THE PEW CHARITABLE TRUSTS

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February 19, 2020

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

Desk Officer for Agriculture
Office of Information and Regulatory Affairs, Office of Management and Budget (OMB)
New Executive Office Building
725 17th Street NW
Washington, DC 20502

RE: Document No. 2020-02113; OMB Control No. 0579-0079: Comment Request; National Animal Health Monitoring System; Health Management on U.S. Feedlots 2020

Dear Dr. Shere:

The Pew Charitable Trusts (Pew) strongly supports the U.S. Department of Agriculture's (USDA, the Agency) efforts to collect information on cattle health management practices, antimicrobial use and stewardship patterns, disease prevalence, and other relevant data through the 2020 National Animal Health Monitoring System (NAHMS) Feedlot Study. 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.

USDA's NAHMS studies are a valuable source of nationally representative data on animal health and management as well as antibiotic stewardship practices, and offer valuable insights into the U.S. animal agricultural industries. In 2017, USDA for the first time conducted a targeted NAHMS study on antimicrobial use and stewardship practices on U.S. beef feedlots, in addition to expanding their data collection effort to include feedlots with a capacity of 50-999 head of cattle.[1] These additional data serve as an important benchmark for future studies and shed light on antimicrobial use and stewardship practices that will help to bolster nationwide efforts to use antimicrobials judiciously in animal agriculture.

The U.S. Food and Drug Administration's (FDA) 2018 Annual Summary Report on Antimicrobials Sold or Distributed for Use in Food-Producing Animals showed a 9% increase in the sale of medically important antimicrobials.[2] This recent increase in the sale of medically important antimicrobials for use in animal agriculture renders USDA's data collection efforts

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even more critical to understanding antimicrobial use in livestock and to combatting antibiotic resistance (AMR). USDA has committed to collecting information on antimicrobial use and stewardship in swine and feedlot cattle every two years.[3] This is an important component of FDA's efforts to address AMR in its five-year plan for supporting antimicrobial stewardship in veterinary settings.[4]

In order to make the 2020 Feedlot Study optimally useful in informing efforts to combat AMR, Pew makes the following recommendations to further strengthen USDA's data collection:

1. **Establish incentives to maximize voluntary participation in the study.** Producer participation in NAHMS surveys is voluntary and requires recognition among participants of the value provided by the program. Prior to each study, USDA carries out an important "Needs Assessment" survey, which solicits stakeholder input to determine the critical information gaps related to the industry, in addition to asking respondents about the attractiveness of potential incentives to achieve higher participation rates. In the Needs Assessment conducted prior to the 2017 NAHMS Beef study, the highest number of respondents ranked feed or forage analysis as a top incentive, with high numbers of respondents also prioritizing testing for infection with bovine viral diarrhea virus, genomic testing, and obtaining electronic ID tags.[5] USDA should consider exploring which incentives will generate the highest voluntary participation rates among beef producers while continuing to ensure that any incentives offered do not result in a skewed respondent population.
2. **Include survey questions that will garner additional valuable information on cattle health and management practices.** USDA can ensure that the data it collects is as useful as possible by including targeted survey questions that reveal deeper information about antibiotic use practices, allow stakeholders to draw meaningful connections between data points, and create synergies between federal agencies working to reduce AMR. For example, the 2020 Feedlot Study should include questions on durations of use for antimicrobials. This information is extremely valuable to FDA's efforts to align antibiotic labels with judicious use principles and would give both FDA and USDA actionable data upon which to advance their AMR initiatives. USDA should also consider including survey questions that provide for better understanding of the connection between such data points as disease prevention practices, disease pressures, and antibiotic use practices on feedlots. The Agency could also explore how certain management factors and organizational practices – such as dividing cattle into groups by weight (over or under 700 pounds) – affect the data collected.
3. **Commence the data collection as soon as possible and expedite the release of study results.** Pew acknowledges the time and effort required to collect and publish granular and complicated data. However, the recent release of FDA's antibiotic sales data illustrates the difficulties associated with significant lags between study and publication dates. In order to make meaningful policy action, agencies must be able to characterize problems in a reasonably prompt manner. Data collection for the 2017 Feedlot Study

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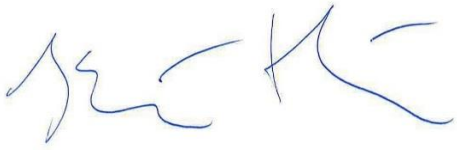
ended in August of 2017,[6] but results were not published until May of 2019.[7] The delay in publication of results renders evidence-based policy action very difficult. USDA should move to publish its data as quickly as possible in order to optimally use this important information to contribute to the fight against AMR.

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

Sincerely,



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[1] United States Department of Agriculture, "Antimicrobial Use and Stewardship on U.S. Feedlots, 2017" (2019).
[2] Food and Drug Administration, "2018 Summary Report on Antimicrobials Sold or Distributed for Use in Food-Producing Animals" (2019), https://www.fda.gov/media/133411/download.
[3] The Pew Charitable Trusts, "Reports Offer Valuable Information on Antibiotic Stewardship in U.S. Agriculture" (2019), https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2019/09/reports-offer-valuable-information-on-antibiotic-stewardship-in-us-agriculture.
[4] Food and Drug Administration, Center for Veterinary Medicine, "Supporting Antimicrobial Stewardship in Veterinary Settings - Goals for Fiscal Years 2019-2023" (Center for Veterinary Medicine, 2018), https://www.fda.gov/downloads/AnimalVeterinary/SafetyHealth/AntimicrobialResistance/UCM620420.pdf.
[5] U.S. Department of Agriculture, "Information Needs Assessment Survey Results for the Upcoming Nahms Beef 2017 Study" (2016), https://www.aphis.usda.gov/animal_health/nahms/beefcowcalf/downloads/beef2017/NeedsAssess.pdf.
[6] U.S. Department of Agriculture, "Nahms Antimicrobial Use on U.S. Feedlots, 2017 Study" (2017), https://www.aphis.usda.gov/animal_health/nahms/amu-beef-launch.pdf.
[7] United States Department of Agriculture, "Antimicrobial Use and Stewardship on U.S. Feedlots, 2017."