

March 16, 2017

TO: Senate Committee on Health Care
FR: Charlie Fisher, State Director, Oregon State Public Interest Research Group (OSPIRG)
RE: Support for Senate Bill 785

OSPIRG supports SB 785.

OSPIRG represents tens of thousands of Oregonians around the state. For the past several years, we've knocked on tens of thousands of doors, talking to people about the overuse of antibiotics on farms. People of all political stripes and from all across the state overwhelmingly support reducing the routine use of antibiotics on farms. I want to share two anecdotes our members have shared with us about this issue:

Elizabeth Langston who lives in Eugene shared the experience of her father. She couldn't be here, but asked me to relay her story:

"My dad had both MRSA and Acinetobacter pneumonia. Both are huge superbugs formerly susceptible to fluoroquinolones. He was given a combination of Vancomycin and Meropenem, both high-powered antibiotics that had the potential to cause significant negative side effects, especially to his kidneys. Fortunately, these antibiotics worked, and my dad survived. I wasn't the only one who was beyond scared. The staff knew full well the gravity of the situation."

Another one of our members from Medford described the experience of his girlfriend suffered a spine infection. As a result of the infection, she was in the hospital for 10 days, then rehab for a month, and had to have something put in her arm to continue administering antibiotics for another six weeks.

These are just a tiny sample of the many real consequences of antibiotic resistant bacteria. If, by taking action, we could prevent even one person from experiencing a situation like this, it would be worth it. In this case, the very effectiveness of our antibiotics are at stake.

We urge you to support Senate Bill 785.

SUMMARY OF THE FACTS AND OF SB 785

1. Antibiotics in danger. Medical authorities in the U.S. and worldwide warn that we are in danger of losing antibiotics. CDC estimates that 2M Americans get sick and 23,000 die annually from antibiotic resistant infections. The UK government estimates that without a course correction, annual worldwide deaths from such infections will rise from 700,000 today to 10M by 2050, more than the annual amount of deaths from cancer today.

2. The cause is overuse of these drugs. When used too often, especially at low dosages and extended durations, antibiotics select for resistant bacteria.
3. Overuse on animals is a big part of the problem. Overuse occurs among both humans and animals, but more so on animals than humans. 70% of medically important antibiotics sold in the U.S. are sold for use on food-producing livestock and poultry, often on animals that are not sick. Instead, farm animals are often routinely fed low doses of antibiotics in their daily water and feed to prevent disease due to unsanitary conditions, poor diets and the resulting compromised immune systems that occur on industrialized farms. In addition, from 2009 to 2015, salesⁱ of medically important antibiotics for use in animals increased by 26%.
4. Overuse on farms is linked to human resistant infections. These practices breed antibiotic-resistant bacteria that migrate into the human population. A Consumers' Union literature summaryⁱⁱ and recent studies published in Natureⁱⁱⁱ and Frontiers in Microbiology,^{iv} and 2015 data published in the Proceedings of the National Academy of Science provide ample evidence that overuse of antibiotics on farms contributes to antibiotic resistance in public.
5. Solution: a hard stop to all routine use of medically important antibiotics on farm animals for any purpose: growth promotion, disease prevention and so forth. Farmers should be able to continue treating sick animals with antibiotics, and have the ability to take some preventative measures in the event of an outbreak – but not as a routine matter.
6. The federal government's action on this matter fall short. Recently enacted FDA guidance restricts antibiotics used solely for the purposes of growth promotion, while continuing to allow all other routine overuse of antibiotics. Growth promotion is just one small way in which antibiotics are overused. There are several reasons why the FDA guidelines are inadequate
 - a. **Pharmaceutical companies do not believe the FDA's recommendations will meaningfully reduce sales of antibiotics.**
 - i. In a presentation to shareholders, the CEO of Zoetis, the largest animal health company in the country, claimed, "Zoetis supports the U.S. FDA's efforts, and ... we don't expect this to have a material impact on our future financial results."^v
 - ii. The president of the animal health division of Eli Lilly, the fourth largest animal pharmaceutical company in the country, stated "we do not see this announcement being a material event."^{vi}
 - iii. According to Bimeda, another animal pharmaceutical company, "growth uses of medically important antibiotics represent only a small percentage of overall use, so even if all other factors are static it's unlikely overall use would be greatly affected" by the new FDA guidelines.^{vii}
 - b. **Experience with similar rules in Europe shows that the FDA guidelines likely won't reduce antibiotic use on farms.**
 - i. From 1972 to 2006, European regulators took action similar to the FDA's by banning the practice of feeding antibiotics to animals for "growth promotion." In the

Netherlands – which keeps records of antibiotic consumption – the total use of antibiotics fed to animals did not decline because farms increased the antibiotics fed to animals for “disease prevention.”^{viiiix} In 2011, the European Parliament adopted a resolution stating that the ban was insufficient to protect human health from the overuse of antibiotics.^x

- ii. With the ban on antibiotics for growth promotion failing to reduce the overuse of antibiotics on factory farms, the Netherlands enacted regulations, embraced by industry, calling for a 70 percent decline in antibiotic consumption by 2015. As a result, the amount of antibiotics fed to animals for therapeutic uses, such as disease prevention, dropped by more than 50 percent over five years.^{xi}
- iii. From 1994 to 1999, Denmark took a series of steps that led to a ban on the practices of feeding animals antibiotics for “growth promotion” and “disease prevention.” Consequently, farmers adopted better practices to prevent disease, such as allowing piglets to nurse longer before being weaned. As a result, from 1992 to 2008, use of antimicrobials declined 51 percent on pig farms while pork production increased 47 percent, and antimicrobial use declined 90 percent on chicken farms, even as production increased slightly.^{xii}

7. Key Elements of SB 785:

- a. Prohibition. SB 785 prohibits use of all medically important antibiotics for disease prevention. SB 785 still allows farms to treat sick animals with antibiotics, treat healthy animals to control the spread of a disease that is on the farm premises, and in connection with medical procedures and surgery.
- b. Reporting. The bill also requires EPA-defined ‘large CAFOs’ (which comprise a little over 100 of the largest farms in Oregon) to submit an annual report itemizing all their medically important antibiotic use to ODA. This report would be public record.
- c. Enforcement. The bill does not require ODA to do anything other than design and collect the annual reports. The state could do rulemaking if it chose.

ⁱ FDA: [Antimicrobials Sold or Distributed for Use in Food-Producing Animals](#)

ⁱⁱ Consumers Union: [The Overuse of Antibiotics on Food Animals Threatens Public Health](#)

ⁱⁱⁱ Nature: [Microbiological effects of sublethal levels of antibiotics](#)

^{iv} Frontiers in Microbiology: [Learning from agriculture: understanding low-dose antimicrobials as drivers of resistome expansion.](#)

^v Quote: Zoetis, Inc., Q3 2013 Earnings Call (corrected transcript), 5 November 2013; Largest animal health company: Bob Sperber, "AnimalHealth Pharmaceuticals Are Jumping 22 Why the FDA's Guidelines Are Inadequate the 'Ethical Channel,'" Pharmaceutical Commerce, 2 May 2013.

^{vi} Quote: Mark Bittman, "The F.D.A.'s Not-Really-Such-Good-News," The New York Times, 17 December 2013; Kelsey Gee, "Meat Industry Won't Fight Antibiotics Rule," The Wall Street Journal, 12 December 2013; Fourth largest animal health company in the world: Bob Sperber, "Animal-Health Pharmaceuticals Are Jumping the 'Ethical Channel,'" Pharmaceutical Commerce, 2 May 2013.

^{vii} Bimeda, Effects of FDA's Proposed New Regulations Regarding: "Judicious Use of Antibiotics in Medicated Feed and Drinking Water of Food Animals" (Q&A), February 2014.

^{viii} Europe banning antibiotics for growth promotion in 1972: Carol Cogliani, Herman Goossens, and Christina Greko, "Restricting Antimicrobial use in Food Animals: Lessons from Europe," Microbe, 6(6): 274-279, 2011.

^{ix} Ibid., and Commission on the European Communities, Communications from the Commission on a Community Strategy Against Antimicrobial Resistance, 20 June 2001, 14

^x European Parliament, P7_ TA(2011)0473, Public Health Threat of Notes 23 Antimicrobial Resistance, European Parliament Resolution of 27 October 2011 on the Public Health Threat of Antimicrobial Resistance, 27 October 2011

^{xi} Dik Mevius and Dick Heederik, "Reduction of Antibiotic Use in Animals 'Let's Go Dutch,'" Journal für Verbraucherschutz und 24 Why the FDA's Guidelines Are Inadequate Lebensmittelsicherheit, 9(2):177-181, 19 February 2014; and Autoriteit Diergeenmiddelen, Usage of Antibiotics in Livestock in the Netherlands in 2012, July 2013.

^{xii} Carol Cogliani, Herman Goossens, and Christina Greko, "Restricting Antimicrobial Use in Food Animals: Lessons from Europe," Microbe, 6(6): 274-279, 2011.