



Robert J. Eckroade, Secretary-Treasurer of AAAP  
382 West Street Road, Kennett Square, PA 19348-1692  
Phone: (610) 444-4282; Fax: (610) 925-8106  
E-mail: AAAP@vet.upenn.edu  
August 7, 2001

Dr. Stephen Sundlof  
Director, Center for Veterinary Medicine  
Food and Drug Administration Mail Code HFV-1  
7500 Standish Place Rockville, MD 20855

Re: FDA Veterinarian, Jan-Feb, 2001

Dear Dr. Sundlof:

The American Association of Avian Pathologists is the professional organization of those veterinarians and scientists with an interest in diseases of avian species. As such, our membership includes the vast majority of those veterinarians responsible for the health management and antibiotic treatment of US poultry, as well as those with academic interests in avian diseases. We are acutely interested in the responsible use of antimicrobials in poultry, as evidenced by our representative's participation in the Steering Committee on Antibiotic Resistance. This participation resulted in the rapid development and dissemination of the "Guidelines for Judicious Therapeutic Use of Antimicrobials in Poultry", which basically articulated the current standard of practice in the poultry industry.

Consequently, we were distressed to note that page 2 of this issue contains the article "Antibiotic Resistance from Down on the Farm" by Linda Bren, as reprinted from the January/February 2001 issue of the FDA Consumer, which contains the statement "But the size of flocks precludes testing and treating individual chickens – so when a veterinarian diagnoses an infected bird, the farmers treat the whole flock by adding the drug to its drinking water." (underscores added). In practice, poultry veterinarians assemble information on a representative sampling of the house or flock, and then determine an economically viable course of action. The requirement for an economically viable course of action precludes use of antibiotics based on pathology in a single bird. In other words, flocks of birds are treated only when a significant number of birds are either clinically affected or are showing early signs of disease (i.e. ruffled feathers, nasal/ocular discharge, etc), thus preventing the rapid spread of the disease from 1 individual to the next until the entire flock becomes infected.

If it were FDA/CVM's belief that poultry veterinarians are treating flocks based on one sick bird, it would be our pleasure to host an on-farm visit by your staff and one of the members of our organization to verify the practice. On the other hand, if FDA/CVM does have information supporting that this practice, stated in the article by Linda Bren, is occurring, we would ask that this individual(s) be notified of the "Guidelines for Judicious Therapeutic Use of Poultry."

We request that FDA/CVM either retract this statement or schedule a meeting with us to discuss why you believe it to be true.

Sincerely,

Charles L. Holacre, DVM, MAM, PhD  
President, AAAP

Cc Hon. Tommy G. Thompson  
Dr. Bernard Schwetz  
Dr. Lyle Vogel