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July 12, 2010

The Honorable Betty Sutton  
U.S. House of Representatives  
Washington, D.C. 20515

Dear Congresswoman Sutton,

Please see below my comment to the U.S. Food and Drug Administration's (FDA) recent Advance Notice of Proposed Rulemaking (ANPR) on the agency's Veterinary Feed Directive (VFD) (ANPR-Docket No. FDA2010N0155).

This statement and FDA's proposed rule is relevant to the hearing planned for this week on industrial farm use of human antibiotics in the House Energy and Commerce Subcommittee on Health. Please submit this statement to the record and urge your colleagues to follow your lead in cosponsoring and working to adopt H.R. 1549 the Preservation of Antibiotics for Medical Treatment Act of 2009 (PAMTA).

Sincerely,

J. Kevin Sullivan, Executive Director  
Ohio AIDS Coalition

*RE: Veterinary Feed Directive; (Document ID FDA-2010-N-0155-0014)*

*I am writing in regard to the U.S. Food and Drug Administration's (FDA) recent Advance Notice of Proposed Rulemaking (ANPR) on the agency's Veterinary Feed Directive (VFD), ANPR-Docket No. FDA2010N0155. I fear that this rulemaking process could result in relaxed controls on veterinarian prescription practices related to antibiotic use in food animal production.*

*Antibiotic resistance is a looming human health crisis, as recognized by leading public health organizations. To address this crisis the public and private sectors must work together to reduce the overuse of antibiotics. However, it is estimated that up to 70 percent of all antibiotics sold in the U.S. are given to healthy food animals. The FDA must take action to protect human and animal health by establishing effective oversight to help prevent continued overuse of antibiotics in food animal production.*

*As an agency that advocates for the care and treatment of people living with HIV disease, the Ohio AIDS Coalition is concerned about any regulation changes that would adversely impact the immune systems of the HIV-positive community. The rise of drug-resistant bacteria, is a growing*

*human health threat to the HIV -positive community as well as the general public and we oppose any regulations that weaken already-lenient controls on the use of antibiotics in food animal production*

*The FDA created the VFD process to balance human health concerns with the need for a system that makes drugs available for prudent animal health uses. The December 2000 regulations state that veterinary supervision is critical to "reducing unnecessary use of such drugs in animals and to slowing or preventing any potential for the development of bacterial resistance to antimicrobial drugs." Since the VFD regulations were issued only two drugs have been approved, and there is no established evidence of any concerns or inefficiencies with the current VFD system. By contrast, there is overwhelming evidence that antibiotic resistance poses an even greater threat to human health than it did a decade ago.*

*It has been close to a year since FDA publicly stated that the routine use of antibiotics as growth promoters on industrial farms needs to be curbed. However, I am concerned that the recently-initiated rulemaking process contradicts this statement. In fact, I believe this rulemaking could make it easier for the routine use of antibiotics in food animal production to continue, and even increase.*

*I urge the FDA to take immediate action to reduce the amount of antibiotics in food animal production in a clear and transparent process.*

*Thank you for your attention to this matter and I look forward to FDA action in protecting human and animal health through a strong, prudent, and effective oversight system for antibiotic use in food animal production.*

*Sincerely,*

*J. Kevin Sullivan, Executive Director  
Ohio AIDS Coalition*