The levels of polychlorinated biphenyl contamination of food products and packaging are declining, the Food and Drug Administration was told in continuing comments on its proposal for interim PCB tolerances, but the packaging and infant food industries are unable as yet to meet FDA's proposed limits.

The National Canners Association said processors of infant foods had found it impossible to comply with FDA's proposed 0.1 p.p.m. limit for its products, continuing: "Rejection rates are now about as high as practical operations will permit and yet they are not sufficient to achieve the 0.1 p.p.m. level for all infant foods."

The Boxboard Research and Development Association told FDA of the results of March, 1971 and April, 1972 surveys which showed maximum levels of PCBs in combination paperboard had declined from 50 p.p.m. to 38 p.p.m. in the 13 months. The percentage of samples below 10 p.p.m. went from 87% to 93% in that time period, and the percentage below 5 p.p.m. went from 70% to 77%.

The Association recommended that FDA's limits for packaging be based on permissible limits in the packaged foods. Also, BRDA noted, an exemption from regulation should apply when foods are packaged in cans or glass containers.

Noting a "limited accuracy" for present testing methods, BRDA said the development of the test "is a fantastic achievement," but:

> "It should be realized that this test requires several hours for a determination, uses sophisticated equipment and must be performed by highly trained, competent personnel. It is a research tool and not a test suitable for routine production control."

The Association pointed out that waxed glassine inner wrap can be used as a barrier against food contamination. Also, BRDA said a method of treatment of raw materials is being investigated in which PCBs are "washed out" of a mixture of water and paper fibers.

The Borden Company also told FDA that the current state of analytical technology does not permit reliable testing. The company said: "At the least we believe the FDA should promulgate standard extraction and test procedures for various classes of materials along with the expected deviation of each procedure. This would provide added assurance to both the public and the food industry."

Borden asked a minimum of 90 days for compliance after promulgation of an FDA regulation, saying it would take longer than the proposed 30 days for manufacturers to incorporate the new requirements into a company's quality assurance procedures.

The Consumers League of Ohio said it "supports the FDA proposal to ban use of recycled paper for food packaging and to limit the residues permissible in food." The

League urged further that the proposed limits be reduced or eliminated within six months.

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FDA REFUSES TO PUBLISH JACOBSON PETITION ON FD&C VIOLET 1

The Food and Drug Administration has denied the form and substance of a petition from Michael Jacobson of the Center for Science in the Public Interest calling for delisting of FD&C Violet No. 1.

In a latest attempt to get FDA to publish his petition over agency protest, Jacobson had called for publication "so that independent outside experts may express their opinion on the degree of hazard of this chemical" (See FOOD CHEMICAL NEWS, June 19, Page 23). Noting that four months had passed since he had filed the petition with FDA, Jacobson also stated:

> "I would like to remind you that the only decent experiment that has been done - - the only chronic feeding study involving female animals - - indicated that Violet 1 causes cancer, particularly in females. Experiments on dogs caused mysterious skin lesions. At best this additive is egregiously tested, not meeting the most minimal standards suggested by any authoritative body including the National Academy of Sciences-National Research Council; at worst it poses a grave threat of cancer. In either case, common sense and the law require that Violet 1 be banned."

Jacobson said use of the color is "skyrocketing" from 8,897 pounds certified for food color use in fiscal 1970 to 49,052 pounds in the first nine months of fiscal year 1972. He said the color is "now probably being used in all categories of foods: ice cream, baked goods, soft drinks, sausage, yogurt, candy, and the ink used to stamp USDA's inspection mark on meat."

Sam Fine, FDA Associate Commissioner for Compliance, wrote to Jacobson on July 26 that:

> " . . . The FDA has already pursued the scientific questions raised by your petition by obtaining as provided in the Act, the opinion of experts, who are eminently qualified, by training and experience, to present a scientific judgment on this matter. In addition, after reviewing their recommendations, we concurred in them and are proceeding to implement them.

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