KEEP ANTIBIOTICS WORKING

The Campaign to End Antibiotic Overuse

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Union of Concerned Scientists

Waterkeeper Alliance

December 28, 2005

Secretary of Agriculture Michael Johanns
Department of Agriculture
1400 Independence Avenue, SW.,
Washington, DC 20250–3355
Submitted via e-mail: FarmBill@usda.gov

Re: Public comment on 2007 Farm Bill

Dear Secretary Johanns:

Keep Antibiotics Working (KAW) appreciates this opportunity to submit comments on the development of recommendations for the 2007 Farm Bill (Federal Register, Vol. 70, No. 116). We welcome USDA's request for public input and feel strongly that such input is essential to the process by which the agency's recommendations will be developed.

Keep Antibiotics Working (www.KeepAntibioticsWorking.com) is a coalition of health, consumer, agricultural, environmental, humane and other advocacy groups with more than nine million members dedicated to eliminating a major cause of antibiotic resistance: the inappropriate use of antibiotics in food animals. To ensure the continued effectiveness of antibiotics important for treating sick people and animals, KAW advocates for a responsible approach to antibiotic use in animal agriculture.

Our comments respond to two of the questions posed by the agency in its notice, specifically: (1) How farm policy should be designed to maximize U.S. competitiveness and the United States' ability to effectively compete in global markets; and (2) How agricultural product development, marketing and research-related issues should be addressed in the next Farm Bill.

Background

Antibiotic resistance is an undeniably serious and growing problem in the United States, one caused by overuse of antibiotics both in human medicine and in agriculture. An estimated 70% of the antibiotics used in the U.S. each year are fed to farm animals on a routine basis – not to treat disease, but rather to make the animals grow slightly faster and to compensate for crowded and unhealthy conditions. Resistant bacteria created by the inappropriate use of antibiotics in agriculture most commonly affect humans through contamination of meat products, but may also reach people via the environment, particularly air, water, and soil contaminated with manure. Antibiotic resistance already costs our society billions of dollars each year in additional medical expenditures, to say nothing of the economic and emotional impacts on patients and their families as bacterial illnesses grow harder and harder to treat.

Competitiveness of U.S. agriculture in global and domestic markets

In May 2004, the U.S. Government Accountability Office (GAO) released a report highlighting the looming trade implications for countries that do not improve their agricultural antibiotic-use practices to meet those of

industry leaders.[1] GAO noted that U.S. meat exports were about $7 billion in 2002 (p. 16) and observed that two of our major competitors in world meat markets (New Zealand and Denmark) have banned use of medically important antibiotics for growth promotion in food animals, as has the European Union (p. 43). GAO further noted that Japan, a major market for US meat exports, is now reviewing such uses (p. 43) and considering a ban. The report flags the need for collection of better data on antibiotic use in agriculture.

In addition, a 1999 report from Iowa State University concluded that "losses to the U.S. pork industry associated with a loss of an important export customer such as Japan [due to a non-tariff barrier based on concerns about growth promoter use] would dwarf the losses associated with a ban [on use of growth promoters]."[2]

Thus, to keep up with international trends and maintain, if not expand, their market share, U.S. meat producers need to reduce antibiotic use. In particular, use of medically important antibiotics (i.e., antibiotics that belong to classes also used in human medicine) as feed additives for purposes other than treatment of sick animals must be curtailed. Both to support international trade and to promote public health, the 2007 Farm Bill should provide assistance to those producers who do not use these feed additives and to those producers seeking to transition away from such use of antibiotics. As described below, appropriate research and marketing support could facilitate changes in livestock production, and thus improve our country's ability to participate fully in the global meat market.

Opportunities to expand agricultural products, markets, and research

The Farm Bill should give high priority to research that aids farmers making the transition away from use of medically important antibiotics as feed additives. Key areas for research include, but are not limited to:

- Assessment of various approaches to disease prevention and growth promotion which might obviate the need for antibiotics e.g., changes in time or weaning, stocking densities, vaccines, and diet
- On-farm demonstration studies that would assist farmers in reducing antibiotic use in animal production, especially the use of medically important drugs, as feed additives
- Identification of the barriers to reduced antibiotic use on conventional farms
- Identification of the bottlenecks limiting availability of meat and poultry raised with reduced antibiotics

Data collection on antibiotic use in animal agriculture and of monitoring antimicrobial resistance is also of great importance to both human and animal health. Government-collected data on production of antibiotics for agricultural use is vital in tracking the effectiveness of interventions to reduce antibiotic use. Currently, comprehensive governmental data on agricultural use of antibiotics do not exist. The 2007 Farm Bill should include a provision for mandatory collection of such data from the producers of agricultural antibiotics.

The Farm Bill should also play a role in encouraging the value-added markets for alternatively-produced meat and poultry, including meat produced with reduced antibiotics. No or reduced use of antibiotics are features of many premium-priced meat products. The Farm Bill should promote greater use of resources to help farmers and ranchers to adopt these practices and market the products to consumers. To prevent confusion in the market place, we also support efforts that require clear labeling of antimicrobial drug use.

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[1] ANTIBIOTIC RESISTANCE: Federal Agencies Need to Better Focus Efforts to Address Risk to Humans from Antibiotic Use in Animals, GAO-04-490, April 2004. www.gao.gov/cgi-bin/getrpt?GAO-04-490 (accessed December 27, 2005)

[2] Dermot J Hayes, Helen Jensen, Lennart Backstrom, and Jay Fabiosa. Economic Impacts of a Ban on the Use of Over-the-Counter Antibiotics in U.S. Swine Rations. 1999. CARD Staff Report December 1999. http://www.card.iastate.edu/publications/DBS/PDFFiles/99sr90.pdf (accessed December 27, 2005)

In addition, USDA should explore ways to provide the slaughtering and processing infrastructure necessary to support alternative meat and poultry production, including assistance in complying with meat safety regulations.

Finally, we support the expansion of value-added and cooperative development grants in the Farm Bill, as well as the expansion and improvement of the Business and Industry Loan Program to assist producers in making equity investments in new cooperatives. In addition, the 2007 Farm Bill should also help establish and promote new cooperatives that enable farmers to sell meats produced with fewer antibiotics along with other value-added products. Because independent cooperatives play a key role in both providing farmers with feed free of antibiotics, and in marketing value-added products, it is important that the Farm Bill also consider ways to buttress new and existing cooperatives so that they may remain viable.

We appreciate this opportunity to submit comments. Thank you for your consideration.

Submitted on behalf of the Keep Antibiotics Working coalition by:

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