PRESERVING ANTIBIOTICS ACCESS

Issue:
Agriculture has a primary interest in ensuring that all animal health products, including antibiotics, continue to be safe and effective. In order to raise healthy animals, farmers and ranchers need tools to keep animals healthy – including medicines that have been approved by the Food and Drug Administration (FDA). Restricting access to these important tools will jeopardize animal health and compromise their ability to raise and produce a healthy and safe product.

Background:
Antibiotic resistance in humans is a substantial and growing problem in the healthcare community. The development of bacterial resistance to certain antibiotics poses a serious public health threat. However, it is important to note that antibiotic use in animals has not been scientifically linked to increases in human antibiotic resistance. In more than 40 years of antibiotics being used in animals, a public health threat has not arisen and recent government data shows the potential that one might occur is declining. Bacteria survival through food processing/handling is decreasing, food-borne illness is down, development of antibiotic-resistant bacteria in animals is stable and resistant food-borne bacteria in humans are declining.

Legislative/Regulatory Status:
In 2012, FDA issued three documents to guide the agency’s strategy for antibiotic use in livestock and poultry. The actions represent a voluntary initiative to phase in certain changes to how medically important antimicrobial drugs are labeled and used in food-producing animals. The documents are Final Guidance 209, Draft Guidance 213 aimed at phasing out growth promotion claims and transitioning to prevention claims for medically important antibiotics and a draft Veterinary Feed Directive. According to FDA, the agency is taking this action to help preserve the effectiveness of medically important antimicrobials for treating disease in humans. Under the new voluntary initiative, certain antibiotics would not be used for so-called “production” purposes, such as to enhance growth or improve feed efficiency in an animal. These antibiotics would still be available to prevent, control or treat illnesses in food-producing animals under the supervision of a veterinarian.

In Sept. 2014, the President’s Council of Advisors on Science and Technology (PCAST) released a report on antibiotics resistance. In the report, PCAST recommends a set of practical and actionable steps that the government should take to bring the antibiotic-resistance crisis under control, through focused efforts in three areas:

1. Improving our surveillance of the rise of antibiotic-resistant bacteria to enable effective response, stop outbreaks, and limit the spread of antibiotic-resistant organisms and acting on surveillance data to implement appropriate infection control;

2. Increasing the longevity of current antibiotics, by improving the appropriate use of existing antibiotics, preventing the spread of antibiotic-resistant bacteria and scaling up proven interventions to decrease the rate at which microbes develop resistance to current antibiotics; and
3. Increasing the rate at which new antibiotics, as well as other interventions, are discovered and developed.

Additionally, PCAST supports FDA's Guidance 209 and Guidance 213, designed to promote the judicious use of antibiotics in agriculture. In conjunction with the report, an Executive Order requires that, by Feb. 2015, a Task Force for Combating Antimicrobial Resistant Bacteria, to be co-chaired by the Secretaries of Defense, Agriculture and HHS, identify actions that will provide for the facilitation and monitoring of implementation of the National Strategy for Combating Antibiotic-Resistant Bacteria as laid out by PCAST.

**AFBF Policy:**
Given current data on the risk assessment of livestock antibiotics, Farm Bureau opposes restricting the use of antibiotics. It is important that decision-makers review demonstrated scientific evidence of the risks and benefits of potential future actions. Farm Bureau has serious concerns about the effects of removing important antibiotics and classes of antibiotics from the market, which would handicap veterinarians and livestock and poultry producers in their efforts to maintain animal health and protect our nation's food supply. Further limiting or eliminating animal antibiotic use for livestock will have negative economic and animal health consequences.

Farm Bureau supports:

1. Sound science as the basis for decision-making and policy development regarding antibiotics/antimicrobials used in food animal production;

2. Use of the National Antimicrobial Resistance Monitoring System, the National Animal Health Monitoring System and the Department of Agriculture's food safety monitoring system to address issues of antimicrobial resistance trends in food-borne bacteria and animal health;

3. Regulation of antibiotics/antimicrobials at the national level to avoid a state-by-state patchwork of regulation;

4. A multi-agency approach to on-farm antimicrobial-resistant bacteria trend research and surveillance between the Animal and Plant Health Inspection Service, Agricultural Research Service, Food Safety and Inspection Service and livestock producers; and

5. Rather than limitations or elimination of animal health and food safety protection tools, Farm Bureau would accept veterinarian oversight of antibiotic use, where veterinarian oversight is defined as a working relationship with a licensed veterinarian and allow for the purchasing of animal pharmaceuticals using a prescription without the requirement of purchasing directly from a veterinarian.