



ECOLOGY CENTER
OF SOUTHERN CALIFORNIA

P. O. BOX 351419, LOS ANGELES, CA 90035-9119 • TELEPHONE (310) 559-9160

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January 21, 2001

Ms. Jane Henney, M.D., Commissioner
U.S. Food & Drug Administration
5600 Fishers Lane
Rockville, MD 20857-0001

Dear Dr. Henney,

We urge you to establish a reporting system to determine the quantity of antibiotics used in U.S. agriculture.

The rise in antibiotic resistance is slowly eliminating the effectiveness of these drugs for treating infectious diseases in people. While there is a growing acceptance of the causes of antibiotic resistance -- misuse in human medicine, overuse in agriculture and livestock, --there are few publicly available data on the quantity of antibiotics used in the U.S. Such data is necessary for scientists to explore the links between antibiotic use and the development of drug resistance and for developing national strategies to curb use.

The Union of Concerned Scientists attempted to address this lack of data by estimating antibiotic use in agriculture by calculating antibiotic use in three major livestock sectors using publicly available information on herd size, approved drug lists and dosages, and estimates on the percent of herds treated. That just released report, "Hogging It", estimated that a staggering 24.6 million pounds - roughly 70 percent of all antibiotic drugs - are fed to healthy cows, pigs, and chickens annually for nontherapeutic purposes such as growth promotion. By those calculations the amount and total share of antibiotics used in livestock dwarfs the 17.8 million pounds recently reported by industry for all agricultural use of antibiotics.

Although UCS's numbers are the best, most transparent estimate of agricultural antibiotic use available so far, we need government-guaranteed information for creating effective solutions for reducing antibiotic use. The Food & Drug Administration has recognized the need for collecting such information, but has not taken steps to establish a system to do so.

* Now is the time to establish such a system, and information should be collected for both human and agricultural use, and should include the class, indication, dosage, and treatment period. To delay is to run the risk of major infectious diseases sweeping across our country with no arsenal of effective medications left to combat the problem.

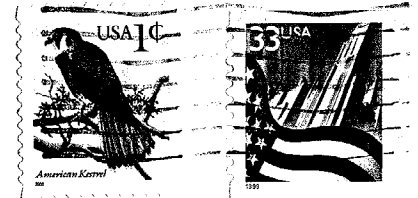
Sincerely,

Anna Harlowe
Anna Harlowe
Issues Coordinator

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Ecology Center Of
Southern California
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Los Angeles, CA 90035
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