

OCT 3 1968



MERCK CHEMICAL DIVISION

MERCK & CO., INC. • RAHWAY, NEW JERSEY 07065

October 7, 1968

Mr. Morgan M. Hoover
Manufacturing Chemists' Association, Inc.
1825 Connecticut Avenue, N. W.
Washington, D. C. 20009

Dear Morgan:

SUBJECT: REPORT OF FIFTH SESSION
OF CODEX COMMITTEE ON
FOOD ADDITIVES

With your letter of August 13, you forwarded a copy of the above Report. You asked that the Report be reviewed prior to the October 10 meeting. Since a conflict will prevent me from attending the meeting, I will here set forth for your consideration the comments of our scientific people:

1. Paragraph 3 states that a paper prepared and introduced by the U. S. Delegation contained proposals that there should be no residues of antibiotics in human food at the time of consumption. We take sharp exception to this blanket statement, which conflicts directly with AHA's efforts to have FDA establish a tolerance for Streptomycin in animal tissues intended for human food.

2. Paragraph 9 contains a statement by the Delegation of New Zealand pointing out that there is no real need for the use of hormones in animal production. While we may be dealing here with a matter of semantics, we feel that this statement should not be left unchallenged by the U. S. Delegate. The use of stilbesterol in cattle production in the United States is a well-recognized and approved practice and there is no question but that it provides substantial economic benefit.

3. Paragraph 33 states that a number of delegations were of the opinion that the use of isoascorbic acid and its salts created problems in clinical analysis and there were also

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nutritional aspects involved. We are not aware of any facts to support such a statement. The use of isoascorbic acid and its salts is largely confined to cured meat; it is not added as a vitamin and one doesn't look to cured meat as a source of Vitamin C. Isoascorbic acid is not an anti-vitamin C; to the contrary, there is one report in the literature which indicates that it has about 5% of the anti-scorbutic activity of ascorbic acid. We know of no evidence that the use of isoascorbic acid in cured meat leads to blood levels which confuse in any way clinical analysis. Again, we believe that the U. S. Delegate should challenge this statement on the basis of the approved uses of isoascorbic acid in the United States. It is interesting to note that Dr. Fitzhugh of FDA, who preceded Dr. Blumenthal as U. S. Delegate to this Committee, was actually the man to establish the safety of isoascorbic acid as a food additive more than 20 years ago.

Sincerely,



Frank P. DiPrima
Attorney

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