

Dr. Durward Hall testified some weeks back, we had a little colloquy about the 4,600 drugs that FDA tested. I quote from his testimony:

I agree with you and with Dr. Goddard perfectly, when we hear that all drugs are the same but it is a myth—and that Dr. Goddard himself has exploded the myth. He says he would like to say that they are all the same potency, that they are all of the same value, that they will all have the same effect on the human, which is what we are interested in, and that will have the same quality, but that actually it is not true.

Now, actually, you know, and I know that recently, his studies—referring to Dr. Goddard's studies—

on potency have been found to be off and I think that he and his office have admitted this.

Senator NELSON. No, I am sorry. They concede out of 4,600 samples only five errors; is that not correct?

And that is a small margin of error.

Dr. HALL. Mr. Chairman, I would have to disagree with that source of information. I don't know where you got it because I spent all day Friday with Dr. Goddard and in his laboratory, and with his chief scientists in his laboratory where these analyses are performed. Dr. Summerson, and they are very free to admit that the initial analysis—and they have no funds for further detailed analysis—was very sketchy and they wished that the statement had not been made. They made the statement.

Senator NELSON. They made the statement, as I understand it on Friday, conceding five mistakes, and we checked with their office.

Do you want to make an observation about this so we will have the record straight? The PMA, I believe, has criticized the study to me personally in my office and in news releases. I think it would be helpful to have the record correct.

Dr. GODDARD. If I may, sir, I have a brief statement I would like to submit for the record on this.

Senator NELSON. It will be printed in full in the record.
(The document referred to follows:)

MARKET AND MANUFACTURERS SURVEY: POTENT DRUGS—1966

This program projected the analysis of approximately 5,000 samples of drugs in 20 categories to be completed by May 6, 1966, based on available analytical resources.

The program was limited to composition analysis of products containing one of the following listed drugs as the single or principal active ingredient:

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| 1. Digitalis and cardiac glycosides | 12. Antiarrhythmic-cardiac Drugs |
| 2. Corticosteroids | 13. Diuretics |
| 3. Anabolic steroids | 14. Nitrites |
| 4. Sex steroids | 15. Anticonvulsants |
| 5. Other Hormones | 16. Central Nervous System Depres- |
| 6. Anticoagulants | sants |
| 7. Antihypertensives | 17. Central Nervous System Stimulants |
| 8. Ergot Preparations | 18. Antimalarials |
| 9. Hypoglycemics | 19. Chemotherapeutics |
| 10. Menadione and derivatives | 20. Antithyroid Drugs |
| 11. Antihistamines | |

The stated objective of the sampling program was to obtain at least one sample of each dosage form in the listed categories from each primary manufacturer. Repackers and distributors were specifically excluded. Provision was made, at the Districts' discretion, to collect more than one sample from manufacturers having a substantial production of a given drug or where there was a questionable compliance background.

Official USP or NF analytical procedures were specified for some drugs and reference made to NDA procedures for others. In absence of specific instructions, the Districts were instructed to examine official drugs by methods in official