

**Kathy Shea**

**From:** "Kathy Shea" <tkmjshea@mindspring.com>  
**To:** <execsec@oc.fda.gov>  
**Sent:** Wednesday, January 10, 2001 9:55 AM  
**Subject:** Non-Therapeutic Antibiotics in food animals  
Jane E. Henney, M.D.  
Commissioner  
U. S. Food and Drug Administration  
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Dear Dr. Henney,

As a physician, I'm sure you're as alarmed by the rising rates of resistant organisms causing treatment failures, increased morbidity and mortality in our patients and increased cost of all treatments. I am writing to urge you to study the new UCS report entitled "Hogging it! Estimates of Antimicrobial Abuse in Livestock". I read this after I just finished reading the Welton article "Antimicrobial Resistance in Enterococci Isolates from Turkey Flocks Fed Virginiamycin" (Antimicrobial Agents Chemotherapy (1998) 42(3):705-8) in which a careful investigation done in turkeys found isolates from the oldest flocks contained *E. faecium* with 100% resistance to quinupristin-dalfopristin (Synercid) in 1995-6, BEFORE it was available on the market for human use. The combination of the two reports was so alarming it has moved me to write this letter

My concern, which I'm sure all physicians share, is that even as the medical community is trying to crack down on misuse, overuse and abuse of antibiotics in clinical practice, we are doomed to failure because a potentially enormous selective force is being exerted in the agricultural bacterial pool un-noticed and un-checked. We know that human pathogens can become multi-drug resistant to crucial antibiotics due to agriculture use of antibiotics. We know that humans are exposed to these organisms via food, water, and occupationally and can and do get sick. We know bacteria are the original and indisputably the best genetic engineers on earth, capable of modifying their DNA in multiple ways. It seems inevitable that antibiotics used at low dose over long periods of time will cause problems which will ultimately show up in the clinic, the hospital and even the morgue.

I urge you to do whatever you can to gather the information necessary to document what seems logically obvious. We must have the data on where, when, which and how much of all antimicrobial agents are being used in agriculture. We must begin, using hard data, to evaluate the relative contributions of human medical, veterinary medical, and animal and plant agricultural use of these critical chemicals to the rising resistance rates. Without the data on use, we cannot reliably define the antecedents of the problem and any proposed solutions could be misdirected and waste time.

None of us want to find ourselves in the position of standing by the bedside of a young child dying of a bacterial infection that only a few years before antibiotics would have cured. Please keep that image foremost in the eyes of all the people who are attempting to define this problem. While an abundant and safe food supply is, of course, a sine qua non of a healthy long life, it cannot be bought at the price of effective antibiotics.

Thank you for your kind attention.

Sincerely,

***Katherine M. Shea MD***

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