

November 2, 2012

Margaret A. Hamburg, M.D.  
Commissioner  
U.S. Food and Drug Administration  
White Oak Building One  
10903 New Hampshire Avenue, Room 2217  
Silver Spring, MD 20993

Dear Commissioner Hamburg:

On behalf of the undersigned public health and consumer organizations, we wish to commend the U.S. Food and Drug Administration (FDA) for working with the U.S. Department of Agriculture (USDA) to plan a series of public stakeholder meetings across the country on ways to increase veterinary oversight of judicious antibiotic use in food animal production. We believe engaging large animal veterinarians and producers in such a dialogue is critical to achieving a smooth and successful transition to animal production methods that are less dependent on antibiotic use. However, we have not seen indication that these workshops will involve public health and consumer representation and urge the two agencies to ensure such participation.

As you know, misuse and overuse of medically important antibiotics in livestock and poultry is a significant contributing factor to antibiotic resistance in human pathogens. FDA has taken an important step by issuing Draft Guidance #213 to encourage drug makers to end the sale of antibiotics for production reasons (i.e., growth promotion and feed efficiency). Proposed changes to the Veterinary Feed Directive (VFD)—currently published in the form of draft pre-regulatory text—would partner with the guidance to achieve greater veterinary oversight of drugs that are today mainly used over-the-counter in farm animals. Expanding and modernizing the VFD will be a vital component to ensuring both the success of Guidance #213 in reducing on-farm antibiotic use and in protecting animal and public health.

Given that FDA's plan to combat antibiotic resistance and antibiotic overuse in food animal production greatly impacts human health, we urge the agencies to include the public health community in each aspect of its design and implementation, including stakeholder dialogue on the VFD. We also urge the agency to finalize Guidance 213 and issue a formal proposed rule regarding VFD changes by the end of 2012. Public health must begin to take precedence over short-term animal production concerns immediately if we are to successfully protect the efficacy of our antibiotics in treating deadly human—and animal—infections.

Thank you again for your leadership in stemming the growing epidemic of antibiotic resistance.

Sincerely,

Alliance for the Prudent Use of Antibiotics  
American College of Preventive Medicine  
American Public Health Association  
Center for Food Safety  
Center for Foodborne Illness Research & Prevention  
Consumers Union  
Food and Water Watch  
Keep Antibiotics Working  
Michigan Antibiotic Resistance Reduction Coalition  
National Consumers League  
Organic Consumers Association  
The Johns Hopkins Center for a Livable Future  
The Pew Charitable Trusts  
Trust for America's Health  
Union of Concerned Scientists

Cc: The Honorable Thomas Vilsack, Secretary, U.S. Department of Agriculture  
Michael R. Taylor, J.D., Deputy Commissioner for Foods  
Linda Tollefson, DVM, MPH, Associate Commissioner, Office of Foods  
Bernadette M. Dunham, DVM, PhD, Director, Center for Veterinary Medicine