

My name is Mike Russo, Federal Program Director with the U.S. Public Interest Research Group (U.S. PIRG). We're a consumer group that stands up to powerful special interests on behalf of the public's health and well-being. As you finalize your report on the critical issue of increasing antimicrobial resistance, we urge you to include recommendations to rein in the overuse of antibiotics on livestock.

The decreasing effectiveness of antibiotics poses dangers for the millions of Americans who rely on them every year to treat everything from a simple ear infection, to strep throat, to serious and potentially life-threatening illnesses like pneumonia. Much must be done across sectors, by the drug industry, doctors, patients, and all stakeholders to ensure responsible stewardship of these life-saving drugs. But while some of these steps present difficult tradeoffs, curbing the overuse of antibiotics in agriculture presents a straightforward case for action.

While reliable statistics are hard to come by, the best estimates are that 70 percent of all antibiotics in the U.S. are sold for use on livestock and poultry. Farming operations routinely mix large amounts of low-dose antibiotics into the feed of healthy animals, not to treat specific diseases, but to increase overall yields. Whether labeled as growth promotion or disease prevention, the result is the same – an increased likelihood that bacteria will develop resistance and our life saving medicines won't work.

Antibiotic overuse on livestock can impact human health in a variety of ways. As we've seen in the ongoing Foster Farms salmonella outbreak, antibiotic-resistant bacteria can exit the feedlot and make humans sick with hard-to-treat food-borne infections. And there is increasing evidence that on-farm resistance can transfer to human-affecting bacteria through other pathways as well.

While it is impossible as of yet to know how much of the antibiotic-resistance crisis is traceable to overuse on livestock, the stakes are high – each year, at least 2 million Americans become infected with antibiotic-resistant bacteria, and at least 23,000 people die as a direct result of these infections.

Last December, the FDA put out limited, voluntary guidelines related to antibiotics and animals, but we are concerned that they will not meaningfully change the status quo, since pharmaceutical companies can comply by simply relabeling their drugs as intended for prophylactic disease prevention, rather than growth promotion. It is not the label on the drug, but the practice of large-scale, low-dose use of antibiotics that poses a threat to public health, and the FDA's current approach would not end and potentially would not even meaningfully reduce this practice. In fact, when the new guidelines were announced, a spokesperson for Zoetis, one of the largest makers of veterinary drugs, told the New York Times that the FDA's action was unlikely to have much effect on their revenues, since its antibiotic products are also approved for disease prevention.

We urge you to include as part of your recommendations substantial steps to eliminate the overuse of antibiotics in livestock operations. Humans are given antibiotics only when there is need to treat a specific illness, and we're given a limited-time dose at sufficient strength to end the infection. These are the basic principles of stewardship, and livestock operations shouldn't be permitted to flout them.

The public understands that this is a common-sense step – we've gathered 50,000 petitions to the FDA this summer calling on them to take further steps. So do doctors and public health professionals, 2,000 of whom have endorsed this campaign. Please add your voices to theirs by including strong recommendations on livestock overuse in your report.

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