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As previously indicated, the Food and Drug Administration and now EPA are studying this situation very carefully, and is considering the characteristics of the material, extent of use, and so on. I am certain that FDA will pursue this matter seriously. I must point out that 2,4,5-T has been a victim of a panic-button operation--but I am not certain to have heard the end of this one. I would hope that industry would pursue this matter intently and intensively. Furthermore, the Office of Science and Technology has been studying 2,4,5-T very carefully and deliberately, and will, I hope, very soon issue its report. According to news reports, the OST report is available and now some officials are having second thoughts about the hasty action taken when the use of 2,4,5-T was so restricted. In any event, I would bank on the judgment of OST on this one for it has studied the matter carefully and deliberately. In banning 2,4,5-T, I should like to point out that neither FDA nor SPAC were involved in the decision and for this I am glad, for I think the action taken was a serious mistake.

A rather interesting aspect of this chemical is that there has never been a tolerance established for it, and it was only used for certain field crops including sugar cane. It will, on the other hand, be permitted for use along the highways for the control of poison oak, but not in home gardens or near water sheds, field crops such as sugar cane, barley, oats, rye and so on.

One of the people of the Interagency group involved in making the decision to ban this chemical indicated that it is dangerous for women of childbearing age to inhale the chemical for it is a teratogenic material. I cannot refrain from raising the question as to whether or not a woman of childbearing age would be more apt to be exposed to the chemical along highways, or in areas where field crops or sugar cane may be grown, even if one takes into consideration their private lives. In line with this, one scientist made a rather interesting calculation. I should like to tell you about it. If a 130 lb. woman was lying naked on her back in a field being aerially sprayed with 2 lbs. of 2,4,5-T per acre she would receive the oral equivalent of only 1/190th of the no effect level based on animal tests. If she were 100 feet down wind, her exposure would be only 1/38000th of the no effect level. The degree to which these assumptions represent an extreme population is indicated by the fact that pregnant women are rarely engaged in activities relating to field spraying and that such spraying is highly uncommon when workers are in the field.

Our Recommendation number 8 stated: "Seek modification of the Delaney Clause to permit the Secretary of the Department of Health, Education, and Welfare to determine when evidence of carcinogenesis justifies restrictive action concerning food containing analytically detectable traces of chemicals." While I see a real need for this change, I doubt whether it is politically