



Department of Agriculture and Food

LEONARD M. BLACKHAM
Commissioner

01-07-04 03:24 PC/D

State of Utah

JON M. HUNTSMAN, JR.
Governor

June 1, 2005

GARY R. HERBERT
Lieutenant Governor

Dr. Lester M. Crawford, Acting Director
US Food & Drug Administration
5600 Fishers Lane, Room 1471
Mail Stop HF-1
Rockville, MD 20857

Dear Dr. Crawford,

I am writing to express both my concerns and those of my constituents over the recent attempts to remove or limit the use of FDA approved antibiotics in food animal industries. My concerns relate both to current regulatory activities and to legislative attempts to impact approved products. I understand that some concerns relate to the possible reduction of effectiveness of antibiotics for human use. However, animal based concerns are very small indeed when compared to the threat posed by over prescription of antibiotic compounds in the human medical community. This type of antibiotic use impacts the most serious human pathogens which can be readily transmitted within a hospital or community. The threat of animal or food borne infections continues on a steady decrease which began in 1997. Things are getting better not worse regarding animal origin risk.

Benefits, risks, and impacts should all be considered in evaluating animal antibiotic uses. I would like to point out three significant considerations. First, the cost of antibiotics today makes their usage very limited. Other than the growth promoting drugs, the treatment for disease antibiotics are so expensive that they are used only in extreme life threatening conditions for animals which greatly limits their usage. Second, we want healthy animals as our food sources. The conditions of animals that are forced to survive when challenged by disease are not the quality of meat that is beneficial for the public. I know that some claim this can be accomplished with management practices. This can help, but it does not prevent the occurrence of some diseases under the very best management practices. And third, the question of being humane with our animals needs to be considered. It is a very unpleasant situation to see animals that could be cured with an antibiotic, suffer and often die if an efficacious antibiotic treatment cannot be used.

I urge the department to be careful and judicious in weighing the issues. No product should be eliminated without the science that proves harm is being done to the human population. I am especially concerned with the consideration being given for the removal of Baytril. This drug is one of the few that is effective in the poultry industry and especially for turkeys. The number of drug choices for agriculture usage is very limited due to the huge cost of the approval process. I can assure you that

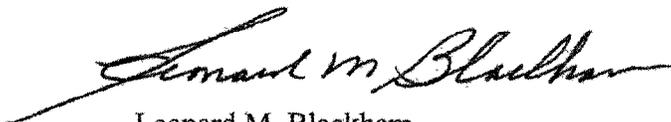
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Baytril is so expensive that it is not used unless it is absolutely necessary. It is frequently the only treatment that can allow a severely affected flock to recover prior to processing.

Sincerely,

A handwritten signature in black ink, appearing to read "Leonard M. Blackham". The signature is written in a cursive style with a long horizontal flourish extending to the left.

Leonard M. Blackham
Commissioner

cc: Michael O Leavitt, Secretary:
U.S. Dept of Health & Human Services
U.S. Food & Drug Administration:
Dockets Management Branch