

AAAP

AMERICAN ASSOCIATION OF AVIAN PATHOLOGISTS

Charles L. Hofacre, Secretary-Treasurer of AAAP
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September 2, 2004

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

Dear Dr. Crawford,

The American Association of Avian Pathologists (AAAP) is a member organization of the American Veterinary Medical Association (AVMA). It meets annually in conjunction with the AVMA each summer, and is currently composed of 700 members representing all areas of avian specialty relating ultimately to the diagnosis, prevention and treatment of disease. Its membership is international, composed of avian veterinary practitioners and research scientists from diverse employment backgrounds: University faculty and research staff, state diagnostic laboratories, national research laboratories (USDA, FSIS, ARS), National Poultry Improvement Plan (NPIP), the broiler and turkey production industry, allied industries, and minor species industries (ducks, quail, etc.). The AAAP has many committees that give guidance and formulate positions for the AVMA on avian-specific issues (i.e., Animal Welfare Guidelines, Food Safety, Judicious Use of Antimicrobials), as well as formulating disease control policies for the AAAP (i.e., Avian influenza, Exotic Newcastle Disease control). The AAAP is governed by a Board of Directors that will, on occasion, and at the direction of the membership by vote, state the views of the organization on matters of a serious nature that impact the potential health of the National Poultry Flock.

As Secretary-Treasurer of the AAAP, I have been instructed by the Board of Directors to inform you of the concerns of the AAAP membership regarding the process of the NOH for Baytril (enrofloxacin), Docket #00N-1571, and the on-going review of the administrative law judge's Initial Decision. We have followed closely the scientific arguments as well as the legal ones since the NOOH was issued, and believe that Judge Davidson's ruling was not science-based, did not have a solid legal foundation, and inappropriately struck or ignored critical testimony by

2000N-1571

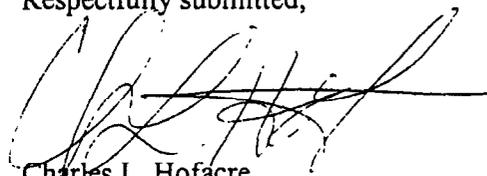
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expert witnesses, many of whom are AAAP members of high regard, including at least 2 past presidents. We believe that evidence presented during the NOB proceedings demonstrates that a healthy National Poultry Flock is essential to a safe food supply, that there are no effective available alternatives to enrofloxacin, and that the benefits derived from its use far out-weigh the risks. We consider the availability of enrofloxacin to be essential to the control of *E. coli* infections in chickens and *E. coli* and Pasteurella infections in turkeys, as a drug of last resort.

For these reasons the AAAP urges you to include a veterinarian on your review committee who has great depth of experience in the real world practice of poultry disease diagnosis and prevention and is well-grounded in the principles of Food Safety. Our organization believes that the important decision-making that lies before you will be well-served by such an appointment.

Respectfully submitted,



Charles L. Hofacre
Secretary-Treasurer, AAAP

CLH/sc

Cc:

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AAAP Board of Directors