

October 18, 2011

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

Dear Secretary Vilsack:

As organizations committed to protecting patients, public health, animal health, and food safety, the undersigned groups are writing to express serious concern and seek clarification about comments the agency made in response to a September 2011 Government Accountability Office report, *Antibiotic Resistance: Agencies Have Made Limited Progress Addressing Antibiotic Use in Animals*. In particular, we are highly concerned by this portion of USDA's response to GAO:

*“Currently, there is insufficient scientific information available to make important policy decisions regarding use of antibiotics for growth promotion purposes. Such policy decisions may, in some cases as described in the GAO report, actually lead to increased use of antibiotics with unknown potential effects on overall antibiotic resistance and public health.”* (Page 66.)

These comments are inconsistent with the vast majority of published literature spanning the past forty years, as well as the understanding of most medical experts, which conclude that giving important human antibiotics to food animals on a routine basis, especially at subtherapeutic levels such as for growth promotion, contributes to antibiotic-resistant infections in humans. The rising epidemic of antibiotic resistance—recently illustrated by an antibiotic-resistant *Salmonella* outbreak that sickened 129 people and killed one who had eaten ground turkey—and the scientific evidence underlying the contribution of animal agriculture are surely enough cause to justify policy action. Please see the attached letter restating key scientific findings, which many of our organizations recently sent to Congress as well as federal agencies and the White House.

To our dismay, USDA has been inconsistent at best in recognizing and accepting the significant scientific evidence supporting the existence of an overuse of antibiotics in animal agriculture:

- In July 2011, a technical report (“A Focus on Antimicrobial Resistance”, published May 2011) summarizing the robust literature was removed from USDA's website, after disclaimers were first added distancing the agency from the report's author.
- At the May 2011 Future of Food conference at Georgetown University, a questioner asserted that the government should address overuse of antibiotics in food animal production. You responded, “I'm not quite sure. How do you basically legislate that?” Also, “It's not as easy as it appears.”
- At a September 2010 conference of the National Cattlemen's Beef Association, you stated, “USDA's public position is, and always has been, that antibiotics need to be used judiciously and we believe they already are.”

- Yet, in July 2010 House Health Subcommittee hearings, Dr. John Clifford, Deputy Administrator of the Animal and Plant Inspection Service’s Veterinary Services program, testified, “USDA believes that it is likely that the use of antibiotics in animal agriculture does lead to some cases of antibacterial resistance among humans.”

The size and scope of antibiotic resistance and the significant health risk posed by overuse of antibiotics in agriculture are clear and deserve the agency’s recognition and enhanced attention. As Food and Drug Administration officials work to finalize voluntary guidance on the judicious use of antibiotics in food animals, we urge the Department of Agriculture to support and work constructively with FDA as they put together this and related policies. Inconsistent statements from USDA have the potential to undermine efforts of the FDA, the federal agency with the authority to make policy decisions “regarding use of antibiotics for growth promoting purposes.”

We request a meeting with you to discuss this important issue and to seek clarification of USDA’s position. Please feel free to contact Justin Tatham at [JTatham@ucsusa.org](mailto:JTatham@ucsusa.org).

Sincerely,

Alliance for the Prudent Use of Antibiotics  
American Academy of Pediatrics  
American Medical Association  
American Nurses Association  
American Osteopathic Association  
American College of Preventive Medicine  
Catholic Healthcare West  
The Center for Food Safety  
Center for Science in the Public Interest  
FamilyFarmed.org  
Food & Water Watch  
Food Animal Concerns Trust  
Government Accountability Project  
Institute for Agriculture and Trade Policy  
Keep Antibiotics Working  
The National Consumers League  
Natural Resources Defense Council  
Organic Consumers Association  
The Pediatric Infectious Diseases Society  
Society of Infectious Diseases Pharmacists  
STOP Foodborne Illness  
Trust for America’s Health  
Union of Concerned Scientists  
Waterkeeper Alliance

Cc: Melody C. Barnes, Director of the Domestic Policy Council, Executive Office of the President

Edward Avalos, Under Secretary, Marketing and Regulatory Programs, U.S. Department of Agriculture

Dr. John R. Clifford, Deputy Administrator and Chief Veterinary Officer, Veterinary Services, Animal and Plant Health Inspection Service, U.S. Department of Agriculture

Dr. Margaret A. Hamburg, Commissioner, Food and Drug Administration

Michael R. Taylor, Jr., Deputy Commissioner, Office of Foods, Food and Drug Administration