

October 31, 2000

Helge H. Wehmeier, President and CEO
The Bayer Corporation
100 Bayer Road
Pittsburgh, PA 15205-9741

Via fax - 412-778-4431

Dear Mr. Wehmeier:

The undersigned health, consumer, and other public-interest groups urge you to voluntarily to agree to withdrawal of approval to market Baytril®, a fluoroquinolone antibiotic for use in poultry, from the market. As you know, on October 31, 2000, the FDA took the first step in banning fluoroquinolones for use in poultry by publishing a Notice of Opportunity for Hearing. Bayer has 30 days to determine whether to request a hearing; if Bayer does not, the withdrawal automatically takes effect.

FDA's Notice sets forth detailed reasons for concern about continued use of fluoroquinolones in poultry, including the recent dramatic rise in fluoroquinolone resistance among humans. Although fluoroquinolones were approved for human use in 1986, resistance in foodborne bacteria such as *Campylobacter* and *Salmonella* remained extremely low until shortly after their use in poultry began in late 1995. As of 1998, human resistance levels were at 13.6%; as of 1999, at 17.6%. The trend is both unmistakable and unacceptable.

These trends are particularly troubling given the importance of fluoroquinolones in human medicine. Fluoroquinolones are the treatment of choice for some human intestinal illnesses, most particularly food poisoning caused by *Campylobacter* bacteria. *Campylobacter* is the most common cause of foodborne illness in the U.S. and can be life-threatening for persons with weakened immune systems such as the elderly, chemotherapy patients, and transplant patients. Fluoroquinolones are also important in treating other illnesses, including urinary tract infections, bone and joint infections, and some types of pneumonia.

The only other manufacturer of fluoroquinolones for poultry, Abbott Laboratories, has already requested withdrawal of approval for its product. We urge Bayer to do likewise without delay.

Very truly yours,

Mohammad N. Akhter, MD, MPH, Executive Director, American Public Health Association
Michael F. Jacobson, Ph.D., Executive Director, Center for Science in the Public Interest
The Rev. Jim Lewis, President, Delmarva Poultry Justice Alliance
Fred Krupp, Executive Director, Environmental Defense
Richard Wood, Executive Director, Food Animal Concerns Trust
Alice Slater, President, Global Resources Action Center for the Environment
Mark Ritchie, Executive Director, Institute for Agriculture and Trade Policy
Brother David Andrews, CSC, Executive Director, The National Catholic Rural Life Conference
Robert K. Musil, Ph.D., Executive Director, Physicians for Social Responsibility

Margaret Mellon, Ph.D., Food and Environment Program Director, Union of Concerned Scientists

Please direct your response to Karen Florini, Senior Attorney, Environmental Defense, 1875 Connecticut Ave., NW, Washington, DC, 20009, who will distribute it to other cosigners.