

# TACD

TRANS ATLANTIC      DIALOGUE TRANSATLANTIQUE  
CONSUMER DIALOGUE      DES CONSOMMATEURS

David Byrne  
Commissioner for Health and Consumer Protection  
European Commission  
200, Rue de la Loi  
Brussels B-1049  
Belgium

7 November 2001

## **Re: Ban on use of fluoroquinolone antibiotics in poultry**

Dear Commissioner Byrne,

We wish to again advise the Commission of the (attached) position of the Trans Atlantic Consumer Dialogue (TACD) on the issue of the medically important class of antibiotics called fluoroquinolones. In the fall of 2000 the United States Food and Drug Administration (FDA) proposed a ban on the use of fluoroquinolones in poultry because of the risks to human health of such use, and in April 2001 the TACD adopted the following resolution:

TACD calls for a total ban on the use of fluoroquinolone antibiotics in poultry unless the drug is administered by injection.

A multiple-antibiotic-resistant strain of *Salmonella typhimurium* DT 104 has, for example, emerged in the UK that is resistant to ampicillin, chloramphenicol, streptomycin, sulfonamides, and tetracyclines -- antibiotics that are or were used commonly in animals. Before fluoroquinolones were approved for use in animals, DT 104 was not resistant to fluoroquinolones. Only two years after approval of fluoroquinolones for agriculture, fluoroquinolone resistance was found in 16 percent of the *Salmonella* DT 104 of farms. In 1996, fluoroquinolone-resistant *Salmonella* DT 104 caused an outbreak among people who ate turkey in a British restaurant. Thirteen people were sickened by the tainted birds, and one person died.

In February 2001 the Committee for Veterinary Medicinal Products (CVMP) of the European Agency for the Evaluation for Medicinal Products issued a report on fluoroquinolones, *Reflection by the CVMP within a European context on the intention of the FDA to withdraw the use of the fluoroquinolone enrofloxacin in poultry*. The CVMP clearly acknowledges that the use of fluoroquinolones in poultry results in antibiotic-resistant *Campylobacter* infections in people. However, the Committee minimizes the importance of antibiotic-resistant *Campylobacter* to human health, because most infections do not require antibiotic therapy. We are not convinced that the Committee has the ability to scientifically assess the impact of fluoroquinolone-resistant *Campylobacter* infections on human health. While the members of the CVMP panel have knowledge in the fields of veterinary medicine and veterinary drugs, they are not a public health committee.

Physicians, public health experts, and their organizations -- including the American Medical Association and the American Public Health Association -- judge fluoroquinolone-resistant *Campylobacter* to be an important public health issue and support the U.S. FDA's proposed ban. A November 21, 2000 letter from the American Medical Association and four other professional medical associations to Bayer Corporation CEO Helge H. Wehmeier said: "Although [U.S.] national data for human *Campylobacter* isolates was not collected until 1997, quinolone resistance levels were clearly low in the early 1990s; however, they soared to 12.9 percent in 1997 and 17.6 percent in 1999. Resistance has already started to compromise the therapeutic efficacy of ciprofloxacin in patients with *Campylobacter* infections." The letter urged Bayer to follow the example of Abbott Laboratories and voluntarily withdraw its fluoroquinolone in poultry. We urge you to likewise seek Bayer's voluntary withdrawal of all its fluoroquinolones from use in the poultry industry with the threat of a ban.

In conclusion, we again urge the Commission to ban the use of fluoroquinolones in poultry unless the drug is administered by injection.

Yours Sincerely,



Sue Davies  
EU Chair of the TACD Food Working Group



Bruce Silverglade  
US Chair of the TACD Food Working Group