

July 3, 2012

The Honorable Debbie Stabenow
Chair
Committee on Agriculture
United States Senate
328 A Russell Senate Office Building
Washington, DC 20510

The Honorable Herb Kohl
Chair
Subcommittee on Agriculture
Committee on Appropriations
United States Senate
S-128 U.S. Capitol Building
Washington, DC 20510

The Honorable Pat Roberts
Ranking Member
Committee on Agriculture
United States Senate
328A Russell Senate Office Building
Washington, DC 20510

The Honorable Roy Blunt
Ranking Member
Subcommittee on Agriculture
Committee on Appropriations
United States Senate
S-128 U.S. Capitol Building
Washington, DC 20510

Dear Chairs Stabenow and Roberts and Ranking Members Kohl and Blunt:

The undersigned organizations represent a broad array of interests involved in producing food from livestock and poultry, ranging from those who raise the animals to the processors, veterinarians, feed suppliers and animal health product and technology companies that make up this important segment of agriculture. Our members are involved in producing meat and poultry products that come from all of the various production systems to meet consumer demand for choice, wholesomeness and affordability.

We are writing to share our perspective regarding a recent report by Consumers Union on the use of antibiotics in food animal production. In its report, Consumers Union says it stands for “a food system that assures food is safe, affordable, healthful and processed in a sustainable manner.” We could not agree more and would like to tell you why we agree.

We strongly believe consumers deserve a choice when it comes to their meat and poultry purchases. However, consumers can make an informed choice through balanced information about the challenges, benefits and realities of the various approaches to raising and processing livestock and poultry. We do not believe it serves the consumer to stigmatize certain production systems to boost others.

Unfortunately, Consumers Union’s recent actions, no matter how well intentioned, are working against this mission. Calling for “Meat Without Drugs” to eliminate the use of antibiotics in farm animals may sound like a good idea, but the very title of the campaign is misleading and meant to inflame. Our U.S. meat and poultry supply is “without drugs.” Livestock and poultry are sometimes treated with antibiotics to prevent, control and treat diseases, but strict withdrawal

periods must be followed to ensure that no residues are contained in the products we consume, and federal data shows that the system works. Blanket actions to restrict antibiotic use would actually make our food system less safe, limit our ability to prevent, control and treat disease, and hurt countless animals. We agree there needs to be dialogue about the use of antibiotics in farm animals, but we stand firm that antibiotics, when used properly and under the oversight of a veterinarian, are critical to making food safe.

All livestock and poultry production systems, including organic, natural, conventional or biotechnology methods, come with unique sets of issues that the animal agriculture industry must address to achieve its primary objective: a commitment to consumers to provide safe, wholesome and affordable food. By realizing this goal, we ensure that consumers, no matter what production system they choose to support with their food dollars, have confidence in the safety and nutrition of their meat and poultry purchases, particularly for those consumers for whom affordability is the primary concern.

It is important to recognize that these various production approaches are not independent of each other – in some instances, these different systems are actually interdependent. Most antibiotic-free animal production systems, for example, work in tandem with conventional systems. This allows for the appropriate and humane care of animals that get sick. Without this interdependence, a producer's only option when an animal from his or her antibiotic-free production system becomes ill, would be to let the animal suffer – which is clearly not appropriate – or to euthanize and dispose of the animal. Conversely, when systems are working in tandem, the sick animal can be treated with medicines, including antibiotics, and then moved into a conventional system when its health is restored and Food and Drug Administration (FDA) required withdrawal time has elapsed, meaning the medicine has cleared the animal's system.

A commitment to long-term human health is our first priority, but it is important to work together to examine the facts, practices and safety in question instead of trying to force a misguided “one size fits all” solution that does not tell the whole story.

To assist your understanding of our industry and our commitment to consumers' desires and demands, we would appreciate the opportunity to visit with you or your staff. In that vein, the following information is provided in response to just a few of the assertions made in one paragraph of Consumers Union's report, in order to give you a perspective that is based on the best available science and grounded in common sense business principles.

From the Report: Some 80 percent of all antibiotics sold in the United States are used not on people, but on factory farm animals, to make them grow faster and to prevent disease in crowded and unsanitary conditions. This is creating “superbugs” on farms to which humans are being exposed and causing life-saving drugs to become less effective.

Assertion: 80 percent of all antibiotics sold in the United States are used not on people...

Reality: There is no comparable human and animal data that makes such an analysis possible. Fully 40 percent of the animal antibiotics counted are compounds not used in human medicine, and therefore, their use in animals cannot be compared with those used in humans. FDA has outlined this point in letters to Congress that list several reasons the data cannot be compared and used in this manner.

Assertion: *...but on factory farms...*

Reality: The antibiotic sales data used in the report comes from manufacturers and refers to all antibiotics sold, regardless of the type of operation on which they are used. More to the point, 97 percent of all farms in the United States are family-owned, not corporate factories.

Assertion: *...to make them grow faster and to prevent disease...*

Reality: Antibiotics are approved by FDA for use in four specific and discrete ways: treatment of disease, control of disease, prevention of disease and growth promotion/feed efficiency. Treatment, control and prevention of disease are defined as therapeutic uses because they target a specific bacteria or a specific disease. The only data indicating how much is used for growth promotion/feed efficiency comes from an Animal Health Institute survey last conducted in 2007, which indicates only 13 percent of the total used was for growth promotion/feed efficiency.

Assertion: *...in crowded and unsanitary conditions...*

Reality: This often repeated assertion simply defies logic from an economic and good animal husbandry standpoint. It can cost producers hundreds of thousands of dollars to erect indoor facilities – facilities designed by experts giving careful consideration to promote productivity by helping minimize economic losses caused by disease and the associated necessary treatment of sick animals.

Much of animal production has moved indoors because it enhances producers' ability to separate animals from their waste, protect them from predators and other disease-carrying wildlife, and shield them from the extremes of weather. Stocking densities in these facilities have been based on scientific analysis to optimize animal health and productivity. To address animal well-being in the long run, the advantages of current housing systems should be retained while making improvements to overcome problems identified. Additionally, producers work with veterinarians and other animal health professionals to monitor and manage disease risks, which not only minimize the medicine and treatment labor costs but also contribute to producing safe, wholesome livestock and poultry for the food processing sectors.

One specific example is that indoor confinement in the pork industry has allowed producers to virtually eliminate trichinosis and toxoplasmosis, diseases that research has shown are re-emerging and pose a challenge to production systems where animals are more readily exposed to outdoor pest and disease risks. This also demonstrates the tradeoffs involved in different production systems, tradeoffs that producers must carefully consider and manage to meet food safety and production goals.

We have been encouraged by the significant changes taking place in the regulation of antibiotics. FDA has initiated a process to extend veterinary oversight of medically important antibiotics used in animal agriculture, which includes elimination of the growth promotion uses of these compounds. The net result of this process will be to place medically important antibiotics used in agriculture under the supervision of a licensed veterinary medical professional and use them only for therapeutic purposes. Our members are working with FDA to enact these changes and believe these efforts work to address consumers' calls for the elimination of growth promotion uses.

Just as importantly, our members strongly believe in and understand the importance of strict adherence to prescribed withdrawal periods when using antibiotics to prevent antibiotic residues in meat and poultry. This belief is supported by Department of Agriculture (USDA) residue monitoring data, which show an extremely high degree of compliance and very low incidence rate of residue violations.

Finally, the issue of antibiotic resistance is scientifically complex and cannot be addressed with simple solutions – at best, such solutions are ineffective and in some situations, could make the problem worse. The Danish experience should serve as a lesson about the complexity of this issue. A 2011 General Accounting Office Report stated: “Danish officials told us that Denmark’s resistance data have not shown a decrease in antibiotic resistance in humans after implementation of the various Danish policies [to ban animal antibiotic uses], except for a few limited examples.” For your review, we have enclosed a letter sent to Rep. Louise Slaughter (D-N.Y.) reviewing the current, best-available science that compares the extremely small risk against the significant benefits of antibiotic use in food animals.

Taking thoughtful approaches to effective solutions also extends to calls for labeling of meat and poultry products. Currently, any label placed on meat and poultry products must be approved by USDA to ensure it is not misleading or deceptive. We would welcome the opportunity to discuss ways to better educate consumers about the information conveyed about antibiotic use in the production of meat and poultry.

As food producers and animal health professionals, our members' focus every day is the care and well-being of their animals to produce a safe and wholesome food product. As food consumers, the same members demand safe and wholesome food for themselves and their families. All production systems have food safety and animal health challenges, and our members work hard to meet those challenges and remain committed to providing the best and safest possible food product.

Sincerely,

American Association of Bovine Practitioners
American Association of Small Ruminant Practitioners
American Association of Swine Veterinarians
American Farm Bureau Federation

American Feed Industry Association
American Meat Institute
American Veterinary Medical Association
Animal Agriculture Alliance
Animal Health Institute
National Cattlemen's Beef Association
National Chicken Council
National Grain and Feed Association
National Milk Producers Federation
National Pork Producers Council
National Turkey Federation
North American Meat Association
U.S. Poultry & Egg Association

[Enclosure]

CC: Senate Committee on Agriculture
Senate Committee on Appropriations Subcommittee on Agriculture