



CARROLL'S TURKEYS LLC

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WARSAW, NORTH CAROLINA 28398

Dr. Lester Crawford
Acting Director
Food and Drug Administration
5600 Fischers Lane, Room 1471
Mail Stop HF-1
Rockville, Maryland 20857

Dear Dr. Crawford,

My name is Keith Shoemaker. I am currently President of Carroll's Turkeys with Murphy-Brown LLC in Warsaw, NC a division of Smithfield Foods. Additionally, I have worked for many years in the chicken industry as Vice President of Operations with Perdue Farms. My career in management in the poultry business spans over 20 years.

I write to express great concern regarding the process by which the Center for Veterinary Medicine (CVM) and the recent ALJ Initial Decision appear to be evaluating the evidence in the NOH proceeding to remove Baytril from the market in chickens and turkeys. Overall, I am concerned that CVM is attempting to "throw the baby out with the bath water" and may be making a substantial error relative to the best action for protecting public health as well as serving animal agriculture responsibly. This is especially true regarding issues specific to the turkey industry.

It is my understanding that the final decision on this matter will rest entirely in your hands. I therefore ask you to consider some important points in your review of this matter.

Firstly, we have no alternatives to Baytril. There are no products on the market that perform anywhere close to Baytril for reducing mortality in flocks with serious infections. In many cases we will simply have to stand by and watch animals die if Baytril is no longer available.

Secondly, since HACCP regulations were signed into law via the President's Food Safety Initiative in 1996 and implemented in large processing plants in 1997

poultry products have shown consistent improvements for generic E. coli and Salmonella prevalence. I am confident that this improvement applies to processed turkey as well as chicken products. Why then is CVM attempting to implicate poultry as an increasing risk of food borne disease?

Thirdly, although I am not familiar with all the evidence, I am aware that there is little or no evidence that demonstrates any risk of food borne disease coming from turkey meat. In such a circumstance it is incredible to me that CVM would attempt to remove such an effective product from the market.

Lastly, healthy animals produce safer food. CVM's current line of thinking seems to be that sending sick animals to processing will have no impact on the safety of the resulting food produced. I can absolutely assure you that this will not be the case. Sick animals challenge the processing system substantially and healthy animals allow it run very smoothly.

It's appears time for your office and oversight to inject some sound judgment into this process. I urge you to review this issue carefully and objectively as it has important ramifications for animal agriculture's future here in the United States. Use seasoned experts who can give this topic a fair day in court.

Thank you in advance for your consideration in this matter.

Respectfully Submitted,



Keith Shoemaker

Cc: Docket # 00N-1571