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Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Docket No. FDA-2010-D-0094 – Draft Guidance #209: The Judicious Use of Medically Important Antimicrobial Drugs in Food Producing Animals

Dear Sir or Madam:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863 and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, the AVMA is the recognized national voice for the veterinary profession. The association's more than 80,000 members comprise approximately 83% of U.S. veterinarians, all of whom are involved in a myriad of areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

The AVMA has carefully reviewed and thoughtfully evaluated the Food and Drug Administration's Draft Guidance #209: The Judicious Use of Medically Important Antimicrobial Drugs in Food Producing Animals and the key scientific reports summarized within the Guidance. We greatly appreciate the FDA's initiative in clearly conveying its current thinking to relevant stakeholders through the issuance of a draft guidance and allowing opportunity for public comment.

The AVMA agrees that in order to effectively respond to public health concerns associated with antimicrobial resistance, it is important to broadly consider how medically important antimicrobials are being used. These drugs must be used judiciously in both humans and animals. The AVMA has long been a proponent of judicious drug use by veterinarians, having historically worked with the FDA and other stakeholders to help develop principles and processes that foster the appropriate and judicious use of medically important antimicrobials. We believe that unnecessary or inappropriate antimicrobial use should be avoided.

The AVMA agrees that the wide availability of antimicrobial drugs in human and veterinary medicine has provided tremendous benefits to human and animal health for more than fifty years. We recognize that any use of these drugs can result in increasing selective pressures and loss of effectiveness, potentially posing a threat to human and animal health.

We assert that reducing the overall quantity of antimicrobials used is only one of the means by which to evaluate successes or improvements in judiciousness, since microbes respond differently to reductions in selection pressure. Because reduction in overall antimicrobial use may not necessarily provide a human health benefit, we must remain cognizant of potential detrimental consequences to animal health and welfare that might accompany a reduction in use. Therefore, we caution against overly broad limitations and recommend targeted interventions based on scientific quantitative risk assessments.

