

November 7, 2012

Margaret A. Hamburg, M.D.
Commissioner
U.S. Food and Drug Administration
White Oak Building One
10903 New Hampshire Avenue, Room 2217
Silver Spring, MD 20993

Dear Commissioner Hamburg:

On behalf of the undersigned public health and consumer organizations, we wish to commend the U.S. Food and Drug Administration (FDA) for working with the U.S. Department of Agriculture (USDA) to plan a series of public stakeholder meetings across the country on ways to increase veterinary oversight of judicious antibiotic use in food animal production. We believe engaging large animal veterinarians and producers in such a dialogue is critical to achieving a smooth and successful transition to animal production methods that are less dependent on antibiotic use. However, we have not seen indication that these workshops will involve public health and consumer representation and urge the two agencies to ensure such participation.

As you know, misuse and overuse of medically important antibiotics in livestock and poultry is a significant contributing factor to antibiotic resistance in human pathogens. FDA has taken an important step by issuing Draft Guidance #213 to encourage drug makers to end the sale of antibiotics for production reasons (i.e., growth promotion and feed efficiency). Proposed changes to the Veterinary Feed Directive (VFD)—currently published in the form of draft pre-regulatory text—would partner with the guidance to achieve greater veterinary oversight of drugs that are today mainly used over-the-counter in farm animals. Expanding and modernizing the VFD will be a vital component to ensuring both the success of Guidance #213 in reducing on-farm antibiotic use and in protecting animal and public health.

Given that FDA's plan to combat antibiotic resistance and antibiotic overuse in food animal production greatly impacts human health, we urge the agencies to include the public health community in each aspect of its design and implementation, including stakeholder dialogue on the VFD. We also urge the agency to finalize Guidance 213 and issue a formal proposed rule regarding VFD changes by the end of 2012. Public health must begin to take precedence over short-term animal production concerns immediately if we are to successfully protect the efficacy of our antibiotics in treating deadly human—and animal—infections.

Thank you again for your leadership in stemming the growing epidemic of antibiotic resistance.

Sincerely,

Alliance for the Prudent Use of Antibiotics
American College of Preventive Medicine
American Public Health Association
Center for Food Safety
Center for Foodborne Illness Research & Prevention
Consumers Union
Food and Water Watch
Keep Antibiotics Working
Michigan Antibiotic Resistance Reduction Coalition
National Consumers League
Organic Consumers Association
The Johns Hopkins Center for a Livable Future
The Pew Charitable Trusts
Trust for America's Health
Union of Concerned Scientists

Cc: The Honorable Thomas Vilsack, Secretary, U.S. Department of Agriculture
Michael R. Taylor, J.D., Deputy Commissioner for Foods
Linda Tollefson, DVM, MPH, Associate Commissioner, Office of Foods
Bernadette M. Dunham, DVM, PhD, Director, Center for Veterinary Medicine