Letters

Larvadex and the EPA

Eliot Marshall, in his article "EPA regulators take on the Delaney clause" (News and Comment, 25 May, p. 851), discusses the views of John Moore, assistant administrator of the Environmental Protection Agency's (EPA's) Office of Pesticide and Toxic Substances, in the following way: "Although Moore recognizes that Larvadex is a carcinogen at high doses for male rats, he thinks this finding has little meaning for human health."

Clearly, Larvadex is *not* an animal carcinogen. The EPA's proposal to register this product (*1*) states that "long-term feeding studies in which cyromazine was administered to animals did not demonstrate any evidence of oncogenicity." (Cyromazine is the active ingredient in Larvadex.)

The EPA's concern about oncogenicity in this matter relates to melamine, a metabolite of cyromazine, which did result in tumors of the bladders of some male rats fed daily amounts of melamine more than 20,000 times higher than would ever be present in poultry or eggs. The EPA said in the same proposal that the Food and Drug Administration Cancer Assessment Committee "found that melamine is only indirectly responsible for this occurrence in that stones occurred in the bladder only at high melamine doses and it is the stones, not melamine, that are tumorigenic" (*1*, p. 18121). Despite the committee's conclusion, the EPA is, as a precautionary measure, treating melamine as a carcinogen because of a *remote* possibility that the chemical per se may have caused the bladder neoplasms in the male rats. We believe current research demonstrates that the chemical is not oncogenic.

The article also refers to California as "one of a score of states where Ciba-Geigy has been pushing to have Larvadex registered for use on an emergency basis." Ciba-Geigy does not "push" states to request emergency exemptions for use of its products. This is a matter of company policy known to all of our employees who deal with state agencies. Our involvement has been to provide, when asked, a state with product-related information to help support an emergency request. The actual request procedure is a matter between a state's pesticide lead agency and the EPA. I do not believe that California or any other state could substantiate that Ciba-Geigy has pressured any official to seek an emergency exemption for any of our products.

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References

1. *Fed. Regist.* **49**, 18120 (27 April 1983).

Defense R&D

In a recent editorial (25 May, p. 821), William D. Carey warns that the research component of the defense budget—the 6.1 category—is particularly vulnerable when cuts in spending must be apportioned. He asserts this is so both because the development part—the 6.2 dollars—of R&D are so much larger than the research dollars but also because the damage done by cuts in the technology base is not felt until several years have passed.

Because the Army also recognizes the value and the vulnerability of its 6.1 program, it has made protecting its research investment a high priority as we make our case with Congress. While we do not know the final 1985 figures, our progress so far is encouraging to those interested in adequate funds for research. The latest indication is that Congress will fully fund the amount requested in the President's budget ($238.8 million). We have experienced no cuts in the Army's 6.1 program thus far. For comparison, the fiscal year 1984 figure is $217.5 million; thus in 1985 we may see growth of 9.8 percent in the Army's research program.

The proper role for the Army Science Board in this process has been assuring Army management that we have constructed and are operating the best and most credible 6.1 program. This, which is but one continuing activity of the Army Science Board, is what I hope Carey meant when he called for advisory board participation in the budget process.

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Government Research Policy

Jeffrey L. Fox's article about the retirement of Julius Axelrod (News and Comment, 1 June, p. 966) raises a number of important issues in the areas of research policy. A major concern expressed in the article is that scientists at the National Institutes of Health, as well as other federal scientists, do not have the same "rights as academics for consulting." I was somewhat disturbed that this serious concern was cast in terms of "entitlement."

Two related issues are of even more fundamental concern. One is whether the federal salary schedule, constrained at the upper end by congressional salaries, is adequate to attract and retain the best scientific capacity. The evidence of erosion of capacity in the federal science agencies is pervasive. The solution must be sought in a salary structure that is more attractive to both beginning and senior scientists. If Congress persists in undervaluing the services of its own members, other ways must be sought to correct the problem—perhaps through a Federal Scientific Service with an independent salary structure—if the erosion is to be reversed.

A second concern is the degree of complementarity or competition between consulting and research productivity. Consultation by federal as well as other scientists with industry should be encouraged. But an attempt should be made to structure incentives to avoid consulting that is competitive rather than complementary with research, scientific communication, or technology transfer. An adequate salary structure is a necessary complement to the development of a policy on consulting that would encourage collaboration among industry, university, and government scientists while avoiding a situation in which financial benefits would dominate consulting decisions. This is an issue which the academic community continues to struggle with, not always successfully. But