February 19, 2015

Secretary Sylvia Burwell
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

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

Secretary Ashton Carter
U.S. Department of Defense
1300 Defense Pentagon
Washington, DC 20301

Dear Secretaries Burwell, Carter and Vilsack,

On behalf of the American Veterinary Medical Association (AVMA), a nonprofit association representing more than 86,500 veterinarians nationwide, including those responsible for the safe use of antimicrobials in food animals, we write to explain our support for and work on behalf of the public health effort to combat antimicrobial resistance. We also want to pose a few questions, which we hope your agencies will be able to answer in the coming months.

Antimicrobial resistance has been an area of concern for the veterinary profession from the first time antimicrobials were used on the farm to ensure animal health and welfare as well as food safety. We have worked closely with the Food and Drug Administration and others to minimize any public health impacts of antimicrobial use in food animals because, like you, we strive to protect and promote both human and animal health.

Over the past several years, we have provided extensive feedback to the FDA on revisions to the Veterinary Feed Directive (VFD) that will bring medically important antimicrobials under veterinary oversight as a mechanism to ensure judicious use. The AVMA has been a leader in the development of the VFD and a major participant in the ongoing discussions since its inception in 1996.

The AVMA has also consistently supported the Public Health Action Plan to Combat Antimicrobial Resistance, developed by an interagency task force in 1999. Although the action plan represents needed steps to address this important issue, our concern is that the animal and veterinary components of the plan have been continually underfunded. Without proper funding, implementation of the plan, which calls for increased research, surveillance and product development, would be difficult or impossible.

We are disappointed that our statements regarding the reduction of, or restrictions on, the use of antimicrobials have been misconstrued by some in a way that raises doubts about our commitment to appropriate antimicrobial use. Instead, such statements reflect the AVMA’s goals of enhancing judicious use by
requiring veterinary oversight and protecting public health, animal health and welfare, and food safety.

We understand and agree with the end goal of using antimicrobials judiciously to minimize the potential threats of antimicrobial resistance, but unlike some others, we do not agree that an overall reduction in total quantity of use will result in corresponding improvements to public health. Other countries have implemented measures to decrease antimicrobial use overall (rather than focusing on appropriate antimicrobial use) in animal agriculture, and their data support our view that little to no improvement occurred in antimicrobial resistance in the human health arena. Furthermore, estimates on antimicrobial use in the United States have relied exclusively on sales data, instead of data on how antimicrobials are used, but sales data alone do not provide enough information and can lead to a serious misrepresentation of the situation. Therefore, it would be misleading to attempt to evaluate the success of implementing the FDA guidance documents on the sole basis of antimicrobial sales or distribution.

In response to the FDA’s solicitation for input, the AVMA has restated our support for the collection and analysis of additional antimicrobial use data to better understand the many factors that contribute to antimicrobial resistance development and transmission. The AVMA is establishing a task force to help inform the decisions of the relevant federal agencies on how and what data to collect on antimicrobial use in animal agriculture.

We do, however, have questions on how the U.S. Department of Agriculture plans to collect meaningful on-farm information so that the administration can determine the impact of various mitigation strategies. For example, what metrics will be used to determine the “use” of antimicrobials in food animal production and how will that information be used to evaluate the impact on resistance? FDA’s Guidance for Industry No. 209, as stated in its introduction, is focused on providing “a framework… to ensure the appropriate or judicious use of medically important antimicrobial drugs in food-producing animals.” However, we are concerned that there may be additional expectations of the new VFD process beyond its stated purpose.

We appreciate your understanding of the complexities of this issue and encourage you to gather more information on the indications of antimicrobial use, route of administration, and antimicrobial types, which will hopefully garner scientific examination of the relationship between usage practices and antimicrobial resistance trends, as part of your coordinated interagency effort.

Thank you for the opportunity to state our position and update you on the AVMA’s activities related to judiciously using antimicrobials in food animal production. We hope that you will view us as a partner in this important public and animal health effort and look forward to answering any questions. For additional information, please contact Dr. Christine Hoang, assistant director in AVMA’s Scientific Activities Division, at choang@avma.org or (847) 285-6742.

Sincerely,

W. Ron DeHaven, DVM, MBA
CEO and Executive Vice President