and needs, and ... provide the coordination and staff assistance necessary for their resolution," the memo said, adding that Tepper's office "also provides a review and appeal function for the Commissioner in cases involving hearing requests for animal drugs."

The General Counsel's office and Associate Commissioner for Compliance Sam Fine "have their well-established legal and regulatory policy review responsibilities to perform in connection with regulations issued by the Commissioner," Gardner wrote.

The new FDA Toxicology Committee (See FOOD CHEMICAL NEWS, March 31, Page 30) "also will be involved in a scientific advisory capacity," the memo said, explaining that the Committee's participation "generally will follow those used by other Bureaus for obtaining scientific advice." Details of Committee operation are being developed by Tepper's Office, Gardner said, adding, "It is clear that it will be needed to help establish appropriate criteria for toxicology evaluations as well as to conduct reviews of scientific issues brought to it."

The memo said that except for the new Toxicology Committee, "no new elements have been introduced into the process ...," so that "what is needed now is a better way to communicate so that issues ... identified ... can be squarely addressed and resolved."

FDA POSITION ON PCB'S IN PAPER TO BE SUPPORTED BY N. Y. AGENCY

The New York Department of Health, which is one of the parties that has filed an appearance for the upcoming hearing on polychlorinated biphenyls in paper and paperboard (See FOOD CHEMICAL NEWS, April 21, Page 2), will support the Food and Drug Administration's position that PCBs should be limited to 10 p.p.m. in paper food-packaging materials.

In a letter to FDA, the Department said that experiments in the hen and the rat show adverse effects with daily PCB intakes of 6 mg/kg body weight.

The agency said that adulteration of food by 10 p.p.m. of PCBs in paper food packaging material "has been shown," calculating that an infant could ingest "one hundredth of the level shown to cause deleterious effects in two species." New York added, "In the absence of specific data on human infants, the allowable level of PCBs in paper food packaging materials should be kept at an absolute minimum."

The letter also said that, "The contamination produced by food packaging will be added to PCB contamination already present in the food before packaging."

Appearances for the hearing were filed last week by FDA's Bureau of Foods and by Diamond International Corp. In addition to the New York agency, appearances had previously been filed by the American Paper Institute, Newark Boxboard, Crown Paperboard; and Middletown Paperboard.