



LOUISE M. SLAUGHTER
CONGRESS OF THE UNITED STATES
28TH DISTRICT, NEW YORK

November 1, 2010

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Dear Secretary Vilsack:

We appreciate the commitment of the United States Department of Agriculture (USDA) to work with its federal partners to ensure that antibiotics are used prudently in livestock animal production. We believe that USDA has the ability and resources to take additional steps to reduce inappropriate usage of antibiotics on farms. Specifically, we urge USDA to: 1) increase monitoring and technical advice provided to farms; 2) expand research on animal husbandry and antibiotic resistance; 3) increase veterinary involvement in the usage of antibiotics; and 4) provide further information on the participants and timeline for the new USDA working group on antibiotics on farms.

On August 13, 2010, we received your letter providing a detailed update on USDA's activities on antibiotic resistance. We are pleased to learn that USDA is considering an "antibiotics module" for the large animal vets that the agency certifies. Likewise, we appreciate the indication that USDA plans to create a united report on antibiotic resistance. Finally, we are pleased that USDA has issued a call through its Cooperative Extension Agents for integrated proposals aimed at "Minimizing Antibiotic Resistance Transmission throughout the Food Chain."

However, we would like to make the following four recommendations in order to strengthen USDA's response:

Increase Monitoring and Surveillance

In your letter received on August 13, 2010, USDA indicated that it plans to expand surveillance and monitoring on antibiotic usage and antibiotic resistance. Annual reporting on the total quantity of antibiotics used in the agricultural setting is of paramount importance to public health. In addition, we would like to request clarification on USDA's plan to expand the samples collected in the National Antimicrobial Resistance Monitoring System (NARMS). While USDA deferred all questions about NARMS to the Food and Drug Administration (FDA), the sample collection is performed by USDA. We believe that the scope of this survey should be expanded and look for antibiotic resistant microbes on the farm. As you know, safe food begins on the farm, and thus it is essential that we monitor how our production practices affect the presence and prevalence of antibiotic resistance. Given the urgent public health concerns, we request a clear timeline with deliverables on USDA's plan to expand surveillance of antibiotic usage and antibiotic resistance in the agricultural sector.

Expand research on animal husbandry and antibiotic resistance

The Agricultural Research Service and National Institute for Food and Agriculture is an excellent resource for research, education and extension on alternatives to medically important antimicrobials for disease prevention and control as well as livestock management practices that ensure animal health while minimizing antibiotics. We would like to request a comprehensive update on its activities. Specifically, we look forward a list of all the research, including: 1) principal investigator; 2) institutional affiliation of the principal investigator; 3) title of research; and 4) funding.

Increase Veterinary Role in Antibiotic Usage on Farms

In the June 10th letter, USDA indicated that the ARMS “respondents to whom the survey is directed, rarely know the quantities of antibiotics provided even if they are aware that antibiotics are provided” and that “most respondents are unaware of the quantities of [sub-therapeutic antibiotics] fed because feed is provided to them by their contractors.” Given USDA’s assessment that farmers are not able to monitor antibiotic usage on their own farms, we recommend enhancing veterinary engagement on this issue.

Expand Veterinary Training on Antibiotic Usage

The USDA has indicated that it is investigating the development of an additional module during the Category II veterinary accreditation processes which reviews husbandry practices that reduce antibiotic usage. Veterinarians play a key role in transforming farm practices and improved education will reduce unnecessary antibiotic use. We look forward to your update on the plans for the development of the module to educate veterinarians.

Working Group on Antibiotic Usage on Farms

In addition to your letter, when our staffs met on August 3, 2010, we were informed that USDA was planning to convene a working group to examine the issue of usage of antibiotics on farms. We are delighted that USDA is expanding its efforts on antibiotic resistance. We would like to receive additional information on this working group. In particular, please let us know: 1) the official name of the working group; 2) the chair of the working group; 3) the membership list; and 4) the action items and timeline for delivery.

As this working group is convened, we anticipate that they will explore and answer the concerns that we articulated during our recent meetings.

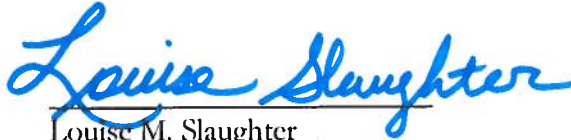
Every year, two million Americans acquire bacterial infections during their hospital stay, and 90,000 will die from them. 70 percent of their infections will be resistant to the drugs commonly used to treat them. In 1998, an Institute of Medicine study concluded that antibiotic resistant bacteria cost the hospital system an additional \$5 billion. A more recent study – based on exhaustive chart reviews in Cook County Hospital in Chicago – would lead to a current nationwide estimate of \$16.6 billion to \$26 billion in annual costs. In his letter sent to Congress on July 13, 2010, Dr. Thomas R. Frieden, the director of the Centers for Disease Control and Prevention warned that there is “a clear link between antibiotic use in animals and antibiotic resistance in humans.”

Addressing this critical issue is not only important for protecting the public’s health, but also to ensure that United States livestock producers remain competitive in international markets. The European Union, New Zealand, Thailand, and Korea all have either banned or will begin banning antibiotic growth promoters in animal feed. Under World Trade Organization rules, trading

partners who implement this ban will have the right to refuse imports that do not meet this standard. Consequently, if the United States continues to allow non-therapeutic use of antibiotics in livestock, there may be major trade and economic implications.

We appreciate your continued attention to this and on so many other issues of importance to our constituents. Reducing unnecessary antibiotic usage on farms will benefit all Americans and we look forward to your response. It is time for USDA to publically recognize that the industrial food animal production system is a leading contributor to the increase of antibiotic resistance in pathogens that infect people and animals.

Sincerely,



Louise M. Slaughter
Member of Congress