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January 9, 2001

Jane E. Henney, M.D.
Commissioner
U. S. Food and Drug Administration
5600 fishers lane
Rockville, MD 20856-0001

Re: A National Antibiotic-Use Reporting System

Dear Dr. Henney,

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

The overuse of antibiotics in agriculture is contributing to the emergence of untreatable diseases in people. Reliable data on antibiotic use in agriculture is needed for an effective national strategy to reduce antibiotic use are unavailable.

The rise in antibiotic resistance is slowly eliminating the effectiveness of these drugs for treating infectious diseases in people. While the misuse of antibiotics in human medicine is the larger contributor to the problem, there is agreement among public health experts that the overuse of antibiotics in agriculture is also impacting human health by contributing to the rise in drug-resistant microorganisms.

But while there is growing acceptance of the causes of antibiotic resistance, there are few publicly available data on the quantity of antibiotics used in the United States - data that are necessary for scientists to explore the links between antibiotic use and the development of drug resistance and for developing rational strategies to curb use.

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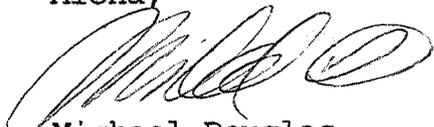
In the just released report *Hogging It!*, the Union of Concerned Scientists attempts to address this lack of data by estimating antibiotic use in U.S. agriculture. UCS calculated antibiotic use in the three major livestock sectors using publicly available information on herd size, approved drug lists and dosages, and estimates on the percent of herds treated.

The report estimates 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 our calculations the amount and total share of antibiotics used in livestock dwarf the 17.8 million pounds recently reported by industry for all agricultural use of antibiotics.

Although they were devised by an indirect method, UCS's numbers are the best, most transparent estimate of agricultural antibiotic use available. While they are good, they are not good enough. Government-guaranteed information on U.S. antibiotic use is necessary for creating effective solutions for reducing antibiotic use. The Food and Drug Administration has recognized the need for collecting such information, but it has not taken steps to establish the needed system.

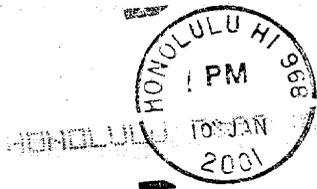
The FDA should move now to establish a system for collecting basic data on agricultural antibiotic use in the United States. The information should be collected for both human and agricultural use and should include the class, indication, dosage, and treatment period.

Aloha,

A handwritten signature in black ink, appearing to read "Michael Douglas", written in a cursive style.

Michael Douglas

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