



TESTIMONY

Senate Committee on Health Care

Thursday, March 16, 2017

Farmers and Ranchers Oppose SB 785 and the -1 Amendment

Thank you for the opportunity to provide testimony in response to SB 785. Our coalition of animal producers opposes SB 785 and the -1 amendment. We acknowledge that antibiotic resistance is a serious threat to public health and, in response, we have joined with federal agencies and the human and public health communities to help preserve the effectiveness of antibiotics.

SB 785 is the wrong approach to combat antibiotic resistance. In 2013, the Centers for Disease Control and Prevention (CDC) published a report, "[Antibiotic Resistance Threats in the United States](#)," finding that out of 18 threats to antibiotic efficacy, only two were considered food-borne threats. Since publication of the CDC report, significant steps have been taken to bring the use of antibiotics used in food-producing animals under a *Judicious Use* policy. SB 785 is unnecessary considering the yeomen's work to address the responsible use of these medicines on the farm and support food safety.

SB 785 duplicates federal efforts to reform antibiotic use on the farm

SB 785 is a solution in search of a problem. In 2013, the U.S. Food and Drug Administration (FDA) initiated efforts to promote the *Judicious Use* of antibiotics in food-producing animals. These efforts included modifying the FDA-approved label to eliminate production uses (i.e. growth enhancement and feed efficiency) and bringing the remaining therapeutic uses—disease treatment, control and prevention—under veterinary oversight. These rules were implemented at the beginning of this year, changing how antibiotics are used by Oregon's family farmers and ranchers:

- In December 2016, efforts to change animal pharmaceutical labels to eliminate production uses were finalized. Manufacturers posted transition statements on the label (below), which are in effect today:

Beginning Jan. 1, 2017:

This product will require a veterinary feed directive issued by a licensed veterinarian and will be subject to the following restriction:

*"Caution: Federal law restricts medicated feed containing this veterinary feed directive (VFD) drug to use by or on the order of a licensed veterinarian."**

This product will no longer be approved for the indication of: increased rate of weight gain and improved feed efficiency, which means the use of this product for these purposes will no longer be legal after that date.

*21 CFR 555.6 (a)(6)



- FDA's [Veterinary Feed Directive](#) (VFD) went into effect on January 1, 2017, requiring veterinary oversight of medically important antibiotics (used in human and animal health) administered through feed or water. As medical professionals, veterinarians have the expertise to maintain the efficacy of antibiotics for animal health. The VFD gives veterinarians the flexibility to support animal health while ensuring oversight in adherence to nationally consistent principles of stewardship.

SB 785 is unnecessary and duplicative considering FDA actions to bring the use of antibiotics under a *Judicious Use* policy, while still providing producers with the flexibility to support animal health.

SB 785 requires costly data collection without a clear objective

Antibiotic resistance is a complex problem driven by many interconnected factors. Nationally, there are efforts underway to collect information to help better understand how antibiotics are used in human and animal health and to track resistance patterns:

- U.S. Department of Agriculture (USDA) has an action plan to collect data on the agricultural use of antibiotics: **National Animal Health Monitoring System (NAHMS)**. NAHMS will collect information on the amount of use for different species on a rotating basis and include longitudinal studies to correlate use patterns with resistance patterns. The animal agriculture community is voluntarily gathering data to assist USDA's effort—this is only possible due to USDA protocols that protect the *confidentiality* of that data.
- FDA has a robust antibiotic surveillance program to measure resistance: **National Antimicrobial Resistance Monitoring System (NARMS)**. This program includes the collection of samples from humans, animals and retail meats to measure the level of resistance. The FDA recently released the [NARMS Integrated Report: 2014](#), noting many encouraging trends, including *Salmonella* and *Campylobacter* prevalence at their lowest levels since NARMS testing began.

In contrast to NAHMS and NARMS, SB 785 proposes onerous data collection without establishing a policy objective. Section 6 would create a paperwork nightmare for family farmers, requiring reporting of antibiotics administered to farm animals without consideration of resistance trends or the protection of confidential business information. In light of ongoing efforts at the national level, we believe that Section 6 reporting requirements are a waste of state resources, particularly in this tough budget cycle.

SB 785 creates an uneven playing field for family farmers and ranchers

FDA's *Judicious Use* strategy will help preserve antibiotic efficacy and maintain a level playing field for Oregon's farm and ranch families. SB 785, in contrast, would create state-specific requirements that would limit the availability of medicines that are used to support animal health and reduce mortality, particularly for young animals. Oregon-specific regulations reduce the competitiveness of our producers and disrupt federal actions intended to phase out the use of antibiotics for growth promotion. In Oregon, 80% of commodities are exported nationally and internationally. SB 785 would increase the cost of food production and put the state's livestock and poultry producers at a competitive disadvantage.

SB 785 jeopardizes animal health and welfare

Farmers and ranchers, no matter their method of production, care deeply for the health and well-being of their animals. In fact, U.S. [organic standards](#) explicitly state: "*the producer of an organic livestock operation must not...withhold medical treatment from a sick animal in an effort to preserve its organic status. All appropriate medications must be used to restore an animal to health when methods acceptable to organic production fail.*" Supporting animal health on the farm is an animal welfare issue. Oregon's food producers face an increasing amount of pressure not to treat sick animals. Still, animal welfare should not be compromised by activist pressure. It is for this reason that we oppose SB 785.

We respectfully ask you to vote 'NO' on SB 785 and the -1 amendment. This bill is unnecessary considering FDA's *Judicious Use* strategy and would jeopardize animal health and welfare on the farm. Thank you for the opportunity to provide testimony today.