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## **PRESERVING ACCESS TO ANTIBIOTICS**

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### Issue:

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

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### Background:

Bacterial resistance to certain antibiotics poses a serious public health threat and prompts wide concern for human health. While all users of antimicrobials contribute to risk for resistance, antibiotic use in animals has not currently been scientifically linked to increases in human antibiotic resistance.

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### Legislative/Regulatory Status:

Since 2012, the FDA has issued three documents to guide the agency's strategy for antibiotic use in food animals. Guidance for Industry (GFI) #209 outlines resistance issues and identifies judicious use principles for medically important antimicrobials in food-producing animals: limiting use to therapeutic purposes and calling for veterinarian oversight. GFI #213 calls for voluntary removal of production claims (growth promotion and feed efficiency) on medically important antimicrobials delivered by feed or water and bring therapeutics uses (treatment, prevention, control) of those drugs under veterinarian oversight. GFI #120 implements a Veterinary Feed Directive (VFD) to fulfill the veterinary oversight provisions outlined in GFI #213; the VFD compliance deadline is Jan. 1, 2017. Injectable or oral drugs are not affected by these changes.

According to FDA, the agency is taking this action to preserve the effectiveness of medically important antimicrobials for treating disease in humans. Animal production claims will be prohibited for these drugs, but veterinarian oversight will allow for continued use to prevent, control or treat illnesses in food-producing animals.

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 in human and animal health to bring the antibiotic-resistance crisis under control, through focused efforts in three areas:

- 1) Improving surveillance of the rise of antibiotic-resistant bacteria to enable effective response, stop outbreaks, and limit the spread of antibiotic-resistant organisms;
- 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.

In conjunction with the report, an Executive Order required that a Task Force for Combating Antimicrobial Resistant Bacteria be co-chaired by the secretaries of Defense, Agriculture and HHS and identify actions to provide for the facilitation and monitoring of implementation of the National Strategy for Combating Antibiotic-Resistant Bacteria.

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#### AFBF Policy:

It is important that decision-makers review demonstrated scientific evidence of the risks and benefits of potential future actions regulating the use of antimicrobial products. Farm Bureau has serious concerns about the impact of removing important antimicrobials from the market, which would hinder efforts of veterinarians and livestock and poultry producers to assure animal health and protect our nation's food supply. We favor judicious use and withdrawal restrictions of feed additives and therapeutics and oppose banning these animal health products.

#### 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;
- 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;
- 6) FDA's VFD preserving the right for producers to use feed additives and injectable antibiotic products; and
- 7) Amending the VFD to allow veterinarians to prescribe extra-label use of antimicrobial drugs in animals when warranted, including the treatment of minor species.

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