



July 17, 2009

Ms. Melody Barnes  
Assistant to the President for Domestic Policy  
The White House  
Washington, DC 20500

Dear Ms. Barnes:

As organizations committed to protecting patient safety and public health, the Infectious Diseases Society of America (IDSA) and Trust for America's Health (TFAH) are writing to express our strong support for the Administration's adoption of a public health approach to antimicrobial drug use in animals.

Specifically, IDSA and TFAH support the Food and Drug Administration's (FDA) plans to phase out the use of antimicrobials in animals for purposes of growth promotion and feed efficiency and to require that all other uses of antimicrobials in animals be carried out under the supervision of a veterinarian and within the boundaries of a valid veterinarian-client-patient relationship, as expressed in the FDA's recent testimony before the House Rules Committee on July 13, 2009.

Fundamental to FDA's position, and our support for it, are the principles that:

*"protecting public health requires the judicious use in animal agriculture of those antimicrobials of importance in human medicine" and that "purposes other than for the advancement of animal and human health should not be considered judicious use."*

— Dr. Joshua Sharfstein, FDA's Principal Deputy Commissioner, July 13, 2009

The Administration's decision to move away from non-judicious, i.e., inappropriate uses of antimicrobial drugs for growth promotion and feed efficiency, which have been practiced in animal agriculture for several decades, demonstrates a critical public policy shift and the Administration's commitment to sound and science-based policies that will protect the health and lives of every American. In addition, the FDA's decision to prohibit the over-the-counter sale of antibiotics for animal agricultural uses is long-overdue. The sale of antimicrobials for use in human medicine requires a prescription; there is no reason to permit a lower standard for agricultural purposes where considerably more antimicrobial drugs are used annually.

The Administration's new policies reflect the broad consensus of the scientific, medical, public health and international health communities. Such consensus is buttressed by the actions of expert bodies and governments. For example, since 2002, the World Health Organization (WHO) has called upon all nations to shift from use of antimicrobials in non-human medicine. In 2003, the Institute of Medicine (IOM) called on the FDA to ban

the use of antimicrobials for growth promotion in animals, if those drugs were also used in human medicine. In 2006, the European Union banned non-therapeutic use of antimicrobials, because such use was found to raise food safety concerns, and the ban was instituted to protect against further development of antimicrobial resistance.

Antimicrobial resistant organisms are a major cause of healthcare-associated infections (HAIs). HAIs result in hospital readmissions and unacceptably high financial burdens and are associated with an estimated 99,000 deaths each year. Treating resistant pathogens often requires more expensive drugs and extended hospital stays and also places an unreasonable and unnecessary burden on our healthcare system. Drug-resistant organisms also are plaguing Americans in communities across the country including otherwise healthy individuals. A CDC-supported study published in the *Journal of the American Medical Association* (October 17, 2007) estimated that methicillin-resistant *Staphylococcus aureus* or MRSA—just one drug-resistant form of staph—infects more than 94,000 people and kills nearly 19,000 annually around the country—more deaths than those caused by emphysema, HIV/AIDS, Parkinson’s disease and homicide. The total cost of antimicrobial resistance to the U.S. health care system was nearly \$5 billion in 1998, according to IOM. Experts believe the true costs in 2009 numbers may be ten times that amount today.

We recognize that phasing out of antimicrobials for certain “non-therapeutic” uses in animals will require major changes in the agricultural industry. But protection of the public’s health must come first, and the phase out can be conducted in a way that takes into account any economic hardships it may impose. Farmers in Europe have adapted to such a policy; the United States can learn from that experience while also protecting American lives.

We urge you to maintain the scientifically sound positions the Administration already has taken in support of phasing out growth promotion/feed efficiency uses of antimicrobials as well as in eliminating the over-the-counter sale of antibiotics for use in animals. IDSA and TFAH experts are eager to work with the Administration to implement these new approaches in ways that will best protect the lives and health of both humans and animals.

Sincerely,



Mark A. Leasure  
IDSA Chief Executive Officer



Jeff Levy, Ph.D.  
TFAH Executive Director

cc:

Secretary Kathleen Sebelius, HHS  
Dr. Dora Hughes, Counselor for Public Health and Science, HHS  
Dr. Peggy Hamburg, FDA Commissioner  
Dr. Josh Sharfstein, FDA Principal Deputy Commissioner  
Dr. Thomas R. Frieden, CDC Director  
Rep. Henry Waxman  
Rep. Rosa DeLauro  
Rep. Jack Kingston  
Rep. Louise Slaughter  
Dr. Howard Koh, Assistant Secretary for Health, HHS  
Senator Tom Harkin  
Senator Saxby Chambliss  
Senator Herb Kohl  
Senator Sam Brownback  
Rep. Collin Peterson  
Rep. Frank Lucas

***Infectious Diseases Society of America (IDSA)***

The Infectious Diseases Society of America (IDSA) represents more than 8,600 infectious diseases physicians and scientists devoted to patient care, education, research, and public health. Our members care for patients with serious infections, including antimicrobial resistant bacterial infections, meningitis, pneumonia, surgical infections, HIV/AIDS, tuberculosis, and influenza.

***Trust for America's Health***

Trust for America's Health (TFAH) is a non-profit, non-partisan organization dedicated to saving lives by protecting the health of every community and working to make disease prevention a national priority.