

trade-name drug may have to be recalled just as rapidly as a generic name drug and vice versa. We hope that, we think we have the mechanism for getting the drug back off the market on signs of danger.

Mr. GORDON. But the size of the company has nothing to do with the efficiency of recall, then?

Dr. GODDARD. Nothing. They may have a more expensive computer system that will turn out the identification of the invoices, but we require that all companies, large and small, have that capability.

Senator NELSON. From your experience with recalls, do you find any significant difference between the efficiency and the effectiveness of the recall between or among the various companies?

Dr. GODDARD. We find differences; yes.

But we insist that, depending upon the nature of the hazard that calls for the recall, that steps be taken to get the drug back in the most expeditious way. If it happens to be a small firm that cannot do the job, then we have to use our own resources to get it back. But we do have, as I have said, under our requirements for good manufacturing practice, a provision to require this capability.

Senator NELSON. You mean that if a company does not have the capability, FDA will do it for them?

Dr. GODDARD. We had an instance, Senator, in which a company put on the market a—it was not a drug, but a highly flammable, explosive waterproof compound, "X-33". It was necessary that that come off the market and come off the market promptly. The company did not have the money or the ability to get the product back, so we had to make hundreds of seizures throughout the United States in the interest of lifesaving from accidents that could have occurred.

Now, the same could happen with a drug. But we expect to have as a part of our good manufacturing requirements a provision that before a person can deal in drugs, he will have the capability of getting the product back, which does not mean that Food and Drug will never be called on to use its facilities. We frequently are.

Senator NELSON. Do you find differences in either frequency or efficiency on the recalls based upon the size of the company?

In other words, the point I am getting at here is whether small companies are less effective than big ones?

Dr. GODDARD. In general, the larger the company, the more responses they can afford and have available to devote to the problem; yes. So there are differences.

Do not forget, we have a well-defined system in which these take place, namely, the pharmaceutical wholesalers and the retailers, the drug store. These are well identified, whereas if you are dealing with other commercial products such as a solvent or a cleaner, it may be in a host of outlets of different kinds. So you have a much tougher problem.

We had an oven cleaner recently that posed a threat. It was very difficult. The effectiveness of that company's recall—and we worked with them on this—was at a very low level because of the diversity of the kinds of outlets, you see. So the drug business is truly unique in many respects, and this is one of them.

Senator NELSON. A few moments ago, you were discussing LSD and marihuana. I understood you to say that they are used socially; there-