

A Tribute to William H. Goodrich: Legal Counsel Extraordinaire

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On March 10, 1998, the Food and Drug community lost one of its most respected and admired attorneys, William H. Goodrich. A remarkable man in both his public and private life, Goodrich pursued legal and administrative strategies which extended the reach of the 1938 Food, Drug, and Cosmetic Act and its amendments far beyond the literal wording of the statute.

During his years as Assistant General Counsel (now known as Chief Counsel) of the Food and Drug Division from 1952 to 1971, the Division was extraordinarily successful in its legal endeavors. A former FDA colleague recalls that Goodrich used to quip during these years that there were only three kinds of food and drug law cases: ones the agency won; ones on appeal; and ones decided incorrectly. A student in one of his famous food and drug law classes at New York University, an attorney from a large pharmaceutical company, was once quoted as saying, "Now I know how the Indian boy must have felt during a Western." Goodrich himself described the FDA during that period as a "can do" organization, willing to take on new consumer issues avoided by other agencies.

Goodrich came to Washington at age 23, after he had graduated from the University of Texas Law School and had spent a year in private practice. According to his son, he secured quarters when he arrived in 1939 in the old Dodge hotel downtown where both Lyndon Johnson and John Connelly were also among the Washington newcomers. Goodrich went to work in the Solicitor's office of the USDA, which was implementing the 1938 Food, Drug, and Cosmetic Act. Goodrich began by working with the newly created Federal Register to implement and publish administrative procedures under the new law. By 1940, he was transferred to the Food and Drug Division full time and assigned to help implement the food standards provisions of the 1938 Act. When the agency established standards for enriched flours and cereals, the decision was appealed by Quaker Oats all the way to the Supreme Court, by the agency's strategy was upheld.

Goodrich gained legislative experience working with the Insulin Amendment, the Durham-Humphrey Amendment in 1951, the Oleomargarine Act of 1950, and the Factory Inspection Amendment of 1953. His most cherished accomplishments, however, came during the 1960's in anticipating, drafting, and implementing changes in the new drug approval process, strengthening drug labeling regulations for all drugs, and later in fighting against false and misleading drug advertising. In 1970, he helped win an important appellate court ruling that paved the way for regulations defining "adequate and well controlled" drug testing.

The FDA History Office is now collecting papers, reminiscences, and anecdotes about Mr. Goodrich and his career to add to our files and to share with Mr. Goodrich's family.