many drugs that exceed the standards of the United States Pharmacopeia, of the National Formulary, and of the Food and Drug Administration. In testimony from all three of these groups—the Food and Drug Administration, United States Pharmacopeia, and the American Pharmaceutical Association—each one stated that the extra requirements of the DOD in almost all cases have no medical significance, are redundant, are without merit, and whatever the intent, tend to eliminate competition. I assume you have read the testimony, of the USP, the National Formulary, and Food and Drug Administration on this point.

General HAYES. I have not seen it, but I am familiar with the content.

Senator NELSON. What would your comment be about these extra requirements of the DOD.

General HAYES. This really relates to the statement in the short summary which I will reread.

We have instituted a comprehensive review of all essential characteristics to eliminate those elements which might be unduly restrictive, such as package, color and tablet size. We have recognized this and we have taken action. We have already done 400 of these drug items and reviewed them and eliminated these types of things that you are talking about. We started that in August of 1973.

Senator NELSON. Well, do you agree with the general conclusion of FDA, USP and the National Formulary that in almost all cases these special requirements, as one of them put it, have no medical significance or are redundant or without merit and whatever the intent, tends to eliminate competition?

General HAYES. I can't answer in respect to all instances because that is what we are reviewing. But the intent and thrust of that statement we agree with entirely.

Mr. GORDON. General, would it be fair to say, then, or can we conclude, then, that the DOD is getting drugs which are no safer, no more effective, than the rest of the country?

General HAYES. I would say that is a fair conclusion.

Can I enlarge on that statement before this last one just one moment?

Senator NELSON. Sure.

General HAYES. When we are talking about medical quality we have a little problem in storage and shipping, as you know. That specification for a certain item we are always going to have to hold with will be different from the civilian procurement. But that is a logistics problem, to protect the integrity of the drug which is shipped. It is just a difference——

Senator NELSON. Are you talking about a packaging specification for a drug which you may be sending into a tropical area or may have to store under circumstances that are not as favorable as they would be here or that have to be shipped and hauled and moved under conditions that are quite different from what they would be within the continental United States? The packaging of drugs that are going to be used under those conditions must be special. Is that what you are saying?