



*The Quality Chicken People*

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March 18, 1999

Dr. Margaret Miller  
HFV-1, Room 482  
FDA, Center for Veterinary Medicine  
7500 Standish Place  
Rockville, MD 20855

Dear Dr. Miller:

I am writing to comment on the "Proposed Framework for Evaluation and Assuring the Human Safety of the Microbial Effects of Antimicrobial New Animal Drugs Intended for Use in Food Producing Animals."

I am not in favor of this proposal in that it will eliminate development of new drugs for use in animal agriculture. This proposal implies that all antibiotic resistance is due to the overuse of drugs in food animals. What about human pediatric medicine and non food producing animal usage?

Where is the scientific evidence published that definitively describes the cross resistance to antibiotics from animals to human beings? I don't think it exists. Are you folks yielding to pressure from CDC?

No one would think of assigning a higher priority to animal well being than human health, but this framework document seems hastily developed before scientific evidence proves this hypothesis to be fact. Can some compromise be reached to allow pharmaceutical companies to continue developing new drugs? What about animal welfare issues of not having appropriate drugs to relieve animal suffering?

Sincerely,

G. Thomas Holder, DVM  
Director of Avian Health

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