



Robert J. Eckroade, Secretary-Treasurer of AAAP  
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July 10, 1997

Dr. Steve Sundlof, Director  
Center for Veterinary Medicine  
Food and Drug Administration  
7500 Standish Place  
Rockville, Md. 20855

Dear Dr. Sundlof:

This letter is concerning the prohibition of extra label use of fluoroquinolones in poultry. It is my understanding that the new proposal prohibits mycoplasmosis and salmonellosis from being legally treated with fluoroquinolones and pasteurella can no longer be treated with sarafloxacin.

If the continued use of these products is not allowed as they are presently permitted, the human food borne disease risk could increase, i.e., salmonellosis. In addition, minor species of poultry would not be allowed to use these drugs.

The poultry industry shares your concern regarding drug resistance. However, with ongoing monitoring for resistance and the use of the drugs by prescription only, it is highly unlikely that increased resistance will occur. The poultry industry is fully integrated and drug usage is tightly controlled by company veterinarians. The cost alone prohibits the indiscriminate use of these compounds.

The drug companies are not going to spend extra money to get expanded clearances. Where does this leave the poultry industry in treating susceptible diseases in minor species and mycoplasma, pasteurella and salmonella in chickens and turkeys?

The prescription use only and withdrawal times are well established by FDA and followed by the poultry industry. Even an extra notation could be made on the prescription detailing the exact usage.

Dr. Steve Sundlof

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As chairman of the Drugs and Therapeutics Committee of the American Association of Avian Pathologists, I am asking you to reconsider this very important issue. We need every advantage available to compete in the world animal protein market and deliver a product with minimal risk of causing human food borne illnesses.

Thank you for hearing us out and listening to our point of view. We look forward to hearing from you.

Sincerely,

A handwritten signature in dark ink, appearing to read "G. Thomas Holder", followed by a long horizontal flourish line extending to the right.

G. Thomas Holder, DVM  
Director of Avian Health  
ALLEN'S HATCHERY, INC.