



CENTER FOR FOOD SAFETY

March 16, 2017

Senate Committee on Health Care
Oregon State Legislature
900 Court St NE
Salem, OR 97301

Re: Comments by Center for Food Safety on SB 785, “Relating to protecting antibiotics for human public health; and declaring an emergency.”

Center for Food Safety (CFS) is a nationwide nonprofit public interest organization with a mission of empowering people, supporting farmers, and protecting the earth from the harmful impacts of industrial agriculture. Through groundbreaking legal, scientific, and grassroots action, CFS protects and promotes the public’s right to safe food and the environment. CFS has more than 830,000 consumer and farmer advocates across the country, including thousands of Oregonians. CFS has a specific program addressing the harmful health and environmental impacts of factory farms, including improving oversight of animal feed and drugs, and has long worked on the issue of antibiotic overuse and antibiotic resistance, at the federal and state levels.

CFS strongly urges members of the legislature to support SB 785. By establishing a prohibition on the use of medically important antimicrobials in food animals for production purposes, including growth promotion, weight gain, feed efficiency and disease prevention, SB 785 helps to safeguard the health of Oregon’s citizens against a public health crisis exacerbated by poor animal production practices.

It is well accepted by the scientific community that unnecessary over-use of antimicrobial agents in industrial animal production is a threat to the health of people, animals, and the environment.¹ Such use promotes unethical and unsanitary conditions, by enabling producers to routinely use antimicrobials in lieu of management practices that promote animal health and welfare. Unfortunately, antimicrobials are not only routinely given to healthy animals to promote weight gain and feed efficiency, but also to keep those animals healthy in crowded confinement

¹ European Medicines Agency Committee for Medicinal Products for Veterinary Use & European Food Safety Authority Panel on Biological Hazards. 2017. “EMA and EFSA Joint Scientific Opinion on measures to reduce the need to use antimicrobial agents in animal husbandry in the European Union, and the resulting impacts on food safety (RONAFA),” *EFSA Journal*, 15(1) (January), available at: <http://onlinelibrary.wiley.com/doi/10.2903/j.efsa.2017.4666/full>; E.K. Silbergeld, K. Ellen, J. Graham, & L.B. Price. 2008. “Industrial Food Animal Production, Antimicrobial Resistance, and Human Health,” *Annu. Rev. Public Health*, 29; E. Aarestrup. 2012. “Get pigs off antibiotics,” *Nature*, 486 (28 June).

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conditions, rather than provide animal welfare measures like access to outdoor, sunlit spaces, and lower stocking densities, which may be more costly.

SB 785 serves to remove one of the hazardous tools that have supported the intensification of food animal production. It is an important step toward achieving needed reforms in the food animal industry, reforms that hold producers accountable for the impacts of their operations on public health, animals, and the environment.

Banning the use of medically important antibiotics for non-therapeutic purposes addresses a mounting public health crisis.² International health agencies agree that the over-use of antimicrobials in agriculture has major implications for the spread of antibiotic-resistant disease and “super bugs” that directly threaten human health.³ The CDC estimates that each year, 2 million Americans become infected with antibiotic-resistant bacteria and at least 23,000 die as a result. Last year, bacteria resistant to colistin⁴ and carbapenems⁵, medicines considered the last resort for infections, were found in the U.S. Medical organizations like the American Academy of Pediatrics⁶ and the Society of Infectious Diseases Pharmacists⁷ have stressed the need to eliminate the routine use of antibiotics on livestock and poultry to keep these medicines effective.

Large animal factories are a significant contributor to the spread of antibiotic resistance. In fact, up to 70 percent of medically important antibiotics sold in the United States are for use on livestock, and not primarily to treat sick animals. Instead, antibiotics are put into the daily feed of healthy animals to prevent disease in animals that are not sick. As a result, bacteria commonly present on farms are evolving into stronger, antibiotic-resistant strains. These germs, sometimes called “superbugs,” can then find their way to the human population through numerous pathways, including contaminated food, airborne dust blowing off farms, and water and soil polluted with contaminated feces. This threat requires strong government action that will enforce reductions in antibiotics used in agriculture.

² J. O’Neill. 2016. *Tackling Drug-Resistant Infections Globally: Final Report and Recommendations*. Report of the United Kingdom Review on Antimicrobial Resistance (May).

³ World Health Organization. 2015. *Global Action Plan on Antimicrobial Resistance*. WHO Press: Geneva, Switzerland.

⁴ R.J. Meinersmann, S.R. Ladely, J.R. Plumblee, M.C. Hall, S.A. Simpson, L.L. Ballard, B.E. Scheffler, L.L. Genzlinger, & K.L. Cook. 2016. “Colistin Resistance *mcr-1*-Gene-Bearing *Escherichia coli* Strain from the United States,” *Genome Announcements*, 4(5) (September/October): pp. 1-2, available at: <http://genomea.asm.org/content/4/5/e00898-16.full>.

⁵ D.F. Mollenkopf, J.W. Stull, D.A. Mathys, A.S. Bowman, S.M. Feicht, S.V. Grooters, J.B. Daniels, & T.E. Wittum. 2016. “Carbapenemase-producing *Enterobacteriaceae* recovered from the environment of a swine farrow-to-finish operation in the United States,” *Antimicrobial Agents and Chemotherapy*, Accepted Manuscript (posted online 5 December), available at: <http://aac.asm.org/content/early/2016/11/15/AAC.01298-16.abstract>.

⁶ See note ii.

⁷ Samuel L. Aitken et al., 1 April 2016, “Agricultural Applications for Antimicrobials. A Danger to Human Health: An Official Position Statement of the Society of Infectious Diseases Pharmacists,” *Pharmacotherapy: The Journal of Human Pharmacology and Drug Therapy*.

To protect antibiotics and combat the spread of drug-resistant bacteria, antibiotics for food animals should be used sparingly and only on sick animals or to contain verified disease outbreaks. Unfortunately, federal regulation has failed to meaningfully address the non-therapeutic uses of antimicrobials to protect human health and the environment. Thus, States like Oregon must step into the breach and lead the way. Oregon can implement measures that more adequately protect their citizens and contribute to significant reductions in the use of antimicrobials in food animals. To date, federal actions have targeted only growth promotion and feed efficiency uses of medically important antibiotics, and have failed to address disease prevention.⁸ Worse, the only federal action thus far is in the form of a guidance, a non-legally binding document. Much more is needed, in the form of legally binding requirements on producers. The evidence bears this out: Even as producers and drug companies were aware of Guidance 213 coming into effect and growth promotion indications being eliminated, sales of medically important antibiotics increased nationally every year, illustrating that more must be done to address antibiotic use and resistance.

Prohibiting the use of medically important antimicrobials for routine disease prevention within the state of Oregon sets a much needed precedent for action. California was the first to pass legislation of this kind, legislation that CFS supported and worked to pass there. Leadership from Oregon is similarly needed to create critical change, achieve actual reductions in on-farm use of medically important antimicrobials, and preserve the efficacy of important medicines against harmful pathogens.

SB 785 also increases efforts to hold concentrated animal feeding operations (CAFO) operations accountable by gathering much needed data on antimicrobial use by large-scale facilities. Presently, we lack any data on actual patterns of use for antimicrobials in livestock and rely entirely on annual sales data reported by drug companies. This bill, coupled with similar data collection mechanisms forthcoming in California, will begin to give us an accurate picture of how large-scale producers use antimicrobials, for what purposes, in what amounts, and for what durations. This transparency is vital: Without a clear picture of these patterns, it is impossible to create strategies and reforms that will result in actual reductions in use. Additionally, without baseline data we have no way of knowing whether policies are effective in driving reduced use.

By prohibiting the use of medically important antimicrobials for all production purposes, including disease prevention, and establishing data collection requirements for CAFOs, SB 785 will establish Oregon as a leader in protecting public health and food safety. Its passage will help turn the tides nationally, augmenting efforts to preserve important human medicines and catalyzing critical changes in food animal production. Healthy humans aren't supposed to take antibiotics; neither should healthy farm animals. We strongly urge you to pass SB 785.

⁸ U.S. Food and Drug Administration. 2013. Guidance for Industry #213, New Animal Drugs and New Animal Drug Combination Products Administered in or on Medicated Feed or Drinking Water of Food-Production Animals: Recommendations for Drug Sponsors for Voluntarily Aligning Product Use Conditions with GFI #209, available at: www.fda.gov/downloads/AnimalVeterinary/GuidanceComplianceEnforcement/GuidanceforIndustry/UCM299624.pdf.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'G Kimbrell', with a stylized flourish at the end.

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