

## American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN

Maryland Chapter

The Maryland State Medical Society

1211 Cathedral Street Baltimore, MD 21201-5516 410.539.0872 Fax: 410.547.0915

1.800.492.1056

www.medchi.org

Senate Bill 463 - *Agriculture - Cattle, Swine, and Poultry - Use of Antimicrobial Drugs* Senate Bill 470 - *Agriculture - Antibiotic Drug Usage - Food-Producing Animals* 

> Letter of Information Education, Health and Environmental Affairs Committee March 3, 2015

The Maryland State Medical Society (MedChi) and the Maryland Chapter of the American Academy of Pediatrics (MDAAP) provide this letter of information regarding their position on the use of antimicrobial drugs in animal feed.

Antibiotic resistant bacterial infections are a serious concern for individuals, communities and our health care delivery system. Humans, particularly children and those with reduced immune systems, are at increased risk of acquiring many of these infections with resistant bacteria and are at great risk of severe complications if they become infected. Judicious use of antimicrobial agents in humans will be insufficient to curb the accelerating upward trend in resistance. The largest nonhuman use of antimicrobial agents is in food-animal production. The uses of antimicrobial agents in food-producing animals, if not properly regulated, will have a direct negative impact on human health and multiple impacts on the selection and dissemination of resistance genes in animals and the environment.

In 2012, the Federal Drug Administration (FDA) issued guidance which established principles for judicious use of antimicrobial drugs in the feed and drinking water of food-producing animals. The FDA determined that judicious use of medically important antimicrobial drugs is important to minimize resistance development and preserve their effectiveness as therapies for humans and animals. The 2012 FDA guidance considered the use of antimicrobial drugs in animal feed or water for the treatment, control, and prevention of specific diseases, as uses that are necessary for assuring animal health therefore, making them appropriate uses. The guidance recommends veterinary oversight or consultation.

Further guidance was issued by the FDA in 2013 to assist animal drug manufacturers with labeling changes to bring use into conformity with the 2012 guidance. It is illegal for animal drugs to be used in a manner that is not consistent with drug labeling.

It is critical that use of antimicrobial drugs in the feed and drinking water of food-producing animals be limited to essential judicious uses if we are to curb the accelerating trend in antibiotic resistance that is placing individuals, communities and the health care delivery system at risk. Both MedChi and MDAAP believe it is important that Maryland law be consistent with, and enforce the findings and recommendations of, the FDA's 2012 guidance on judicious use and 2013 guidance regarding drug labeling. It is essential to the protection of the public health.