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July 10, 2012

President Barack Obama  
1600 Pennsylvania Ave. NW  
Washington, DC 20500

and

The Honorable Margaret Hamburg, MD  
Commissioner, Food and Drug Administration  
10903 New Hampshire Avenue  
Silver Spring, MD 20993-0002

Dear President Obama and Commissioner Hamburg:

As recognized leaders in the U.S. scientific and medical community, we applaud the FDA's recent actions to promote judicious use of antibiotics in food-producing animals through recommendations, delineated in its guidance documents. We support your guidance that antibiotics not be used for growth promotion and feed efficiency, and that there be veterinary oversight in the dispensing of antibiotics—particularly in feed and water, where whole herds and flocks are the recipients. These voluntary guidances represent a significant shift in U.S. public health protection, as they begin to address the high risks that non-judicious use of antimicrobials in animals pose for human health – in the form of increases in drug resistance and potential treatment failures. We are concerned, however, that they are insufficient and that stronger regulation is needed.

There is no reason to expect compliance from agribusiness, in view of its long history of rebuffing regulatory efforts to curb antibiotic use. In addition, FDA considers use of antibiotics for disease prevention to be a therapeutic use, essential to animal health. Since many drugs that have been approved for growth promotion purposes have also been approved for routine disease prevention, we are concerned that industry will not reduce overall antibiotic use, but merely shift from growth promotion to prevention. We request that FDA address antibiotics used for prevention and recommend and provide incentives for using alternative strategies, such as vaccines, probiotics, and improved management practices, for disease prevention and control. We suggest that further guidance clearly describe plans for monitoring progress. Specifically, the further development of our national antimicrobial resistance monitoring system to include more geographic representation and species-specific data on resistance and antimicrobial use in animals and humans would go a long way to inform and evaluate practitioner compliance and outcomes.

According to the U.S. CDC and WHO, antimicrobial resistance is one of the top five public health threats. What is needed is an overall reduction in antimicrobial use, achieved by offering economic incentives to adopting alternatives in conjunction with further regulatory and legislative action. We strongly support the passage of the Preservation of Antibiotics for Medical Treatment Act (PAMTA, H.R. 1549, S.619), which would withdraw the use of seven classes of antibiotics that are critically important to human health from food animal production, unless specific disease conditions apply. Now is the time to act. Thank you for your consideration.

Sincerely yours,

**Stuart Levy, MD**

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2007 Nobel Laureate

**Julian Davies, PhD**

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\* ASM = American Society for Microbiology

\*\*AAAS = American Association for the Advancement of Science

\*\*\* IDSA = Infectious Disease Society of America

\*\*\*\* AAM = American Academy of Microbiology

cc: Kathleen Sebelius, Secretary of the Department of Health and Human Services (HHS)  
Harry Reid, US Senate Majority Leader  
Mitch McConnell, US Senate Minority Leader  
John Boehner, Speaker of the House  
Eric Cantor, House Majority Leader, US House of Representatives  
Nancy Pelosi, Minority Leader, US House of Representatives  
Bernadette Dunham, Director, Center for Veterinary Medicine, FDA