

**JOINT STATEMENT FOR THE RECORD**  
**Subcommittee on Health, Committee on Energy & Commerce**  
**U.S. House of Representatives**

**For the Hearing On Antibiotic Resistance And The Use Of Antibiotics**  
**In Animal Agriculture**

July 14, 2010

As organizations committed to protecting patients, public health, animal health, and food safety, we wish to submit this written testimony to express our concern about the misuse of antibiotics in agriculture and our strong support for policies, including the Preservation of Antibiotics for Medical Treatment Act (PAMTA, H.R. 1549, S. 619), that will institute a public health approach to antimicrobial use in animals. We commend the Subcommittee on Health for holding hearings to examine the growing public health threat of antibiotic resistance, including today's hearing specifically on the contribution of animal agriculture to the problem. We urge the Subcommittee to follow these hearings with prompt legislative action to greatly reduce or eliminate the non-judicious use of important antibiotics in animal feed and water.

Our combined memberships include the country's foremost scientific and medical experts and represent more than nineteen million concerned Americans and health professionals. Our position is based on objective health interests and concerns that dangerous drug-resistant infections are rapidly increasing in hospitals and community settings, causing unnecessary human suffering and adding to the economic burden of U.S. healthcare costs as well as jeopardizing the effectiveness of treatments for sick animals.

The development of antibiotics to treat life-threatening infections has been one of the most notable medical achievements of the past century. Physicians, healthcare professionals, and public health and food safety advocates are greatly concerned about the growing body of scientific evidence demonstrating that antimicrobial drug use in livestock and poultry contributes to the spread of drug-resistant bacteria to people. Drug-resistant organisms are plaguing Americans, including otherwise healthy individuals, in healthcare settings and communities across the country. We are pleased that these concerns finally are being recognized and that Congress is poised to consider solutions to forestall epidemics of untreatable infections.

Specifically, we support phasing out the use of antimicrobial drugs for growth promotion and feed efficiency, much more limited use for disease prevention, and requiring that all uses of these drugs be carried out under the supervision of a veterinarian and within the boundaries of a valid veterinarian-client-patient relationship – which we expect will end over-the-counter sales of tons of antimicrobial drugs annually. We support clearly defining the limited instances where antibiotics may be used judiciously in food animals for purposes of disease prevention and control and are eager to work with policymakers to ensure that any legislation considered is fully protective of public health. We urge Congress to enact a new antimicrobial policy that is mandatory, retroactive to already-approved drugs, and enforceable, in order to best guarantee a significant reduction in non-judicious antibiotic use.

While the U.S. Food and Drug Administration recently issued a draft guidance that suggests agreement with some of these principles, we are concerned that the agency has not clearly indicated to what extent preventative uses are encompassed in the guidance, nor has it laid out a timeline for action or a commitment to regulatory steps. It is therefore imperative that Congress act swiftly to protect public health. PAMTA is a sound science-based approach that is backed up by scores of scientific and medical publications and will protect the health of every American.

By enacting PAMTA, Congress would eliminate non-judicious uses of antimicrobial drugs, including for purposes of growth promotion, feed efficiency and non-judicious disease prevention which have been practiced in animal agriculture for several decades. This would better protect the public against resistant infections and preserve the power of existing antibiotics. In addition, we urge Congress to ensure long-overdue veterinary supervision of all antibiotic uses in animals and end over-the-counter sale of antibiotics for animal agricultural uses. The sale of antibiotics for use in human medicine requires a prescription; there is no reason to permit a lower standard for agricultural purposes where considerably more antibiotic drugs are used annually. Finally, we would urge Congress to examine whether veterinarians should be permitted to sell antibiotics for a profit. Such a marketing paradigm fosters inherent conflicts of interest that could lead to non-judicious uses of these precious drugs. In 1995, Denmark put significant limits on the ability of veterinarians to profit from the sale of antibiotics in food animal production. This led directly to a reduction in total usage of antibiotics, especially tetracyclines.

Adopting such policies would reflect the concerns of a broad consensus of the scientific, medical, public health and international health communities. Such consensus is buttressed by the actions of expert bodies and governments. For example:

- Since 2002, the World Health Organization (WHO) has called upon all nations to terminate or rapidly phase out the use of antimicrobial growth promoters in food animals.
- In 2003, the Institute of Medicine (IOM) of the National Academies of Science called on the FDA to ban the use of antimicrobials for growth promotion in animals, if those drugs were also used in human medicine.
- In 2006, the European Union banned non-therapeutic use of antimicrobials, because such use was found to raise food safety concerns, and the ban was instituted to protect against further development of antimicrobial resistance.

We recognize that phasing out of antibiotics for non-judicious uses in animals will require changes in the agricultural industry. But protection of the public's health must come first, and the phase-out can be conducted in a way that minimizes costs to the agriculture industry. Farmers in Europe have adapted to such a policy without undue disruption of production or increased consumer costs; the United States can learn from that experience while also protecting American lives. In addition, the U.S. Department of Agriculture has recognized that various production methods used in the United States today are viable alternatives to non-judicious antimicrobial uses and such alternatives are employed with little negative – or even with somewhat positive – economic impact to producers.

We urge you to advance scientifically sound policies to phase out growth promotion and feed efficiency uses, and to strictly manage a narrow set of prophylactic uses while mandating veterinary-patient relationships and eliminating the over-the-counter sale of antibiotics for use in animals.

We remain committed to working with the members of the Energy and Commerce Committee to design these approaches in ways that will best protect the lives and health of both humans and animals.

Alliance for the Prudent Use of Antibiotics

American Academy of Pediatrics

American Association of Critical-Care Nurses

American Medical Association

American Nurses Association

American Public Health Association

American Society of Health-System Pharmacists

APIC—Association for Professionals in Infection Control and Epidemiology, Inc.

Consumers Union

Food Animal Concerns Trust

Humane Society of the United States

Infectious Diseases Society of America

Institute for Agriculture and Trade Policy

Keep Antibiotics Working

Michigan Antimicrobial Resistance Reduction Coalition

National Foundation for Infectious Diseases

Society of Infectious Disease Pharmacists

The Pew Charitable Trusts

Trust for America's Health

Union of Concerned Scientists