DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

The Honorable John D. Dingell
Chairman
Committee on Energy and Commerce
House of Representatives
Washington, D.C. 20515-6115

JUN 0 5 2007

Dear Mr. Chairman:

Thank you for the letter of April 18, 2007, co-signed by three of your colleagues, regarding the human health consequences of antibiotics administered to farm animals. In your letter, you ask for clarification on the use of the Guidance for Industry: "Evaluating the Safety of Antimicrobial New Animal Drugs with Regard to Their Microbiological Effects on Bacteria of Human Health Concern" (Guidance 152) by the Food and Drug Administration (FDA) to evaluate new antimicrobial drug products and the potential for antimicrobial resistance.

First, we would like to emphasize that because Guidance 152 is a guidance document, its purpose is to provide nonbinding recommendations to industry on an approach for evaluating antimicrobial drugs as part of the new animal drug approval process. The final decision regarding the safety of an antimicrobial drug is not driven solely by Guidance 152. Pursuant to the Federal Food, Drug, and Cosmetic Act, FDA's decision on whether to approve a new animal drug application is driven by factors that include 1) whether such application included adequate tests to determine whether or not the drug is safe, 2) whether the results of such tests show the drug is unsafe or do not show the drug to be safe, or 3) whether, based on information either in the application or otherwise available to FDA, there is sufficient information to determine that the drug is safe.

FDA recognizes that foodborne human exposure to antimicrobial resistant bacteria is complex and often involves contributions from other sources of exposure, for example, direct contact between animals and humans, introduction of resistant bacteria and resistance determinants into the environment. However, FDA believes that evaluating antimicrobial new animal drug safety relative to the most significant exposure pathway, such as the foodborne pathway, is the best way to qualitatively assess the risk of antimicrobial drug use in food-producing animals. Nonetheless, as stated in Guidance 152, non-foodborne bacteria may be considered when deemed necessary. For example, uncertainties regarding the contribution of other exposure pathways may be considered during the development of appropriate risk management strategies.

In developing criteria for ranking antimicrobial drugs with regard to their importance in human medicine, FDA considered a broad range of issues associated with the efficacy of drugs in human medicine and factors influencing the development of antimicrobial resistance. Specific factors include the usefulness of the drug in foodborne infections, the types of infections treated, the availability of alternative therapies, the uniqueness of the mechanism of action, and the ease with which resistance develops and is transferred between organisms.

As you note in your letter, the World Health Organization (WHO) has also developed a system for ranking antimicrobial drugs with regard to their importance to human medicine. However, the WHO approach differs somewhat than the approach adopted by FDA. WHO determines the critical nature of an antimicrobial drug based on its use as the sole therapy or as one of a few alternatives to treat serious human disease, and on its use to treat diseases caused by organisms that may be transmitted via non-human sources or diseases caused by organisms that may acquire resistance genes from non-human sources. WHO also must consider the presence of diseases found in other parts of the world that may not be present in the United States.

As mentioned previously, FDA believes that human consumption of animal-derived foods represents the most significant pathway for human exposure to antimicrobial resistant bacteria that have emerged or been selected as a consequence of antimicrobial drug use in animals. FDA uses all of the scientific information available in making decisions on approvals. Guidance 152 provides a framework to organize the information used in making that scientific determination. FDA believes that framework is sound and has no immediate plans to revise Guidance 152.

Thank you again for contacting us concerning this matter. If you have any further questions or concerns, please let us know. A similar response has been sent to the co-signers of your letter.

Sincerely,

Stephen R. Mason
Acting Assistant Commissioner
for Legislation