

October 18, 2010

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Secretary Vilsack:

As organizations committed to protecting patients, public health, animal health, and food safety, the undersigned groups are writing to express our serious concern about comments attributed to you on the subject of the judicious use of antibiotics in animal agriculture. These comments were reported to have been made at the 2010 legislative conference of the National Cattlemen's Beef Association:

"I've communicated to Rep. Slaughter, my support of the judicious use of antibiotics. The vast majority of producers do not abuse the use of antibiotics in livestock production. I told her you cannot ban this. It doesn't make sense. USDA's public position is, and always has been, that antibiotics need to be used judiciously and we believe they already are."

-- As quoted by www.cattlenetwork.com, 9/15/10

This statement is troubling for two important reasons.

First, as affirmed at a recent Congressional hearing by representatives of your Department, the Food and Drug Administration (FDA), and the Centers for Disease Control and Prevention (CDC), there is an abundance of scientific evidence that shows the present use of antibiotics in industrial farm animal production is a major driver in creating antibiotic-resistant bacteria that can cause human illnesses that are difficult or even impossible to treat. Dr. John Clifford, Deputy Administrator of the Animal and Plant Inspection Service's Veterinary Services program, supported this evidence during the House Health Subcommittee hearing on July 14, 2010, as did representatives from the FDA and CDC. We have attached to this letter citations to scientific studies demonstrating these concerns, for your reference.

Estimates that as much as 70% of the antimicrobials sold in the United States are being used non-therapeutically in livestock and poultry suggest there are serious structural problems in the industrial system of food animal production. The current judicious use guidelines advocated by the American Veterinary Medical Association and promoted by the FDA's Center for Veterinary Medicine state that before antibiotics are administered in a farm animal operation, producers and veterinarians should undertake production changes to mitigate the need for antibiotics. Those judicious use guidelines appear to be ignored often, and, as the USDA's January 2009 report, *The Transformation of U.S. Livestock Agriculture: Scale, Efficiency, and Risks*, acknowledges, non-therapeutic antibiotics are much more frequently relied on in the larger hog operations and less sanitary broiler chicken facilities. Furthermore, the 2009 USDA study concludes that there

is little to no economic benefit to producers when antibiotics are fed to increase growth, especially in finisher pigs and broilers. Industry guidelines should be rewritten to help preserve the effectiveness of antibiotics, while USDA works more effectively with producers to encourage alternative production techniques that can maintain animal health and economic productivity.

Second, your comments appear to contradict and confuse emerging FDA and USDA positions. As you know, the FDA recently accepted public comments on new draft guidance to industry regarding judicious use of antibiotics in livestock and poultry. While our organizations appreciate FDA's first steps to address this important public health issue, we have expressed our concerns that the agency could favor a weak, voluntary approach that may not result in sufficient change in antibiotic use. Over 180,000 individual letters were submitted to the agency expressing similar concerns. (Two organizational letters to FDA are enclosed as examples for your reference.) Given the significant public outcry for more responsible antibiotic use on the farm, as well as the unified scientific message delivered by the Obama Administration during the July House hearing, it is inaccurate to state that current agricultural antibiotic uses are judicious. Such a statement could be interpreted to signal to producers that no changes are necessary, which could negatively impact the progress being made at FDA to reduce antibiotic overuse. This statement also appears inconsistent with your Department's acknowledgement that antibiotic use in food animals affects human health.

Further, as USDA producer surveys have shown, large percentages of food animals are routinely being fed antibiotics non-therapeutically. Therefore, the claim that producers are following even their own voluntary guidelines is, unfortunately, largely unsubstantiated.

Our organizations concur with the body of scientific literature that concludes that antibiotic use in animal agriculture can and must be reduced dramatically in order to protect human health. We also recognize that by improving sanitation and husbandry, increasing veterinary involvement, and adopting alternative production techniques, U.S. producers can transition to a better system that is not only feasible and affordable, but also profitable and more humane. The USDA is ideally positioned to help producers make this transition.

We would appreciate the opportunity to meet with you on this important issue. To arrange a meeting, Shannon Heyck-Williams in The Pew Charitable Trusts' government relations department will contact your office, or she may be reached at sheyck-williams@pewtrusts.org or (202) 887-8801.

Thank you for your time and consideration.

Sincerely,

Alliance for the Prudent Use of Antibiotics (APUA)
American Academy of Pediatrics
Association for Professionals in Infection Control and Epidemiology, Inc. (APIC)
Consumers Union
Food Animal Concerns Trust

Food & Water Watch
Government Accountability Project
The Humane Society of the United States
Institute for Agriculture and Trade Policy
Keep Antibiotics Working
The National Consumers League
National Foundation for Infectious Diseases (NFID)
The Pew Charitable Trusts
Safe Tables Our Priority (S.T.O.P.)
Society of Infectious Diseases Pharmacists
Union of Concerned Scientists
Waterkeeper Alliance

Cc: Principal Deputy Commissioner Joshua M. Sharfstein, M.D., U.S. Food and Drug Administration