

3 January 2000

Commissioner Jane Henney, M.D.
Food and Drug Administration
5600 Fishers Lane, Room 1471
Rockville, MD 20857

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Dear Commissioner Henney:

While the links between animal agriculture and human disease are complicated and in need of additional study, evidence is strong enough for scientists and public health organizations to call for reduced use of antimicrobial growth promoters in agriculture. The CDC has concluded that, in the United States, antimicrobial use in food animals is the dominant source of antibiotic resistance among food-borne pathogens.

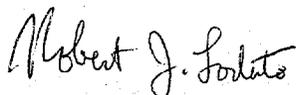
According to a 1998 National Research Council study, *The Use of Drugs in Food Animals: Benefits and Risks*, the reported incidence of bacteria-related food-borne illness is increasing. While some uses of antibiotics in livestock operations are a matter of animal health, other uses have an economic motive. Especially troubling is their use not to cure sick animals but to promote "feed efficiency," that is, to increase the animal's weight gain per unit of feed. This so-called subtherapeutic use translates into relatively cheap meat prices at the grocery store.

But is this economic motive an essential use of these drugs? The economic advantage appears to be minimal. The National Research Council study estimated that a ban on such subtherapeutic use in livestock would increase per capita costs between \$5 and \$10 per year. That is a price most people would willingly pay to preserve a robust arsenal of medicines against infectious disease.

In conclusion, overuse of antibiotics as growth promoters in livestock has been linked to the emergence of antibiotic-resistant diseases. Many of the drugs used to enhance growth in chickens, pigs, and cattle are the same as, or closely related to, those used to treat people. Fearing a rise in untreatable infectious diseases, the European Union has banned all growth-promoting uses of antibiotics used in human medicine.

Both the CDC and the World Health Organization have called for an end to the use for growth promotion in animals of those drugs that are used to treat human disease or that are related to such medicines. However, the Food and Drug Administration has taken no action against drugs currently in use. Instead, it has merely begun a series of meetings to discuss possible restrictions on new approvals of antibiotics. I urge you to follow the lead of the EU and move immediately to ban animal uses of growth-promoting antibiotics used in human medicine. Thank you.

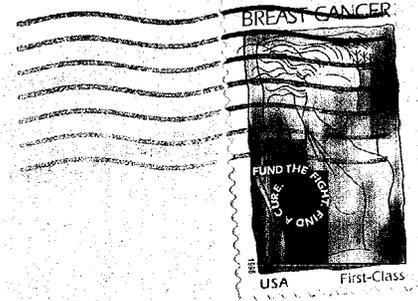
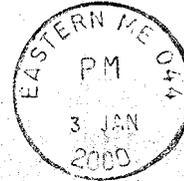
Sincerely,



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