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Dr. Jack Shere, DVM, PhD  
Chief Veterinary Officer  
U.S. Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250

**RE: Notice of Request for Reinstatement of an Information Collection; National Animal Health Monitoring System; Goat 2019 Study [Docket No. APHIS-2018-0029]**

Dear Dr. Shere:

The Pew Charitable Trusts (Pew) strongly supports the U.S. Department of Agriculture (USDA)'s efforts to collect information on goat health, nutrition, management, antimicrobial stewardship, and antibiotic resistance patterns through the National Animal Health Monitoring System (NAHMS). Pew encourages the agency to commence the planned data collection as quickly as possible, to provide participation incentives in the form of free resistance and individual animal testing, and to include the use of vaccines and other antibiotic alternatives as well as antimicrobial use and resistance in the data collection effort.

Pew is an independent non-partisan research organization which applies a rigorous, analytical approach to improve public policy, inform the public and stimulate civic life. In our work on antibiotic resistance, we seek to reduce the inappropriate use of antibiotics in human healthcare and animal agriculture and to foster innovation in drug development.

Pew fully supports USDA's NAHMS program and makes the following recommendations to further strengthen the data collection efforts for the Goat 2019 study:

- **Commence the data collection efforts as quickly as possible.** USDA's NAHMS surveys are a unique, nationally representative data source on animal health and management as well as antibiotic stewardship practices, and offer valuable insights into the U.S. animal agricultural industries. The last NAHMS Goat study was conducted in 2009. Therefore, recent changes to industry practices, such as those brought about by full implementation of FDA's Guidance for Industry 213, which ended growth promotion uses of medically important antibiotics and placed remaining feed and water uses under veterinary oversight, are not reflected in the available data and new data collection efforts are needed to assess changes in and accurately capture industry practices.
- **Maximize voluntary participation through established incentives and explore other ways to create value for participating organizations.** Producer participation in the voluntary NAHMS surveys is vitally important to the program's success, and dependent on participants' recognition of the value provided by the program. As clearly outlined in the 'Needs Assessment Survey Results' for the Goat 2019

study, goat producers consistently ranked resistance testing of pathogens and individual animal testing as the top participation incentives. Collecting these data as part of the Goat 2019 study and reporting individual testing results back to the participating operation will provide value for producers, encourage their participation, and ultimately enhance the data collection efforts. In addition, the agency should continue to explore ways in which the collected data can provide value to participating organizations, for instance by allowing participants to benchmark their operations.

- **Collect data on the use of antimicrobial drugs and their alternatives as well resistance data.** As clearly outlined in the ‘Needs Assessment Survey Results’ for the Goat 2019 study, goat producers regard antimicrobial use and resistance as one of their key concerns. Data on the use of antimicrobial drugs and their alternatives as well as resistance data are foundational for the development and evaluation of stewardship practices to reduce the need for antibiotics, with the ultimate goal of containing the emergence of antimicrobial resistance. The collected data should be nationally representative, timely and reflective of current use practices, as well as detailed and specific. NAHMS surveys provide an important mechanism to collect these data, and Pew supports the efforts of USDA as well as FDA and CDC to improve and harmonize national data collection efforts in the United States and appreciates the various outreach efforts the agencies have engaged in to solicit stakeholder comments on this important topic.

Pew supports the NAHMS program as an important tool to collect information on animal health and antibiotic stewardship, appreciates the opportunity to comment on this important topic, and would value the opportunity for further dialogue.

Sincerely,



Karin Hoelzer, DVM, Ph.D.  
Senior Officer, Health Programs  
The Pew Charitable Trusts