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INDUSTRY CONSIDERATION AND APPROACH

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It is always difficult to follow learned people who are now presenting material that can be scientifically quantified. When you begin to consider the other aspects in the development of avicides, you get into areas that are very difficult to discuss in terms that are meaningful to scientists and to businessmen alike.

Many people are quite concerned and interested in the development of new avicides and in the continuation of existing ones. I think there are certain directions that the public at large expects industry and government to go in regards to control operations, pollution, and so forth. One of the things I think we need to concern ourselves with is the fact that several biologically-oriented control mechanisms in control programs have been overlooked, sometimes intentionally. In the future, registration and regulatory groups are going to show more interest and a more amenable attitude toward biologically-oriented control programs, mechanism, and materials. Certainly there are many problems involved with the development of these programs and some of them are not going to be at all practical.

Some of the problems that are going to be involved within biologically-oriented control are more severe and more difficult to solve than are those problems connected with acute poisons. Nevertheless, I think the public is going to insist and demand that more research go in this direction. There will be continued research on acute poisons, but it will be downgraded; and, I am not too sure, but that an industry that has an interest in developing and entering the field of avicides should consider the attitude of the public in the development of their research.

Research costs are up. This is a necessary adjunct to improved scientific methods. Conservationists know more about what they need in terms of safeguards for the environment. Food and Drug people know more about what they need in terms of information on residues and translocation of residues into plant tissues and related items. Industry is much more sophisticated than it was ten years ago in the application of bird management techniques; so it is inevitable that the cost of research and the development of new materials has increased.

We also need to touch base with the public that we all serve. I am thinking now of some companies that have entered the field of avicides; these companies are now defunct because they failed to take into account public acceptance of their newly proposed technologies. A technology has to have public acceptance or there is very

little point in trying to market it. We need to keep in tune with the effect of the preaching we have done and the effect that that preaching has had upon the public. Some of these public attitudes have not been beneficial to anybody, and in some cases we have actually created problems for ourselves. For instance, in trying to preserve our fish and wildlife environment from the problems associated with DDT, the first unfavorable comment we received was a notice in the papers all over the State of Michigan that the best way to get rid of DDT was to dump it down the commode. This type of reaction must be anticipated when we begin to approach the public, particularly through mass media. We must try to develop in them attitudes that we feel, whether we are governmentally or business-oriented, are the best for the public.

You know, there is a prevailing philosophy in political science and governmentally-oriented educational institutions that government and industry have gotten so large that we need to tell the public what they should want and expect from us. There is some fallacy in this in that it doesn't always work that way. The public still has a way of reacting in the way that it suits "them", not necessarily in the way it suits "us". Public acceptance of new technology is important, and that means that some companies are going to have to spend as much time in marketing research and the developing of a market as they are in actually working with the chemicals, or the materials, or the methods that they would like to employ for profit. Basically, as far as the applicators industry is concerned, we have to concern ourselves with the public's willingness to pay for the end of research. No matter how safe your material or method is that you might develop, no matter how highly it might be counted by the scientific community or by associated groups, if it has a price tag on it that the public won't pay, it will fall flat on its face. Now if that sounds a little bit like I am injecting pragmatism into this discussion that is exactly what I am doing.

A puristic approach to the business of the development of avicides is an ivory tower approach that cannot exist. We all need to understand and appreciate the attitudes and concerns of people who are in other areas. The scientist needs to understand and appreciate the manufacturer; the manufacturer must know his market of applicators; and the applicator must know and understand the prevailing philosophy and attitudes of the conservation agencies that represent another segment of the public.

In this relationship, competitive marketing comes into the picture. If you develop chemical X that can be applied by methods 1, 2, and 3, how does that particular material compare to other materials already on the market? Manufacturers know this, but for some reason in the field of avicides this has been ignored; probably because the field is new, exciting, and has relatively few experienced people in it. But competitive marketing is very definitely a part of our economy and this is also something that must be considered avicide developers.

Related to that is the adaptability of methods. If you present a method which has one narrow use, the chance of that method getting into successful competition and developing enough money to even pay for itself is almost nil. These things are truly pragmatic, but nevertheless we cannot ignore them whether we be government or industry, if we are going to do a successful job of solving bird problems.

It should be pretty obvious to you from the two previous speakers that we are going to find an increasing reliance upon government agencies, both state and federal, in the development of avicides. I am not saying that this is good or bad, but I think it is going to happen. We need materials and new methods, and yet at the same time it is hard to ask a chemical company to put up four or five million dollars for the development of the material that won't pay for itself in the next one hundred and fifty years. And yet we have done this in many instances. So if we are requiring new materials and methods that have absolutely no possibility for relationship to the profit motive we are going to have to increasingly depend on government agencies.

There is one thing that I think all of us in industry are concerned about in this, and that is that tax supported research paid for by the public and industry must not lead to government-subsidized monopolies. There has been an increasing tendency in the field of avicides and rodenticides to go in this direction. It opens up certain companies and certain individuals to the possibility of anti-trust actions. I think we should avoid the appearance, as the Bible says, of evil. It isn't good business to take public money and allow it to appear that we are setting someone up in business and preventing competition from entering the field, in the name of efficacy or safety or anything else.

Now, it might seem that I've got a bone stuck in my throat for regulatory agencies and this is not the case. But I don't think we are going to gain anything by pretending that we do not have problems in the field of avicide or pesticide registration. We have problems. They are severe. I don't want to deal with specifics but in generalities; I think it is fair to discuss certain aspects. There is certainly a lack of coordination among the federal agencies that have to deal and do with the registration of pesticides. This lack of coordination can be at times severe. Certainly part of it is the result of bureaucracy that can be expected in any government as large as ours. Part of it is the result of untrained, unskilled individuals occupying narrow job descriptions without regard to the consideration of other interests, people, and fields. I can say some of these things because, after fifteen years of experience with the Fish and Wildlife Service, which is a fine organization, I can nevertheless see that there are some problems in lack of coordination. This isn't all bad. There must be some people that hold up one end of the public interest spectrum and other people that hold up another end. But all in all, some time, some place, there must be room for men to sit down, men of good will, to create the necessary concerns and considerations that we must have to intelligently develop avicides or any other pesticide for that matter.

In all fairness to the Pesticide Registration Division of USDA, these people have, for the most part, done an admirable job of protecting the federal interest, the public interest, the conservation interests, and other things. Certainly, at times they have been at odds with various groups and people. But to try to put together the concerns of conservationists, of Food and Drug residue specialists, of industry, of the public, and all of the multiplicity of influences that come in; to try to put these together and to reach an acceptable solution is a gargantuan task, and yet these people do it regularly. But in the field of avicides I have an idea that the task is going to become exceedingly more difficult for them than it is right now. We in industry are quite concerned that the total governmental effort not be along

one line of thought but be coordinated and activated toward the public interest and not toward the interest of bureaucracy.

One of the problems that this sort of thing is leading to is more state registration without regard to federal registration. I don't know that this is going to help the problem. It may on a temporary basis provide relief within a region or state. But it doesn't solve the problem of the lack of coordination, and this is a problem which we as adult individuals need to face head on and think about. We need to realize that we do have problems because we have a diversity of interests and we need to develop the necessary good will to work with one another. Otherwise it is not going to be workable. The move to place some of these agencies within one large agency which can have the overall control of all of the activities in relation to pesticides, that is, development and control of these groups by the Environmental Protection Agency, is one proposal. I don't know very much about this. In fact I am afraid that many don't. But if this becomes an actuality, and various agencies relating to pesticides are put into one large pot, that isn't necessarily going to solve this problem because you are still dealing with the same individuals and the same basic philosophies, and the same basic controversies with which the agencies, now separate, are concerned.

In the proliferation of state registrations I am afraid we are actually undoing in some instances what the FIFRA was intended to do and the intent of Congress. State registrations may be necessary and may be required in some instances because of localized need.

The last thing I would like to point out here is that the ability to regulate or to registrate requires unusual experience and competence which is not generally available in this field. There are very few chemists that can identify birds properly. There are very few ornithologists that know anything at all about toxicology except what they read in a textbook. Now that doesn't mean that either one of these groups are ignorant individuals, but it does mean that their area of enlightenment and their area of understanding is narrow. We need to take the blinders off our minds, begin to open ourselves up, and be a little bit more concerned about the other fellow's concern.

One last item and that involves research data. We have too much research data that is still lacking, and I mean basic research that should be done by our academic institutions and by related groups. There are too many holes in the whole bird physiology picture—many things we just don't know. And I am afraid that sometimes because of the pressure to know we pretend to be experts and we substitute conjecture for scientific methods. I don't think that is good for any of us whether we be in industry, government, or academic institutions. If I have created a little bit of irritation in your mind, that was purely intentional, because we are not going to get anywhere with this problem until we begin to face it head-on.