In preparing this paper, I had occasion to review the recently published "Study of State and Local Food and Drug Programs", a report to the Commissioner of the Food and Drug Administration, United States Department of Health, Education and Welfare. This is an impressive and timely study. Packed into its relatively few pages is an analysis of a large part of the field of sanitation—comprehensive in scope, scholarly in approach, thorough in detail. The authors of this report fortunately chose not to limit the compass of their research to state and local programs which parallel those of the Federal Food and Drug Administration but they elected instead to cover all of the activities of state and local sanitation concerned with health and consumer protection.

While not prepared to endorse all of the recommendations of this report without reservation, I think that it would be of value to offer a condensation of the summary and recommendations contained in this work as a frame of reference for discussion. Please keep in mind that the term "food and drug" as used throughout is intended to cover all of the activities concerned with health and economic protection at the state and local level. The condensation follows.

**Summary of Findings**

As our society advances in science and technology, becoming increasingly complex in size and scope, protection of the populace against environmental hazards becomes proportionately difficult for government and industry. Increases in size and breadth of interest of industry, ever directed toward larger markets of regional and national dimensions, call for government to adopt a unified approach to health and consumer protection programs in place of fragmentation of effort which leads to duplication, confusion, conflict and neglect. Federal, state and local authorities in food and drug programs largely overlap each other. They can complement and supplement one another's abilities, but interagency relationships have been characterized by varying degrees of success in cooperation and coordination. There is little basic uniformity in food and drug laws among the states nor adequate correspondence with federal legislation. State laws are generally not broad enough to cover consumer risks. Laws and regulations do not coincide. In general, state and local food and drug laws are a disjointed mass. While industry has achieved unity in organization and operations, there is no corresponding unity in health and economic protection. Rather there is competitive rivalry and duplication of responsibilities with confusing results in government health and economic protection programs.

Commitment of resources by state and local government is large in total but uneven in quality and size. They are often not based upon objective and comprehensive assessment or requirements. Many agencies are characterized by deficiencies in one or more of the elements necessary for an efficient and competent organization. Statutory inadequacies, fragmentation of administrative authority, differences in the personnel environment, and in the level of financial support, and lack of coordination are examples of these shortcomings. If state and local government agencies are to retain their broad responsibilities in health and economic protection programs, there must be improvement in the quality and range of resources available, and the efficiency of application must be improved.

In view of the foregoing, there is a need at all governmental levels to continually evaluate the total task, to bring about some basic uniformity of policy, practice and approach and also fully coordinated cooperation. This requires a balanced partnership of federal and state governments with consequent acceptance of a realistic formulation of their respective roles. On the federal level there must be sufficient authority to carry out the leadership role. On the state level improvements in statutory base, management, and in coordination of state-local efforts is necessary. The assistance of industry is also needed in certain of these areas.

This concludes the findings. We will now go on to a synopsis of the more general recommendations contained in the report.

**Summary of Recommendations**

The interdependency and community of purpose among federal, state and local agencies should be expanded and further coordinated through a balanced federal-state partnership in which respective respon-
sibilities are clearly delineated. The states should assume a broader and more meaningful role in food and feed regulation with emphasis on preventive compliance through public education and cooperation with industry.

A delineation of responsibilities in specific areas should be made. This recommendation is made with some detail in the report. The federal government should exercise more productive leadership in the coordinated use of total public resources for health and consumer protection. Much broader interagency coordination is needed through a cohesive federal policy and administration. In order to accomplish this, a balanced view should be sought and maintained by all of those having responsibilities in these fields at the federal level. Such a balanced view should then be communicated to the states without the narrowness caused by limited interests.

There should be an enlargement of federal assistance to state and local regulatory agencies to complement local agencies resources and upgrade their capabilities, to finance special projects, to improve administrative and technical practices, to recognize present contributions and to support better federal-state-local coordination. On the state level a broad appraisal of programs should be made with a view toward improvement. Consumer protection activities including legal bases should be evaluated for breadth of coverage and balance to assure that they are geared to present day needs and for uniformity with other states and consistency with federal legislation among other qualifications.

A variety of recommendations follow which call for improvements, delineation of responsibilities and coordination, balance in programs and efficient use of resources in and between the several areas of interest on the state and local levels. With regard to personnel, an effectively operative merit system, improved career opportunities and training, and pay commensurate with contributions is advocated.

A call is made to industry to work for a more unified and effective system of governmental food and drug operations. Officials and their associations should expand both their formal and informal activities in attacking major problem areas of food and drug programs.

Finally, states working together under inter-state agreements can provide facilities and program function that would not be feasible for them to do while working alone.

This concludes my resume' of the summary of findings and recommendations. It does not do justice to the report, and it can in no way replace careful reading of the study in its entirety. The salient features of the report have been presented only as a basis for further comment.

THE CHALLENGE TO PUT OUR HOUSE IN ORDER

This study presents a challenge to all of us who are associated with any of the areas to which it has devoted attention. There are those who may believe that their houses are in relatively good order and are not overly concerned. Others among us may feel that the shoe fits too well and that many of the shortcomings noted apply to our jurisdictions. I believe that we can all profit by an analysis of our organizations and operations in the light of this report. Certainly we can all do more to improve relationships with other agencies in the same field at our own or at different levels of government.

Perhaps this report has struck me with particular force because it sums up so cogently a great number of the issues which we have been thinking about, reading about and talking about for a number of years. Surely, you have been concerned, as I have, with the proliferation of problems in the field of sanitation because of the rapid changes which are taking place all around us. We all recognize the handicaps with which governmental agencies are faced in keeping up with shifting socio-economic patterns. Industry is and must be free to make innovations in products and in methods and distribution, overnight so to speak, if it is to survive in a strongly competitive environment. Government, on the other hand, should also be free to adjust to changing conditions. But it is fettered by rigidities established by law, tradition, by public opinion or rather the lack of it in most cases.

We work within this structure and attempt to keep up with the need for maintaining a healthy environment lacking proper statutory authority, without an adequate budget, unsupported by a concerned and knowledgeable public. Nevertheless we continue to try. Judging by the status of sanitation today compared to that which existed a hundred, fifty or even twenty years ago, we have done very well considering the barriers to progress which had to be surmounted in the process.

Over the past ten years or so, I am sure that I have read scores of articles and listened to a number of speakers, all pointing out the things which needed to be done to meet present and future needs in the field of sanitation. The trouble is that most of these failed to offer realistic solutions to the difficulties involved in achieving reasonably swift progress in governmental jurisdictions.

THE VALUE OF GOOD COMMUNICATIONS

Those among you who have been associated with governmental sanitation programs know that there is no panacea for these problems. Hard work is still the only reliable means of moving ahead in any of
the areas which have been called to our attention. Perhaps you will agree, however, with a conclusion I have reached after some years of observation—that particular emphasis on one thing can multiply the value of all of our efforts in other areas. I refer to communications—the key to progress.

Within the organization, the quality of the flow of information back and forth between the several levels and the various units is an important factor in the effectiveness of the agency. The inspector in the field should know not only what he is doing but why he is doing it. Every member of the team should know the goal as well as his role. Any increase in the quality of information outward from the center usually means an increase in the quality of the information which is returned. Full information, in perspective, from the field is a valuable tool in making effective use of the human and material resources available in the regulation of sanitation problems. Good lines of communications are also necessary for adaptability in meeting new or changing situations effectively.

In a situation where overlapping of responsibilities and duplication of effort are major criticisms, good communications between agencies can help to bring order out of chaos. A unified approach by two or more organizations is only possible where a free exchange of ideas and information is taking place. Granted, that formal organizational setups which clearly establish jurisdictional lines are preferable to informal substitutes. However, while we wait for such permanent demarcations, we must rely on informal arrangements and agreements to eliminate conflict. This kind of cooperation is achieved through good lines of communication kept in good repair. I couldn’t ask for better communications than those which exist between the Connecticut Department of Agriculture and Natural Resources, the State Health Department and the Department of Consumer Protection. I attribute the almost complete lack of jurisdictional difficulties between our agencies to the excellent rapport which is maintained by good lines of communications which have been built up over the years.

The kind of communication which we maintain with industries under regulation is a key factor, to my way of thinking, in our efforts at securing compliance from them. The advanced status of self-inspection and intra-industry regulations owes much to the efforts of regulatory agencies over the years in selling the idea that good practice is good business. The free flow of information in both directions between industry and the regulatory agency helps at the inspection level to develop preventive compliance through mutual understanding. At the policy making level, it assists in the formulation of programs which are effective and capable of implementation with a maximum of cooperation on the part of industry.

Good communications between professional associations is a requisite if they are to pull together toward agreed upon goals. In this respect the Sanitarians Joint Council is doing a fine job of providing the mechanism for coordinating the activities of the four organizations with which sanitarians are affiliated. It is important for sanitarians to present a united front in order to gain general acceptance of the goals of the several associations.

PUBLIC EDUCATION IS VITAL

The areas which I have mentioned so far are but necessary forerunners to the most important of these—communication with the public. It is in this province that the greatest need exists and where the greatest gains can be made. People are much more aware and knowledgeable about sanitation today than they have ever been. They are more careful in their choice of products; they are reading labels and they are looking for inspection stamps and grades. On the other hand, we know that most consumers are laboring under the delusion that all foods, drugs and devices, and indeed, most environmental hazards are in some way regulated by government for their protection. Failure to educate the public as to the extent and degree of inspection or other protective measures can lead to massive popular reactions which we have witnessed in the cranberry and broiler incidents, for example, in the not too distant past.

We have a continuing obligation to try to reach the public with full information on incipient problems to stop these scare reactions before they start. The late Rachel Carson’s “Silent Spring” has, in retrospect, achieved much that is good in the regulation of pesticides. However, serious consideration should be given as to whether the end justifies the means in such instances. Too many improvements in sanitation and in other fields as well have been realized by the public alarm technique. We should be able to reach the people with more facts and less emotion. I can recall reading well written, comprehensive articles about the growing problem of pesticide control five or six years before “Silent Spring” was published. At least one of these was carried in the Journal of Milk and Food Technology. I submit that it is better to try to secure desirable action through calm and rational appeals through all of the channels of communication which are open to us, although it may take longer to get results.

There is a need for every sanitarian to devote at least a portion of his time to public education. Sanitation is a way of life—not just for the sanitarian—for everyone. The principles of sanitation must be brought home to the people in terms that they will
understand. The goal should be a positive public attitude toward sanitation in which every citizen knows and accepts his role in maintaining a clean environment. And we should hammer away to sell the concept that failure to provide tax dollars for necessary sanitation programs and facilities does not save money—it costs money.

When the people are made aware of the dimensions of the sanitation hazards in their environment and the steps which must be taken to correct or to prevent them, many of the problems outlined in the Food and Drug Report become much less difficult to solve. An unconcerned legislature is no match for a well-informed public that knows what it wants. This is the best way to secure improvements in the legal bases of health and economic protection, to provide the funds for these programs and the funds to pay the professional sanitarian at a rate commensurate with his responsibilities and his contributions. The success of this approach in the field of education, with the dramatic improvements which it has brought in prestige and level of living to the teaching profession, should encourage us to adopt a more vigorous and perhaps better coordinated program in the area of sanitation.

In the final analysis, the difficulties which face us today are, in perspective, really no harder to solve than were the difficulties of yesterday. If the problems are greater and more complex today, so the resources which we have available to solve them are also more abundant and more sophisticated. As we have met such challenges without losing stride in the past, I have every confidence we will meet those of the present and of the future.

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**PUBLICATIONS OF INTEREST**

Editorial Note: Listed below are books, pamphlets and reprints on a variety of subjects considered to be of interest. Request for material should be addressed to the source indicated. Note cost of books and certain items.


Water in Industry. Nat. Assoc. of Manufacturers, 2 E. 48th St., New York, N. Y. 10017 $2.00


Clean Waters for Ohio. Summer Ed. 1965. Ohio Water Pollution Bd. 450 E. Town St. Columbus, O. 43216


Functions of Phosphates in Food Products. Stauffer Chemical Co. 380 Madison Ave., New York, N. Y. 10017


Freeze-Drying Booklet. With sketches and diagrams. FMC Corp., Freeze-Dry Dept., P. O. Box 580, Santa Clara, Calif. 95052

Microwave Processing Systems for Industry. Raytheon Co., Waltham, Mass. 02154


PHSP-546. The Vending of Food and Beverages—1965. 15c

PHSP-861. Municipal Water Facilities—Communities of 25,000 and over. 1964.


