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November 23, 2009

Joshua Sharfstein, MD
Deputy Commissioner
U.S. Food and Drug Administration
5600 Fishers Lane
Rockville MD 20857-0001

Dear Deputy Commissioner Sharfstein:

On behalf of Keep Antibiotics Working (KAW), I write you again to ask that you take quick action to respond to the growing crisis of antimicrobial resistance related to veterinary drug use in the United States. Specifically, KAW urges the FDA to prohibit the extralabel use of cephalosporin drugs in food producing animals, as it announced it would do last year. KAW is a coalition of health, consumer, agricultural, environmental, humane and other advocacy groups working to protect the efficacy of antibiotics in both human and veterinary medicine.

It has been over a year since the FDA decided to ban extralabel cephalosporin drug use in livestock due to the unacceptable public health risk it poses. In November of last year the FDA withdrew the ban soon before it was to take effect. FDA justified withdrawing the extralabel ban due to additional time needed to review comments. The docket shows that around 200 different comments on the rule were received. Using data from the Centers for Disease Control and Prevention (CDC), KAW estimates that there were over 68,000 people who became ill with cephalosporin resistant non-typhi *Salmonella* in the past year. This number includes over 18,000 children under the age of 5 who became ill with this type of *Salmonella*, or roughly 50 children a day during the

time FDA has spent reviewing the comments on the ban. KAW requests that FDA reissue the extralabel cephalosporin ban and not wait another day before acting.

We look forward to FDA's response to this important public health concern.

Sincerely,



Richard R. Wood
Chair, Keep Antibiotics Working Steering Committee