

July 2, 2014

John P. Holdren, Ph.D.
Eric Lander, Ph.D.
Co-Chairs
President's Council of Advisors on Science and Technology
Eisenhower Executive Office Building
1650 Pennsylvania Avenue, NW
Washington, DC 20504

Dear Drs. Holdren and Lander:

The undersigned public health, consumer, and environmental protection organizations are writing to thank the President's Council of Advisors on Science and Technology (PCAST) for taking up the public health threat of antibiotic resistance. We eagerly await release of your upcoming report, in particular any recommendations that call for aggressive steps to stem the overuse of medically important antibiotics in food animal production, beyond what is currently being advanced by the U.S. Food and Drug Administration.

We recognize that FDA, through Guidance for Industry #213 and a proposed Veterinary Feed Directive (VFD) rule, has taken first steps intended to reduce antibiotic overuse in farming. However, we are highly concerned that inherent policy flaws will result in minimal public health benefit. For example, by focusing on removing only growth promotion from drug labels, the agency is missing a likely significant amount of antibiotic use for disease prevention, including uses recognized by the agency as injudicious. It is inappropriate for the agency to allow uses injurious to public health to remain approved on antibiotic product labels. Another key policy flaw is the proposed removal from the existing VFD regulations of a federal valid veterinary-client-patient relationship (VCPR) standard. No plausible justification has been made by FDA for this change. FDA has stated that one of the goals of the revision is to end over-the-counter use in feed, but there is no clear substitute in federal or state law that ensures on-farm veterinary engagement regarding antibiotic use in animal feed. This rescission is particularly damaging given the agency's failure to pursue label changes ending approvals for injudicious disease prevention.

We urge PCAST to recommend restoration of the VCPR standard plus additional policy measures that would rein in all indiscriminate, untargeted, and unnecessary antibiotic use in meat and poultry production. Recent drug and agribusiness media statements suggest companies may continue to rely on important antibiotics to "prevent disease" that is not present or threatening animal health.ⁱ In a scenario where those uses are still allowed, and a veterinarian may not be required to visit the animals or the premises where they reside, it is difficult to imagine what will drive meaningful reductions in antibiotic use.

Thank you for your consideration. Should you have any questions, please do not hesitate to contact Shannon Heyck-Williams at sheyck-williams@pewtrusts.org, who can connect you with us.

Sincerely,

Alliance for the Prudent Use of Antibiotics
American Academy of Pediatrics
American College of Preventive Medicine
Association for Professionals in Infection Control and Epidemiology
Center for Food Safety
Center for Foodborne Illness Research and Prevention
Center for Science in the Public Interest
Consumers Union
Dignity Health
Environmental Working Group
FamilyFarmed.org
Food and Water Watch
Health Care Without Harm
The Humane Society of the United States
Johns Hopkins Center for a Livable Future
Keep Antibiotics Working
National Consumers League
Natural Resources Defense Council
Pediatric Infectious Diseases Society
The Pew Charitable Trusts
Society of Infectious Diseases Pharmacists
Trust for America's Health
U.S. Public Interest Research Group

Cc: Marjory Blumenthal, Executive Director, PCAST

Ashley Predith, Assistant Executive Director, PCAST

Michael Stebbins, Ph.D., Assistant Director for Biotechnology, OSTP

ⁱ See, for example, <http://news.poultryhealthtoday.com/videos/should-antibiotics-be-used-to-prevent-disease-in-poultry-13517>.