

Ames Hearing on Antibiotics, FDA Commissioner D. Kennedy, March 23, 1978

Dr. Elder:

As Chairman of the Committee on Drugs and Biologics of the American Association of Avian Pathologists (AAAP), I would like to express the deep concern of the entire Committee membership over the proposed restrictions on the use of antibiotics in poultry and animal feeds. (In this presentation I will limit myself to poultry feeds).

There is a limited number of poultry pathologists/diagnosticians in the U.S. who have a specialized expertise in the diagnosis, treatment and control of poultry diseases. Many of us are working in state or commercial diagnostic laboratories, and are in daily contact with the poultry producers in our area. Only a few are general practitioners, and not all poultry diagnosticians have a license to practice veterinary medicine in the states where they work. However, it is our unanimous opinion and experience, that the career poultry diagnosticians are very well qualified and experienced to diagnose and treat poultry diseases. Many of the local licensed practicing veterinarians seldom, if ever, deal with poultry, and in fact, have shown very little interest, so far, to do so.

The proposed regulations would take the effective treatment (both at the therapeutic and the preventive level) away from many of the poultry diagnosticians, which will seriously jeopardize the present effective level of disease control in our commercial poultry industry, and make it more costly, more cumbersome and much less effective.

As Committee members of the AAAP Drugs and Biologics Committee, we feel that the proposed regulation will be a serious setback and a change for the worse, with the commercial poultry industry as its chief victim.

We therefore urge you, Commissioner Kennedy, that you will make it possible, that the present situation will be retained, whereby the poultry diagnostician can advise and instigate poultry flock treatment with antibiotics, both at the preventive or therapeutic level, without prescription from a licensed veterinarian.

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of the American Assoc. of Avian Pathol.