164 firms. 3113 recalls by 46 firms. 4471 recalls by 118 firms.

RECALLS, FISCAL YEAR 1967-DRUGS

| Reason  | Rx                   | Non-Rx               | Anti-<br>biotics       | Bulk<br>drugs     |                  | vest<br>drugs     | Vita-<br>Human    | Total                    |
|---|----------------------|----------------------|------------------------|-------------------|------------------|-------------------|-------------------|--------------------------|
| Label mixup                                       | 25<br>75<br>8<br>0   | 4<br>3<br>0<br>0     | 0<br>30<br>0<br>1<br>1 | 0<br>0<br>0<br>0  | 0<br>0<br>0<br>0 | 0<br>0<br>0<br>0  | 0<br>12<br>0<br>0 | 29<br>120<br>8<br>1<br>3 |
| Substandard RX-OTC No NDA IND term Investor, term | 29<br>2<br>0<br>0    | 2<br>0<br>0<br>0     | 1<br>0<br>0<br>0       | 0<br>0<br>0<br>0  | 0<br>0<br>5<br>0 | 0<br>0<br>5<br>38 | 9<br>0<br>0<br>0  | 41<br>2<br>5<br>5<br>38  |
| Disintegration                                    | 25<br>112<br>10<br>3 | 19<br>14<br>3<br>4   | 0<br>3<br>5<br>0       | 0<br>31<br>0<br>0 | 0<br>0<br>0<br>0 | 0<br>0<br>0<br>0  | 1<br>20<br>1<br>1 | 45<br>180<br>19<br>8     |
| Nonsterile<br>Certificate revoked<br>Other        | 4<br>0<br>41<br>335  | 6<br>0<br>9<br>————— | 5<br>42<br>6<br>—————— | 0<br>0<br>0<br>31 | 0 0 0            | 0<br>0<br>        | 0<br>5<br>        | 1 622                    |

<sup>1</sup> Excluding 6 vet. vitamins, 20 vet. drugs, 2 diagnostic agents, and 1 med. feed.

Mr. Gordon. As I understand it, 46 firms of the PMA's 140 had recalls?

Dr. Goddard. That is correct.

Mr. Gordon. That means 32.5 percent, is that right?

Dr. Goddard. Yes, sir.

Mr. Gordon. Of the 760 non-PMA members, 118 firms had recalls, is that correct?

Dr. Goddard. That is correct.

Mr. Gordon. That is 15.5 percent of non-PMA firms. In other words, PMA members had twice as many recalls as non-PMA members?

Dr. Goddard. Correct. As far as number of firms go. Now, they manufacture 19 times the units of drugs as the small companies, so that has to be taken into account, too.