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On the latter point, the minority held, that the warning on the label for artificial sweeteners, "should be used only by persons who must restrict their intake of ordinary sweets" was not reflected in advertising of firms seeking to develop the "weight-control market."

As an example, the minority accused "TV Bugs Bunny (of) telling mothers and their children that Presweetened Kool-Aid was good to feed children, while the purpose of the warning on the label was to limit use to diabetics or other medical defectives."

A separate view by Rep. McClory (R-Ill.) defended Abbott Laboratories against criticism, and prophesied that the efficacy and relative harmlessness of cyclamates will be established ultimately.

PCB COMMENTS OBJECT TO FAT MEASUREMENT, ASK FEED DISTINCTION

Ralston Purina Company objected to the Food and Drug Administration's use of concentrations of polychlorinated biphenyls in fat for some of its temporary tolerances of the industrial chemical, noting that the foods might be brought within tolerances by reducing the fat content found to be over FDA's temporary tolerances.

The company's comment was among those of a dozen companies and associations objecting to various parts of the FDA proposal (See FOOD CHEMICAL NEWS, May 22, Page 17; and March 20, Page 38), with objections covering the subjects of animal feeds, food packaging and use in fluorescent lights in food plants. Ralston Purina noted that fat content of food varies, and suggested that all of FDA's tolerances should be on an "as is" basis, since toxicity of PCBs is related to "the total intake rather than to the intake in proportion to the total diet."

Poultry was used as an example of the kind of food which could be processed to bring it within tolerance limits. The company suggested an "as is" tolerance of 0.6 p.p.m.

Both Ralston Purina and the American Feed Manufacturers Association asked specific mention in the final regulation of the difference between "complete" animal feeds and "concentrates." AFMA said both are now referred to in the industry as "finished" feeds -- a term used in the FDA proposal -- and noted that a "supplement/concentrate type of feed will often contain high levels of PCB residues." The proposal's reference to "finished" feed should be changed to "complete" animal feed, AFMA said, or supplements and concentrates should be allowed the 5 p.p.m. limit "on a complete feed basis."

AFMA recommended a lower tolerance of 1 p.p.m. for animal feed ingredients not of animal or marine origin, since "substantially lower levels are normally found in ingredients of plant origin."

Agreeing with this position, Ralston Purina said additionally that it assumes the proposed tolerances are intended to apply only to food producing animals, and that this should be spelled out in the regulations. The company continued:

"Many pet foods are composed almost entirely of animal or marine components for which a 5 p.p.m. tolerance is being proposed. Monsanto has reported on feeding studies with dogs indicating no effect from feeding 10 p.p.m. for any of the PCBs for two years . . . Ralston Purina has fed up to 50 p.p.m. PCBs to cats with no adverse effect. We therefore suggest that if FDA finds it necessary to establish tolerances for pet foods, they should be 5 p.p.m."

AFMA also noted FDA's use of the phrase "other harmful or deleterious substances" in the PCB proposal and called it a "practical impossibility to eliminate all substances that could conceivably be harmful." AFMA's comments were endorsed by Acco Feeds.

Three companies noted, as had a governmental advisory committee, the "essentiality" of PCB use in some electrical equipment (See FOOD CHEMICAL NEWS, May 15, Page 42).

Certified Ballast Manufacturers Association said it does not believe the proposal is intended to apply to fluorescent lamp ballasts in lighting fixtures, but sought confirmation. CBMA said it is not aware of any PCB contamination incidents from such use and, " . . . The unlikely event of capacitor leakage is promptly evident by electrical malfunction or is otherwise visually detectable." The association also stated: "Since PCB liquid impregnants cost approximately 10 times as much as the mineral oil which they replaced, many attempts have been made without success to find other less expensive insulating liquids with the desirable characteristics of PCBs."

General Electric Company said a number of roles of PCBs in electrical apparatus cannot be adequately performed by substitutes and listed "compressor systems of air conditioning units, the ballasts of fluorescent lighting, phase-splitting and power-factor correction for electrical motors, filtering of electronic power supplies and others."

The company called for a distinction between "equipment or machinery which is in physical contact with the feed (or packaging material, or food) on the one hand; and, on the other hand, associated power supplies, control equipment or auxiliary equipment which is not in contact with the material it is desired to protect."

Aerovox Corporation emphasized that a mishap with capacitors "would be readily identifiable by the malfunction of the light, the visual presence of the liquid and/or the distinctive odor of the PCB, and proper corrective action could be implemented."

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Seven companies continued a strong protest from the packaging industry on the PCB proposal. Virtually all of the companies noted the current difficulty of on-line testing for PCB content in packaging. Comments arrived at FDA from:

Stone Container Corp.; Boxboard Research and Development Association; Lowe Paper Company; Fibreboard Corp.; Anaconda Aluminum Co.; Brown Company, and Milprint.

The Boxboard Association noted that its review of PCB incidents has shown that "in all cases, either PCBs with over 50% chlorine or non-domestic material with possibly highly toxic impurities were involved." The Association continued:

"There appears to be increasing evidence that the lower chlorinated compounds (Aroclor) 1242 and 1248 are partially or totally broken down by ultraviolet light and bacterial action since they are not found in the atmosphere, in soil or in water. They also do not appear to be cumulative since they are not found in animal, bird or human lipid tissue. Long term feeding studies do not indicate that the lower chlorinated PCBs have any harmful effects on warm blooded animals even at extreme feed levels."

The Fibreboard Corporation suggested that if FDA "is convinced that an interim maximum PCB for food packaging is required," then the agency should set a 15 p.p.m. level, which would "adequately protect the nation's health and would also permit continued production and use of recycled paperboard without violation of the law."

Anaconda Aluminum asked for an additional 90 days of comment on the proposal. Brown Company said: "An unenforceable law, or a law that is not fairly enforceable, is a burden and an embarrassment to the government and can be an economic catastrophe to our recycling industry and those who work in it."

DEFINITION OF "SERVING" SOUGHT IN NUTRITIONAL LABELING

Quality Bakers of America has called for an "immediate decision" on a definition for a serving or portion size for bread.

In a comment on the Food and Drug Administration's nutritional labeling proposal, the firm said present labeling is based on eight slices of bread. QBA asked if a serving would be: "... a single slice, or ... two slices, because sandwiches are made up of two slices, or ... four slices, because that may be a daily intake? Furthermore, are we talking about thin slices, ultra-thin slices, regular slices, or thick slices?"

American Bakers Cooperative also asked what the definition was for an average serving of white enriched bread.