

We remind you that PMAC has never said that the origin of a drug is necessarily indicative of its quality. We have stressed, however, that we can vouch for the integrity of PMAC member companies and their efforts to produce high quality products. As Dr. Chapman himself told your Committee: "The responsibility for the quality, efficacy, and safety of a drug must rest with the manufacturer."

Dr. Chapman in his testimony has told the Committee that drugs imported from abroad are not all of satisfactory manufacture: "Continued vigilance by the Food and Drug Directorate in the area of drug importation is imperative, for we found that there are many European companies who do not have proper production facilities and, applying merely patent specifications, fail to achieve the same accuracy and precision of analytical quality control as the original manufacturer." (p.p. 7-8 of "Some Observations on Drug Control in Europe"—presented to the Committee on January 26)

Dr. Chapman has pointed out the very dangers we have emphasized and the awesome problems of policing imports.

Our contention that manufacturers with the proper motivation to produce top quality drug products will do so better than those who are in the market for a quick profit by cutting corners was amply confirmed by Dr. Chapman in his written statement of January 31, 1967.

Much testimony before your Committee indicates that some persons tend to minimize the importance of proper formulation apparently under the impression that as long as the proper quantity of the active ingredient is present in the drug product, the therapeutic action will necessarily follow. This conclusion of course is scientifically unsound. The art of pharmaceutical formulation is one of the most valuable assets of the pharmaceutical manufacturer.

PMAC does not contend more than the fact that it is possible to put some highly unsatisfactory drugs on the Canadian market today if a manufacturer or importer wants a quick profit and does not care too much for his reputation.

This is confirmed by Dr. Chapman in his statement to the Committee on January 26: (pages 3 and 10), wherein he points out that "it would require many times the present resources of the directorate to conduct limited tests on each lot of drugs to confirm compliance with label claims alone."

The situation is complicated by the fact that Food and Drug Directorate does not know the country of origin of the basic ingredients used in the manufacture of drug products as evidenced by an answer given by the Honorable A. J. MacEachen, Minister of National Health and Welfare, to a question by Dr. Isabelle (*Hansard*, Feb. 15, p. 13067).

It is our belief that Dr. Chapman's testimony is not in conflict with PMAC testimony, but rather is subject to widespread misunderstanding and misinterpretation.