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U.S. Roundtable for Sustainable Beef,
9110 E Nichols Avenue, Suite 300
Centennial, CO 80112

RE: USRSB Sustainability Framework

The Pew Charitable Trusts (Pew) appreciates this opportunity to provide public comments on the antibiotic stewardship component of the USRSB Sustainability Framework. Pew applies a rigorous, analytical approach to improve public policy, inform the public and stimulate civic life. Through our Antibiotic Resistance Project, we seek to reduce public health risks posed by the inappropriate use of antibiotics in humans and animals by creating incentives for the implementation of judicious use principles and practices, strengthening oversight, and fostering innovation in drug development.

Pew applauds USRSB's efforts to address the important issue of antibiotic stewardship and the sustainability challenge that antibiotic use represents for the U.S. beef industry. As drafted, the proposed framework highlights important principles and components essential to good antibiotic stewardship in production agriculture, including the fundamental importance of animal health and well-being, pre-conditioning and other best management practices, as well as continuous veterinary engagement to foster judicious antibiotic use. Pew and the Farm Foundation recently moderated a two-year dialogue among key stakeholders that addressed these issues in detail, involving major food companies, retailers, and livestock, trade and professional associations, to ensure that antibiotics are used judiciously throughout production to protect animal and public health. The resulting framework, which was released on December 18, 2018, defines effective antibiotic stewardship for animal agriculture and lays out its core components and guiding principles for effective implementation.

As described in the attached submission, the 15 core components of the antibiotic stewardship framework prioritize veterinary guidance and partnership, disease prevention strategies, and optimal treatment approaches, as well as record keeping and a culture of continuous improvement and commitment to antibiotic stewardship. The components address education, implementation, and evaluation steps for phasing in stewardship programs. The framework's guiding principles are intended to help ensure that stewardship programs have a clear scientific basis, are transparent, minimize the risk of unintended consequences, encourage the consideration and use of alternatives to antibiotics whenever possible, and focus producer and veterinarian attention on long-term sustainability. Ultimately, the framework seeks to foster and validate the continuous improvement of science-based and well validated stewardship practices, and to implement best practices for judicious antibiotic use throughout the animal production system.

Pew urges USRSB to ensure that the antibiotic stewardship component of the Sustainability Framework incorporates this antibiotic stewardship framework that key members of the animal agriculture industry recently developed. USRSB should consider adding or strengthening core aspects of antibiotic stewardship that are not fully identified in the current draft USRSB framework, for instance around the

need for robust recordkeeping practices, encouraging a culture of partnership between veterinarians and producers, and a commitment to continuous improvement.

In conclusion, Pew commends USRSB for developing this draft framework and we appreciate the opportunity to provide comments to assist the Roundtable in finalizing the stewardship component of its Sustainability Framework. A comprehensive, transparent, and tangible framework for antibiotic stewardship in the beef industry will provide an important catalyst for change, and close alignment with widely accepted stewardship standards like those embodied in the Stewardship Framework will avoid confusion and magnify its impact.

Sincerely,



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The Pew Charitable Trusts



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