



NATIONAL CHICKEN COUNCIL

1015 FIFTEENTH STREET NW, SUITE 930
WASHINGTON, DC 20005-2605

PHONE: 202-296-2622
FAX: 202-293-4005

5 April, 1999

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

Dear Dr. Miller:

The National Chicken Council (NCC) is the national trade association representing the producer/processors of over 95 percent of the broiler/fryer chickens marketed in the United States. We appreciate this opportunity to comment on CVM's "Proposed Framework for Evaluating and Assuring the Human Safety of the Microbial Effects of Antimicrobial New Animal Drugs Intended for Use in Food-Producing Animals."

NCC's member companies fully share the concerns that have been expressed by the public, governmental agencies, and public health community regarding the broad issue of antimicrobial resistance. This, however, is a very complex issue, particularly with respect to the potential risk of antimicrobial resistance developing in food-producing animals with potential subsequent transfers to humans. Any decisions made with respect to approving new animal drugs or prohibiting their use must be supported by sound scientific evidence.

Although we applaud CVM's effort to address this issue, we believe the proposed "Framework" lacks a sound scientific basis and leaves too much to subjective judgement. Our specific concerns with the proposed "Framework" are delineated in the comments filed by the Animal Health Institute, the American Veterinary Medical Association, and the Association of Veterinarians in Broiler Production. We strongly urge CVM to give serious consideration to the issues raised in these comments.

Sincerely,

J. Stephen Pretanik
Director, Science & Technology

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