

Oregon Veterinary Medical Association

**House Bill 2598
Oppose**

March 24, 2015

Dear Chair Witt, Vice Chairs Krieger and McLain, and Committee Members:

As medical professionals, veterinarians are concerned about antimicrobial resistance and the possible threats to human, animal, and environmental health. However, regardless of how well-intentioned House Bill 2598 may be, we do not support the legislation for many reasons.


First, federal legislation that will become effective in 2016 answers principal concerns raised in HB 2598, thus rendering the bill as unnecessary.

Veterinarians use antibiotics for food producing animals in three ways:

- To treat certain disease conditions;
- To control certain bacterial infections; and
- With low doses of drugs, to improve growth and efficiency.

The Food and Drug Administration has regulatory oversight of antibiotics administered to food producing animals and has determined that the use of medically important antibiotics for growth promotion purposes in food animals is not judicious. As a result, in a little more than one year from today, federal law will **prohibit** the use of antimicrobials in medicated feed for the purpose of growth promotion, feed efficiency, and weight gain. (In the meantime, medicated feed providers have voluntarily discontinued this practice). This directly answers points raised in Section 1, lines 21 and 22 of the bill.

Another important pending change is that under the FDA's Veterinary Feed Directive, **all** use of feed antimicrobial medications will be under the oversight and order of a licensed veterinarian. This is essential, and we support the federal change.




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Second, the bill identifies “families” of antibiotics but doesn’t provide important context as to how these drugs are used in food production medicine and what implications their use might be.

- The primary antibiotics in medicated feeds are penicillin, chlortetracycline, and oxytetracycline. While these drugs once were commonplace in human medicine, their use today has been significantly reduced in favor of other antibiotics. Why is this important? Given the distinction, there isn’t the direct connection to antimicrobial resistance with this “family” of drugs that is implied in the bill.
- In both human and animal medicine, it is critically important that the full course of taking antibiotics is completed. Yet we know that compliance in both healing art professions sometimes falls short. When human patients don’t meet full compliance as directed by their doctors, we know that can create a resistance to that particular drug. We encounter similar concerns in veterinary medicine, too. For example, pet owners that stop giving their pets the full course of prescribed antibiotics can unintentionally contribute to a resistance of that antimicrobial in their dog or cat.
- With regard to our clients in food production medicine, they are much better with full compliance – adhering to our prescriptive order of antibiotics. There are a couple of reasons for this: 1) Producers want better assurance for a healthy and safe food supply; and 2) They also know they can encounter an economic loss of that animal if that illness or disease condition is not appropriately treated.

Third, the bill establishes a definition of “non-therapeutic purpose” for use of antimicrobials that includes disease prevention.

Does this suggest that veterinarians should *not* treat food-producing animals for potential diseases? If so, this is wholly incompatible with veterinary science. If veterinarians were to adhere to this “requirement,” animal health would be compromised and antibiotic resistance would be encouraged. This is opposite of what proponents of HB 2598 say they want.



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- It is important to understand that food animal medicine is herd health. It is common in production medicine to provide antibiotic treatment of animals when a disease outbreak is expected or is in the beginning stages. If veterinarians were to back off of this experienced and appropriate protocol, they could not effectively control bacterial infections or virulent pathogens during a disease outbreak. Instead, the infections and pathogens would persist, thus increasing the possibility of resistance.
- There are greater restrictions on the use of medications in food-producing animals than in pet medicine. With food production, a veterinarian has no federal or state allowance to deviate from what is indicated for use on the drug's label. **Note:** Labels are very specific in indicating dose, duration, indicated species, and, most importantly, the disease condition or agent.

Veterinarians have the most education and professional experience and judgment with regard to antibiotic efficacy, resistance, and residues in food production. The number of animals to be treated, and the duration of treatment with therapeutic antibiotics should be directed by the trained professional – a licensed veterinarian – and not by a misguided and unnecessary state law.

We ask that each of you also oppose HB 2598. Thank you for your time and consideration.

Sincerely,

Chuck

Chuck Meyer, DVM
President

Note: The Oregon Veterinary Medical Association is a nonprofit professional organization of 1,000 members across all counties in the state and representing all disciplines of the profession, from private clinical practice to public health to education to regulatory medicine and industry.



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