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Changes that the Food and Drug Administration has implemented nationally makes this bill unnecessary

Antibiotic resistance is an important public health threat that requires coordinated effort on the part of all stakeholders. Under the "One Health" umbrella, both human and veterinary users must work together to ensure all uses are judicious. The agriculture community has made and continues to make significant effort to ensure antibiotics are only used when necessary and in the smallest amount necessary to protect animal health. Currently, much of this effort centers around full implementation and compliance with the new FDA policy on the Judicious Use of Antibiotics.

This bill is unnecessary. The Food and Drug Administration, with cooperation from animal health companies and other stakeholders, has implemented a new policy that significantly changes the way antibiotics are used in food animals and is more restrictive in some respects than this bill. The new policy implements two major changes, effective this past January 1:

1. Antibiotics that are in the same class as those used to treat people cannot be used to promote growth in animals. The company labels that are attached to these products have had the claims for growth promotion removed, so growth promotion products are no longer available in the marketplace and it is illegal to used antibiotics to promote growth.
2. All remaining antibiotics used in feed or water will require the supervision of a licensed veterinarian. Products used in water will require a veterinarian prescription; those used in feed will require a veterinarian feed directive (VFD). All remaining uses for treatment, control and prevention are classified by FDA as therapeutic because they are targeted – meaning the label specifies a specific disease or pathogen against which the antibiotic will work.

As a result of this new federal policy, all uses of medically important antibiotics in food animals will be to fight disease under the supervision of a veterinarian.

What the draft bill will <u>not</u> do:

1. It will not achieve its stated goal of protecting public health in Oregon by preserving the effectiveness of antibiotics.
2. It will not reduce antibiotic use in Oregon. Eliminating prevention uses (lower dose) will likely lead to more animal disease outbreaks that requires treatment uses (higher dose).
3. It will not produce meaningful use information that will help producers and veterinarians become better users of antibiotics.

What the draft bill <u>will</u> do:

1. The bill could lead to adverse impacts on animal welfare and food safety. Research shows that keeping food animals healthy makes it more likely food from those animals will be safe and healthful. By unnecessarily restricting antimicrobials in disease prevention programs removing this bill would imperil animal health and food safety.
2. Places a target on the backs of some Oregon producers. Because of the interstate movement of both animals and food products, state-level antibiotic use data is not informative. It is even less useful when collected from only a subset of producers. This bill demonizes large producers by requiring only them to submit use data and then by providing no protection of that data.

Specifics:

1. The list and references in this bill to medically important compounds is out of line with the U.S. Food and Drug Administration. The bill lists cephalosporins, even though that class is used only for therapeutic uses using the injectable route of administration. Further, FDA has its list of medically important compounds which varies somewhat from the WHO list for specific reasons. Production systems in the U.S. are different than those around the world.
2. Section 4 of the bill attempts to prohibit FDA-approved prevention uses. This section creates great confusion for Oregon producers. It prohibits prevention uses that are legal under federal law. It allows administration only for the duration specified by a veterinarian. By federal law, antibiotics used in feed must be used according to both the dose and duration listed on the federally approved label only – neither the veterinarian nor producer can deviate from the label. The inability to prevent disease will lead to more animal disease and require more use of higher-dose treatment options. The federally-approved labels for prevention of disease are considered therapeutic because they are targeted – the label specifies either a disease or pathogen that must be present in the judgment of the veterinarian before the product can be administered.
3. We support data collection that is done for a stated purpose, helps to inform producers and veterinarians on their use of antibiotics, and protects individual producer confidentiality. The U.S. Department of Agriculture has a program that meets these standards. That program is supported by the agriculture community, which has lobbied for funding to support it. Species groups are also collecting data on a voluntary basis and will provide that data to USDA to use in their program.
4. The bill quotes the World Health Organization calling for "urgent, coordinated action by many stakeholders." Coordinated action in agriculture is taking place through the mechanism of the new FDA Judicious Use policy. One state acting alone will not have an impact other than to harm producer in that state. WHO believes national and international coordination is needed and those efforts are underway.
5. Nowhere has U.S. FDA or CDC singled out "routine use of antibiotics for both disease prevention and growth promotion on industrial farms" as a cause of antibiotic resistance in humans. These agencies have stated that all uses can contribute to the problem. This bill is a punitive attack on certain types of farms that will not address the issue of antibiotic resistance.

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