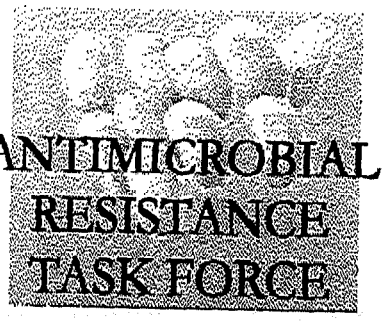

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

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Dear Sirs/Madams,

Over 30 years ago the Swann commission wrote a seminal report urging against the use of antibiotics from human medicine for growth promotion in livestock. After that report was issued the United Kingdom restricted the most prevalent human antibiotics from animal feed. A few years later the U.S. FDA commissioned a similar panel to assess this question. At that time most microbiologists felt that using the same antibiotics in people and animals was not wise, but there was only indirect justification for supporting restrictions. Even without direct evidence, the FDA proposed eliminating the use of penicillin and two other common antibiotics as subtherapeutic growth promoters. Unfortunately, the agricultural industry persuaded Congress not to pursue restrictions. Currently, in the United States roughly 50% of the antibiotics consumed yearly is for agricultural use, primarily added to food as growth promoters.

Over the last 25 years, with the development of molecular epidemiology, good evidence has accumulated to link subtherapeutic use of antibiotics and the prevalence of resistant bacteria in treated livestock, the people working with these animals, and the community surrounding the farms where treatment occurs. This type of data has convinced Denmark, Finland and Sweden to eliminate the use of all antibiotics for growth promotion and the European Union has greatly restricted their use as well. These countries have also taken steps to limit unnecessary use of antibiotics for therapeutic treatment of livestock. The World Health Organization has also weighed in against using antibiotics for growth promotion in livestock.

In the U.S., the Food and Drug Administration is proposing to take the first steps to restrict the use of fluoroquinolones for treatment in food animals. While these drugs are not used for growth promotion, their extensive use for treatment of entire poultry flocks is correlated with a significant increase in fluoroquinolone resistant *Campylobacter coli* and *C. jejuni*. Both of these organisms are important sources of food-borne infections in the U.S. Recently, CDC has estimated that 76 million illness, 325,000 hospitalizations and 5,200 deaths/year in the U. S. are due to food-borne disease and fluoroquinolones (e.g., Ciprofloxacin) play a vital role in treatment of these infections. The dramatic increase in fluoroquinolone resistant pathogens will limit treatment options, particularly for immuno-compromised patients.

On Oct. 31, 2000 the FDA proposed withdrawing the approval of fluoroquinolones for treatment of food animals. Of the two manufacturers, Abbott Laboratories voluntarily agreed to stop production of its product. In contrast, Bayer Corporation did not and is submitting its case for continued marketing along with its request for a hearing.

We strongly support FDA's proposal to withdraw approval for the use of the antimicrobial drug enrofloxacin in poultry. Based on the evidence, we urge the FDA to take a strong position against the unnecessary use of important human antibiotics for animal production.

Sincerely,

The Antimicrobial Resistance Task Force, Pierce County, Washington

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