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FM ALBERT V GILPATRICK DIR DIV OF FEDERAL-STATE RELATIONS/HFD
  HFD-317 FDA DHEW ROCKVILLE MD
TO ALL ACTUAL STATIONS NR-1 NR-2 NR-4 THRU NR-36
INFO RUEAHHS/AMEMBASSY KINGSTON JAM
TO RUEHGT/AMEMBASSY GUATEMALA GUA
RUEHSV/AMEMBASSY SAN SALVADOR ELS
RUEHTG/AMEMBASSY TEGUCIGALPA HON
RUEHMA/AMEMBASSY MANAGUA NIC
RUEHPN/AMEMBASSY PANAMA PAN
RUEHBR/AMEMBASSY BRIDGETOWN BAR
RUEHPT/AMEMBASSY PORT OF SPAIN TRT
RUEHPZ/AMEMBASSY PARAMARIBO SNR
RUEHBU/AMEMBASSY BUENOS AIRES ARG
RUEHLP/AMEMBASSY LA PAZ BOL
RUEHBR/AMEMBASSY BRASILIA BRZ
RUEHSG/AMEMBASSY SANTIAGO CHL
RUEHBO/AMEMBASSY BOGOTA COL
RUEHQT/AMEMBASSY QUITO ECU
RUEHAS/AMEMBASSY ASUNCION PAR
RUEHLI/AMEMBASSY LIMA PER
RUEHMO/AMEMBASSY MONTEVIDEO URU
RUEHCV/AMEMBASSY CARACAS VEN
RUEHMX/AMEMBASSY MEXICO CITY MEX
RUEHOT/AMEMBASSY OTTAWA ONT
RUEHCR/AMCONSUL CURACAO NEA
RUEHNA/AMCONSUL NASSAU BAH
RUEHSJ/AMCONSUL SAN JUAN PR
RUEHMI/AMCONSUL MIAMI FLA
RUEHNO/AMCONSUL NEW ORLEANS LA
RUEHHO/AMCONSUL HOUSTON TEX
RUEHCG/AMCONSUL CHICAGO ILL
RUEHLA/AMCONSUL LOS ANGELES CAL
RUEHSF/AMCONSUL SAN FRANCISCO CAL
RUEHNY/AMCONSUL NEW YORK NY
RUEHBS/USMISSION USEC BRUSSELS BEL
RUEHGV/USMISSION GENEVA SWZ
RUEHLO/AMEMBASSY LONDON ENG
RUEHPA/AMEMBASSY PARIS FRN
RUEHBO/AMEMBASSY BONN GER
RUEHRO/AMEMBASSY ROME ITA
RUEHTH/AMEMBASSY THE HAGUE NTH
RUEHCP/AMEMBASSY COPENHAGEN DEN
RUEHSM/AMEMBASSY STOCKHOLM SWD
RUEHOS/AMEMBASSY OSLO NOR
RUEHHE/AMEMBASSY HELSINKI FIN
RUEHWR/AMEMBASSY WARSAW PLD
RUEHPG/AMEMBASSY PRAGUE CZE
RUEHBP/AMEMBASSY BUDAPEST HUN
RUEHBM/AMEMBASSY BELGRADE YUG
RUEHSO/AMEMBASSY SOFIA BUL
RUEHBC/AMEMBASSY BUCHAREST RUM
RUEHMS/AMEMBASSY MOSCOW USR
RUEHVI/AMEMBASSY VIENNA AUS
RUEHBE/AMEMBASSY BERN SWZ
RUEHLS/AMEMBASSY LISBON POR
RUEHMD/AMEMBASSY MADRID SPN
RUEHDK/AMEMBASSY DAKAR SEN
RUEHAD/AMEMBASSY ABIDJAN IVO
RUEHLG/AMEMBASSY LAGOS NIR
RUEHNR/AMEMBASSY NAIROBI KEN
RUEHKH/AMEMBASSY KHARTOUM SUD
RUEHAD/AMEMBASSY ADDIS ABABA ETH
RUEHKI/AMEMBASSY KINSHASA ZAI
RUEHLU/AMEMBASSY LUSAKA ZAM
RUEHSA/AMEMBASSY PRETORIA SAF
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RUEHJI/AMEMBASSY JIDDA SAU
RUEHBY/AMEMBASSY BEIRUT LEB
RUEHAK/AMEMBASSY ANKARA TUR
RUEHKP/AMEMBASSY KABUL AFG
RUEHNE/AMEMBASSY NEW DELHI IND
RUEHKA/AMEMBASSY KARACHI PAK
RUEHBK/AMEMBASSY BANGKOK THA
RUEHKL/AMEMBASSY KUALA LUMPUR MAL
RUEHJA/AMEMBASSY JAKARTA INS
RUEHMN/AMEMBASSY MANILA PHI
RUEHSI/AMEMBASSY SINGAPORE SIN
RUEHSE/AMEMBASSY SEOUL KOR
RUEHKO/AMEMBASSY TOKYO JAP
RUEHCB/AMEMBASSY CANBERRA AUL
RUEHWL/AMEMBASSY WELLINGTON NEZ
RUEHFJ/AMEMBASSY SUVA FIJ
RUEHNM/AMEMBASSY NOUMEA NEC
RUEHPP/AMEMBASSY PAPEETE FPO
RUEHPM/AMEMBASSY PORT MORESBY PAP
RUEHGU/AMEMBASSY AGANA GUM
RUEHMJ/AMEMBASSY MAJURO MAR
RUEHPC/AMEMBASSY PONAPE CAR
RUEHTC/AMEMBASSY TRUK CAR
RUEHYA/AMEMBASSY YAP CAR
RUEHKR/AMEMBASSY KOROR PAL
RUEHTR/AMEMBASSY TARAWA GIL
RUEHFU/AMEMBASSY FUNAFUTI ELL
RUEHNU/AMEMBASSY NUKUALOFA TON
RUEHAP/AMEMBASSY APIA WSM
RUEHPE/AMEMBASSY PORT LOUIS MAS
RUEHTN/AMEMBASSY TANANARIVE MAG
RUEHMR/AMEMBASSY MARIGOT GUA
RUEHPT/AMEMBASSY PORT AU PRINCE HAI
RUEHSD/AMEMBASSY SAN DOMINGO DOM
RUEHPU/AMEMBASSY PUNTA ARENAS CHL
RUEHCC/AMEMBASSY CAPE TOWN SAF
RUEHDU/AMEMBASSY DURBAN SAF
RUEHJO/AMEMBASSY JOHANNESBURG SAF
RUEHDA/AMEMBASSY DAMASCUS SYR
RUEHAM/AMEMBASSY AMMAN JOR
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RUEHCO/AMEMBASSY COLOMBO SRI
RUEHRA/AMEMBASSY RANGOON BUR
RUEHVC/AMEMBASSY VIENTIANE LAO
RUEHPH/AMEMBASSY PHNOM PENH CMB
RUEHHK/AMEMBASSY HONG KONG HOK
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RUEHKT/AMEMBASSY KATHMANDU NEP
RUEHKB/AMEMBASSY KABUL AFG
RUEHMC/AMEMBASSY MACAU MAC
RUEHBW/AMEMBASSY BANDAR SERI BEGAWAN BRU
RUEHMB/AMEMBASSY MUSCAT OMA
RUEHDE/AMEMBASSY DOHA QAT
RUEHAB/AMEMBASSY ABU DHABI UAE
RUEHMA/AMEMBASSY MANAMA BAH
RUEHSN/AMEMBASSY SANAA YEM
RUEHAD/AMEMBASSY ADEN PDY
RUEHMG/AMEMBASSY MOGADISCIO SOM
RUEHDJ/AMEMBASSY DJIBOUTI DJI
RUEHBN/AMEMBASSY BONN GER
RUEHBE/AMEMBASSY BERLIN GER
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RUEHKT/AMEMBASSY KATHMANDU NEP
RUEHKB/AMEMBASSY KABUL AFG
RUEHMC/AMEMBASSY MACAU MAC
RUEHBW/AMEMBASSY BANDAR SERI BEGAWAN BRU
RUEHMB/AMEMBASSY MUSCAT OMA
RUEHDE/AMEMBASSY DOHA QAT
RUEHAB/AMEMBASSY ABU DHABI UAE
RUEHMA/AMEMBASSY MANAMA BAH
RUEHSN/AMEMBASSY SANAA YEM
RUEHAD/AMEMBASSY ADEN PDY
RUEHMG/AMEMBASSY MOGADISCIO SOM
RUEHDJ/AMEMBASSY DJIBOUTI DJI
RUEHBN/AMEMBASSY BONN GER
RUEHBE/AMEMBASSY BERLIN GER

DUPLICATE AND CORRECTED COPY

THE FOLLOWING "TALK PAPER" RE PCB'S IN FOODS, DATED 3-25-77, WAS ISSUED BY FDA:

"THE FOOD AND DRUG ADMINISTRATION IS PROPOSING TO LOWER THE TOLERANCES FOR POLYCHLORINATED BIPHENYLS (PCB'S) THAT OCCUR AS ENVIRONMENTAL CONTAMINANTS IN FOODS.

PCB'S ARE HIGHLY STABLE CHEMICALS THAT, DUE TO INDUSTRIAL USE, HAVE BECOME PERSISTENT ENVIRONMENTAL CONTAMINANTS THAT CANNOT BE TOTALLY PREVENTED FROM ENTERING THE FOOD SUPPLY. FDA IS RESPONSIBLE FOR ESTABLISHING TOLERANCES OR LEGAL LIMITS OF THE AMOUNTS OF SUCH UNAVOIDABLE CHEMICAL CONTAMINANTS IN FOODS. ANY FOOD THAT CONTAINS MORE THAN THE LEGAL LIMIT IS SUBJECT TO FDA REGULATORY ACTION IF SHIPPED IN INTERSTATE COMMERCE.

PAGE TWO

UNDER THE FDA PROPOSAL, THE LEGAL LIMIT FOR PCB'S WOULD BE LOWERED FROM 2.5 PARTS PER MILLION (PPM) (THAT MEANS 2.5 PARTS OF PCB'S FOR EVERY MILLION PARTS OF THE PRODUCT) IN THE FAT OF MILK AND DAIRY PRODUCTS TO 1.5 PPM; FROM 5 PPM TO 3 PPM IN THE FAT OF POULTRY; FROM 5.5 PPM TO 9.3 PPM IN EGGS; AND FROM 5 PPM TO 2 PPM IN FISH AND SHELLFISH.

RECENT STUDIES EVALUATED BY FDA INDICATE THAT PCB'S FED IN HIGH DOSES CAUSE LIVER TUMORS IN LABORATORY TEST ANIMALS. (THE DELANEY CLAUSE OF THE FOOD, DRUG, AND COSMETIC ACT, WHICH PROHIBITS THE ADDITION TO FOOD OF ANY ADDITIVE THAT CAUSES CANCER IN MAN OR TEST ANIMALS, DOES NOT APPLY BECAUSE PCB'S ARE NOT INTENTIONALLY ADDED TO FOOD, BUT RATHER FOOD BECAUSE OF THEIR PRESENCE IN THE ENVIRONMENT.)

DURING A JAPANESE INCIDENT IN 1968, PEOPLE ACCIDENTLY INGESTED EXTREMELY HIGH LEVELS OF PCB'S IN CONTAMINATED RICE OIL. [illegible] INCLUDING VOMITING, SKIN LESIONS, SWELLING OF THE EYELIDS, NUMBNESS, [illegible] OF THE MOUTH, AND SWELLING OF THE EYELIDS WERE OBSERVED.

FDA IS PROPOSING TO LOWER THE LEGAL LIMITS FOR PCB'S IN FOOD AS PART OF ITS CONTINUING EFFORT TO REDUCE [illegible] IN FOODS. LOWER LIMITS [illegible] PUBLISHED BY FDA IN 1973. [illegible] SHOULD [illegible] AS CONTAMINATION LEVELS IN FOODS DUE TO [illegible] DECREASE.

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AS A RESULT OF THE RECENT FDA SPONSORED FDA-STATE JOINT RESTRICTIONS ON [illegible], LOSS OF FISH CAUGHT BY [illegible] U.S. THE ONLY DOMESTIC SOURCES OF THESE SPECIES, THE LARGE MOST SUCCESS IN THE AMERICAN DIET [illegible] EIGHT YEARS. ONLY TRACES OF PCB RESIDUES ARE FOUND IN ALL FOOD CATEGORIES EXCEPT FOR FRESHWATER FISH.

FRESHWATER FISH SUCH AS WALLEYE, BASS, COHO SALMON, AND LAKE TROUT HAVE BEEN FOUND CONTAMINATED WITH RELATIVELY HIGH LEVELS OF PCB RESIDUES. MOST OF THESE FISH ARE CAUGHT BY SPORT FISHERMEN OR COMMERCIAL FISHERMEN WHO DO NOT DO BUSINESS IN INTERSTATE COMMERCE AND ARE THEREFORE NOT SUBJECT TO FDA REGULATION.

THE PROPOSED LOWER LEGAL LIMIT FOR PCB'S WOULD APPLY ONLY TO FISH SHIPPED IN INTERSTATE COMMERCE. FISH CAUGHT AND SHIPPED WITHIN STATES ARE SUBJECT TO STATE REGULATION.

IN FEBRUARY 1976, FDA ANNOUNCED ITS SUPPORT OF A NEW YORK STATE BAN OF MOST COMMERCIAL FISHING FROM THE HUDSON RIVER AND ADVISED SPORT FISHERMEN TO LIMIT THEIR CONSUMPTION OF FISH FROM THE HUDSON AND OF SALMON CAUGHT IN LAKE ONTARIO BECAUSE OF HIGH PCB RESIDUES FOUND IN FISH FROM THOSE SOURCES.

PAGE FOUR

SIMILAR RESTRICTIONS HAVE BEEN INITIATED BY OTHER STATE AGENCIES PARTICULARLY IN THE GREAT LAKES REGION.

FDA EMPHASIZES THAT MOST FISH IN THE AMERICAN DIET COME FROM SALT WATER SOURCES AND ARE RARELY CONTAMINATED WITH PCB RESIDUES.

THE PROPOSAL TO LOWER THE LEGAL LIMITS FOR PCB'S IN FOODS WILL BE PUBLISHED IN THE FEDERAL REGISTER APRIL 1, 1977. COMMENTS WILL BE ACCEPTED FOR 60 DAYS AND MAY BE SENT TO THE HEARING CLERK, FOOD AND DRUG ADMINISTRATION, ROOM 4-65, 5600 FISHERS LANE, ROCKVILLE, MD. 20857."

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SUPPC NAS
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