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THE WHITE HOUSE INFORMATION
WASHINGTON

March 27, 1975

MEMORANDUM FOR THE PRESIDENT
FROM: JIM CANNON
SUBJECT: Animal Feed Contamination in Michigan

Cattle and other animals have been contaminated with a flame retardant, polybrominated biphenyl (PBB), and as a result, HEW and Michigan authorities have had to destroy 11,000 head of cattle. In addition, 5,500 head are about to be destroyed, and another 37,000 head are in jeopardy if Federal authorities tighten down the Food and Drug Administration standards. Such a change by FDA is a distinct possibility because the contamination is very toxic and may cause adverse health effects in humans. The following table contains rough figures but should provide some perspective:

| | |
|--|-----------------------|
| Total Michigan milk cows | 423,000 |
| Destroyed or about to be | 16,500 (4% of total) |
| Will be affected if FDA changes PPB levels | 37,000 (9% of total) |
| Total cows affected with FDA change | 53,500 (13% of total) |

Cap Weinberger's memo (attached) points out the impact on other animals and the Agriculture Department advises us that the beef cattle industry in Michigan is also affected on about the same order of magnitude as the dairy cattle.

The impact on these industries in Michigan is extremely serious and would be made far worse if FDA lowers the tolerance levels. In addition, there could be a "panic" action by supermarkets and consumers. There is already some talk of major stores refusing to buy any Michigan milk.

The livestock contamination is limited to the State of Michigan. The contaminated feed was manufactured and distributed in that State. We will track this issue very closely with Cap Weinberger, Agriculture and other departments, and keep you informed.



THE SECRETARY OF HEALTH, EDUCATION, AND WELFARE
WASHINGTON, D. C. 20201

March 18, 1975

MEMORANDUM FOR THE PRESIDENT

SUBJECT: Animal Feed Contamination in Michigan; the FDA's
Responsibilities

RK
In October of 1973, adverse effects in cattle were observed in several dairy herds in the State of Michigan. At that time the cattle refused to eat manufactured feed; milk production decreased; there was a loss in body weight; and the cattle developed abnormal hoof growth with lameness. Cattle and swine aborted, and farmers reported the inability to breed heifers after they consumed feed manufactured by Farm Bureau Services. A herd of some 100 head of cattle sent to slaughter during this period exhibited enlarged livers.

Initially thought to be contaminated with lead or an insecticide, the manufactured feed was later found to be contaminated with a flame retardant, polybrominated biphenyl (PBB).

Investigation of the suspected feed revealed that one of the ingredients is a feed supplement, magnesium oxide, which had been purchased by the feed manufacturer from the Michigan Chemical Company. Additional investigation revealed that the Michigan Chemical Company manufactured two products very similar in physical appearance. One product, the magnesium oxide, is sold under the label Nutrimaster, while the other product, the PBB is sold under the label Firemaster. At the time that the problems first developed, both of these products were bagged in 50 lb. brown paper bags with either the name Firemaster or Nutrimaster stencilled across the top of the bag. When the bags were torn open the label was removed. No other name or identification appeared on the bags.

Some 318 tons of feed were manufactured using what was supposed to be the Nutrimaster. When problems appeared with this run of dairy feed, the company recalled some of it and mixed it with a new production run. This new run was then widely distributed throughout the State of Michigan. The problem of contaminated herds, which to that time had a somewhat limited distribution, is now several-fold in magnitude. At the present time, the Michigan Department of Agriculture reports that 11,000 head of cattle have been destroyed and buried. There are some 5,500 head of cattle presently

WHITE HOUSE
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under quarantine and ready to be destroyed and buried. The Michigan Department of Agriculture is aware of 286 herds numbering 37,000 head of cattle which have PBB levels within the present levels permitted by FDA. These 286 herds represent only those herds that the Michigan Department of Agriculture is aware of. How many more herds there might be is unknown.

In November of 1974, FDA lowered the PBB tolerance to 0.3 parts per million (PPM) in meat and milk fat, and 0.05 PPM in whole eggs. That is, eggs, meat, milk, etc. cannot be sold if PBB is found at or above that level. The source animals cannot therefore be kept alive because of the cost of feeding. To date, about 18,000 cows, 1.5 million chickens, 3,500 pigs, 1,200 sheep, 3,000 pheasants, and 4.5 million eggs have been destroyed, according to Michigan newspaper reports and our own figures.

About 11.5 million dollars have been paid out in insurance claims, and no more coverage is available.

PBB levels are being reported in humans who have eaten PBB-containing food. The toxicological significance of these levels is uncertain, but the findings are very bothersome. PBBs are very toxic.

The question of a further lowering of the tolerance must be faced. We are now in the process of determining how low we could go with a verifiable method of analysis. It is beginning to look as if we could go to 0.05 PPM in meat and milk fat, and 0.01 in whole eggs. This could very well destroy the industry in Michigan.

There are now reports of cows sick at levels lower than our tolerance. Several reports are now in papers that humans with PBB in their blood are experiencing symptoms similar to PCB poisoning. To date, the Michigan Department of Public Health has not been able to confirm any adverse health effects in farm families exposed to PBB contamination, though members of those families have positive PBB blood levels.

We are presently determining whether the risk to human health requires lowering the FDA tolerance level, and how much. A decision will have to be reached in several days. I will keep you informed.


Secretary