

January 9, 1936

Dr. E. E. Ware
The Sherwin-Williams Company
Cleveland, Ohio

Dear Dr. Ware:

I greatly appreciate your letter of January 2, and I understand your attitude. I do not know what can be done along the lines that you suggest--i.e., to convince the Food and Drug Administration that they should conduct the investigation of lead toxicity under the guidance of a committee, chosen to represent the experiment stations, federal horticulturists, manufacturers, and fruit growers, as well as the Food and Drug Administration itself. I agree with you that prejudices would be checked at the door. I am certain that the fruit growing industry would have that attitude if it were allowed representation.

My interview with Dr. Campbell and Mr. Phillip's opinion of him have made me sure, however, that any investigation that they conduct will have as its sole purpose the ascertainment of facts. On the other hand, I can easily see that, if it is conducted without the representation of interests other than enforcement officials, it will be open to the criticism that you have in mind--that its supposed purpose will be "to get ammunition".

Also, it is certainly true that this investigation can be planned in such a way that it will be fundamentally (scientifically) satisfactory or unsatisfactory to all interests and that the only way to insure satisfactory planning is to have all interests represented. For example, the lead arsenate on washed apples is probably much less toxic than acid lead arsenate, because of the weathering that has taken place on the fruit, which tends to transform it to basic lead arsenate, and because the washing process probably removes the particles that are most easily dissolved. Therefore, washed apples should be used as one source of lead arsenate. A toxicologist or biochemist not experienced in horticulture would overlook this point. He might even imagine that he would be more scientific if he were to use pure acid lead arsenate because it is undecomposed and uncontaminated. He might think, also, that he could get the purest lead arsenate from a chemical supply house. There are probably a number of important points of that sort. Most important of all, perhaps, is the point that field investigations should constitute an important part of the investigation, by which I mean an examination of consumers for evidences of lead poisoning. I think, as you do, that representatives of the various interests

Dr. L. E. Ware

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would participate in a perfectly fair way; presumably, also, the best companies, horticulturists, fruit growers, etc., could help the Food and Drug Administration actively after the facts were established.

I have attempted to state the situation as you see it in my own words. As far as I know, my statement is complete, and the argument is absolutely sound.

The arguments for conducting a separate investigation at the Kettering Laboratory can be stated very briefly by saying that it would be exactly that kind of an investigation except for the cooperation of the Food and Drug Administration in planning and conducting the work, that a laboratory is miraculously at hand for doing the work, that most of the expense and effort would therefore be obviated because we would not have to work from the ground up, that the results of the experiment would be acceptable to the Food and Drug Administration, as well as to other interests, and last, but not least, that we would not have to ask the Food and Drug Administration to adopt a policy with which they are not already in sympathy.

I would be assuming entirely too much if I were to say, as the result of my brief interview with Dr. Campbell, that I have expressed his final attitude. As I told you, I think that he is anxious for all the help that he can get in arriving at the truth.

Yours very truly,

W. A. Rath

Chief in Hemological
Physiology

WAX:W
Enc.

cc: Kraybill	Wair
Overley	Kehoe
Greene	Tickett
Howlett	Gourley
Talbert	Phillips

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C O P Y

THE SHERWIN-WILLIAMS CO.

Cleveland, Ohio

January 2, 1936

Dr. W. A. Ruth,
University of Illinois,
College of Agriculture,
Urbana, Illinois.

Dear Dr. Ruth:

I thank you for your letter of the 26th enclosing copies of your paper, "The Spray Residue Situation".

Mr. Gunderson and I have discussed the whole situation several times and both of us feel that a conference with you might result in a different understanding on our part.

I sincerely wish there could be some neutral ground on which producers, consumers, and federal agencies could get together. We could all agree to check our personal prejudices at the door along with our hats and discuss matters of mutual interest from the standpoint of public welfare. Why should it be necessary for Dr. Campbell to conduct semi-secret investigations, apparently to get ammunition with which to combat industry if it should attempt to promote sale of a product that in his opinion is inimical to the public interest? Why couldn't such governmental investigations be conducted under the guidance of a committee, membership to be chosen from the U.S. Department of Agriculture and Experiment Station staff, Growers' Association membership, and manufacturing industry. One might even consider the advisability of asking the Farm Chemurgic Council to cooperate.

It seems to me that we must concentrate on the problem of promoting a better understanding and mutual respect between Federal Research and Regulatory Bureaus on the one hand and agricultural and industrial organizations on the other. There must be some Moses who can lead us out of the wilderness of misunderstanding.

Very truly yours,

THE SHERWIN-WILLIAMS COMPANY

E. E. Ware (signed)
E. E. WARE

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