



September 2, 2020

Office of the Assistant Secretary for Health
U.S. Department of Health & Human Services
200 Independence Avenue, S.W.
Room 715-G
Washington, D.C. 20201

RE: Presidential Advisory Council on Combating Antibiotic-Resistant Bacteria (PACCARB) September 9-10, 2020 meeting public commentary

Dear PACCARB members,

The usage of antimicrobials to combat secondary bacterial infections in the COVID-19 pandemic has further emphasized the importance of these drugs and that antimicrobial resistance remains a top public health threat. U.S. and international public health and regulatory agencies acknowledge that the usage of antimicrobials in agriculture increases the risk of resistance in bacteria that affect humans. As a result, the FDA has taken actions to curb inappropriate uses of antimicrobials in agriculture. These include implementing GFI's #209 and #213, changes to the Veterinary Feed Directive (VFD), and issuing draft GFI #263 that collectively eliminate the usage of antimicrobials for production and growth promotion purposes and bring all medically important antimicrobials under veterinary supervision. In addition, the FDA published the plan "Supporting Antimicrobial Stewardship in Veterinary Settings, Goals for Fiscal Years 2019 – 2023."

While the FDA 5-year plan sets many laudable overarching goals, PACCARB should request that more concrete and timely actions in support and addition to those outlined in the plan be taken to ensure unnecessary antimicrobial use in agriculture is eliminated as soon as possible. These include:

- The elimination of other inappropriate uses of antimicrobials, such as the regular or routine unnecessary mass treatments of animals that are otherwise healthy, or unnecessary empiric treatments for certain conditions.
- The timely release of an integrated antimicrobial resistance report, or of reports containing individual components, which includes human and animal antimicrobial sales and usage data, biomass indicators, and human and animal antimicrobial resistance and illness monitoring data to provide needed evidence to drive further action where warranted.
- The establishment of policy to ensure that duration of use labeling on animal antimicrobial products are set with reference to risk-based principles outlined in GFI #152.

These actions will be crucial to ensuring antimicrobials remain effective for those critical situations when they are needed.

Sincerely,

Center for Science in the Public Interest