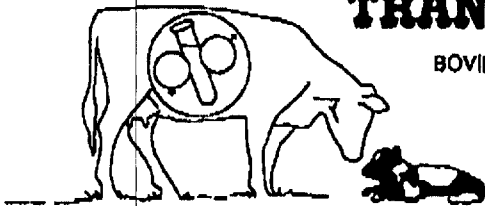


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April 20, 1999

Stephen Sundlof, PhD.
Center for Veterinary Medicine
7500 Standish Place
Rockville, ND 20855

Fax # 301-594-1830

Dear Dr. Sundlof:

I am writing to you directly because I would like to voice a comment on the proposed rules involving antibiotic use in animal agriculture which has not been voiced in the veterinary publications that I read. I think that it is accurate to state that the BIG problems in antibiotic resistance in human medicine have been the following:

1. Emergence of antibiotic resistant *Staph.* and *Pseudomonas spp.* in hospital patients.
2. Emergence of antibiotic resistant Tuberculosis in human patients.
3. Emergence of antibiotic resistant otitis in infants.

These are probably the three most widespread antibiotic resistance situations plaguing human medicine at the present time. I am suggesting that these situations result in the greatest danger to the greatest number of patients. Note that these major problems have developed within the human population. These problems are not the result of spread of resistance from veterinary patients. Note that the incidence of antibiotic resistance among veterinarians and agricultural personnel is no different than that of urban patients. Spread of antibiotic resistance from veterinary pathogens to human pathogens remains a potential problem, and should not be the major focus of regulation by the FDA.

My central concern is that the proposed restrictions on antibiotic use in veterinary medicine will be draconian for animal agriculture and will not be effective in stopping the increase in antibiotic resistance in human patients. Is this not an example of restrictions being applied to a minority segment of the population (farmers), rather than really addressing the tough problem of misuse of antibiotics by MD's and their patients? I can envision a proposal by the FDA in 2010 asking for the banning of ALL antibiotic use in animal agriculture because antibiotic resistance in human pathogens has continued to grow. I would oppose the CVM's proposals (which address potential sources of antibiotic resistance) unless we can be assured that the FDA is taking major steps in regulation of the use of antibiotics in human patients (which is, by far, the major cause of antibiotic resistance).

Sincerely,

George Holzner, DVM

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