

on the type of results that we saw he was getting from the drug. I also felt that the studies were not thorough or real studies.

Mr. NICHOLSON: Dr. Morrell, in one or two of the regulations, in at least one, C.01.307, the expression "qualified investigator" appears. Now, it is not uncommon in legislation to see a term such as magistrate, or police officer, but when you put an adjective to determine whether a person is qualified or not, you cannot ask a judge to do it. Surely, the use of the term "qualified investigator" implies something when it appears in the regulations.

Dr. MORRELL: It is a good question. It is one that we have often debated: What is a qualified investigator for a particular job? If a drug is reputed to be useful in the treatment of cancer, for example, I think a qualified investigator dealing with the drug would be a man who is specializing perhaps in internal medicine.

He would certainly have to have the services of a pathologist. He would have to know definitely whether the tumour was malignant or whether it was not. In other words, he would have to diagnose whether it was cancer and what type of cancer it was. He would have to be a man with experience and with the facilities to measure any improvement in the condition of the patient. There are many things that he would have to have at his disposal as well as experience and knowledge to be what we would consider a qualified investigator. I would suppose if it was a question of a drug that is going to be recommended for the treatment of, let us say arthritis or rheumatism, the qualified investigator would best be one who is associated with the clinic that makes a specialty of the study of rheumatic diseases and who has all the facilities at his disposal to measure the improvement and to diagnose the illness so as to be sure he is starting out with something that is really rheumatism, to discover, what type of rheumatism, and one who has all the facilities necessary to measure improvement if there is improvement.

Mr. NICHOLSON: In view of what you said, do you not think then the definition of qualified investigator should be written either into the act or into the regulations?

Dr. MORRELL: We are going to try to do it.

Mr. NICHOLSON: Would it not be better to have it written in, in spite of the difficulties?

Dr. MORRELL: But if something came up suddenly that was not there, we would have to run to the minister to get an amendment.

Mr. NICHOLSON: Would you not agree that that would be better than having a general term of this nature?

Dr. MORRELL: It would make it easier to administer.

Mr. ORLIKOW: It seems to me that this is an extremely important point because unless the department has the authority either through the regulations or just through practices, to exert a very large extent of influence, if not control, on what is proper investigation, then it seems to me that the only other alternative, in order to get protection for the public, is to write into the law the actual controls. This is what they seem to be doing in the United States, and many competent doctors feel they are going too far. However, it does seem to me that, difficult as it may be, this is essential. One competent investigator suggested to me that people doing the initial investigation should be full-time people working in a hospital or in a research set-up, and that really part-time people, in the initial stages at least, are not either qualified or not directly enough concerned to do the adequate testing which is required. Yet, he seemed to indicate in his letter that on occasion testing has been done in companies by part-time people who just are not qualified to do the initial testing at least.