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Analysis of a More Restricted Antimicrobial Access (pdf)

Pork Producers and the Issue of Antibiotic Use

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FRAMING THE ISSUE

Is it concern over public health or reaction to “factory farming” that is driving this issue?

Framing the Issue

• “Advocacy” groups using this issue as a rallying point to engage mainstream consumers
• Fear of personal health impacts due to agricultural practices compelling
• Incorrectly tying antibiotic use to farm size and confinement production

What Can Producers Do?

• Serve as a source of information to those with questions
• Serve as a steward of animal health and public health through the responsible use of antibiotics
Serve as a Source of Information

- Regulatory oversight
- Veterinary oversight
- Legislative activities
- Level of risk to public health
- MRSA link to animal agriculture
- Industry programs

Regulatory Oversight

- U.S. Food and Drug Administration
  - Approves all animal drugs (as well as human drugs)
  - Considers risks to human health and the environment when assessing new animal drug applications
  - Inspects commercial feed mills to assure animal antibiotics are used according to regulation
  - Has the authority to withdraw a drug if they feel there is an imminent risk to human health
  - Resistance is different than residues, however residue testing prove good compliance to withdrawals in pigs

Guidance for Industry #209

- The use of medically important antimicrobial drugs in food-producing animals should be limited to those uses that are considered necessary for assuring animal health.
  - Production uses of medically important antimicrobials are considered “injudicious”
  - Disease prevention and control are considered “necessary for assuring animal health”

Veterinary Oversight

- Prescription is not the only way to have veterinary oversight
  - VCPR
  - Herd health programs
- Newer drugs are usually distributed under Rx or VFD
- Strict rules for extra-label, no extra-label for feed
- Larger farms had more veterinary oversight of antibiotic use (NAHMS 2006)

LEGISLATIVE ACTIONS

PAMTA

- Preservation of Antibiotics for Medical Treatment Act
- Introduced for several years (Kennedy, Slaughter)
- Ban “non-therapeutic” uses of seven classes of antimicrobials
  - Non-therapeutic defined as any routine use in healthy animals including disease control and prevention
  - Two years – or if risk assessments by FDA show no risk
  - Reintroduced on March 8, 2011
Hearings, Briefings and Theatrics

- June 2008 - Senate Health, Energy, Labor and Pensions
- September 2008 - House Agricultural Animal Health Subcommittee
  - September 2009 fact finding trip to Denmark
- July 2009 – House Rules Committee
  - FDA Deputy Commissioner first called growth promotion “injudicious”
- Spring/Summer 2010 – Health subcommittee of House Energy and Commerce Committee
- 3 Hearings concluding with “Misuse of Antimicrobials in Animal Agriculture”
  - CDC Director in second hearing said no conclusive evidence of human health impacts to animal antimicrobial use
  - Final hearing – came with three studies that they said provided unequivocal proof
- No action taken on bill in 2010
- Mrs. Slaughter has requested GAO report (due Sept. 2011)

Advertisements in Washington, DC trying to tie foodborne outbreaks caused by products such as spinach, peppers, and peanut butter to the use of antibiotics in pork production

Consumer advocacy groups may ultimately be the Driving factor to Restrict uses of antimicrobials in Animal Agriculture
MRSA

- Specific strain of MRSA has been found in pigs in Europe, Asia, and North America
- No conclusive link to antibiotic use on farm
- Unique strain of MRSA that is less virulent than the hospital acquired strains
- Present in very low levels in retail meat
  – CDC and EFSA say not a foodborne threat
- Producers need to take care to protect their workers from potential occupational exposures

Level of Risk to Public Health

- All uses of antibiotics in human or animal health may select for resistance
- Peer reviewed published risk assessments on the human health risk to use in animal agriculture show very minimal risk
- However, minimal the risk producers work to further minimize the risk through appropriate antibiotic use

Industry Implications

- Regulatory changes more likely than legislative changes
- Social pressures will continue or escalate
- Likelihood that certain products/uses will be lost
- Definition and documentation of veterinary oversight
- Where do industry programs fit in?

Antibiotic Stewardship

Produce Safe Food
- Use management practices consistent with producing safe food
- Manage the health of the herd to produce safe food
- Manage technology to produce safe food

Protect and Promote Animal Well-Being
- Provide feed, water, and an environment that promotes the well-being of our animals
- Provide proper care, handling, and transportation for pigs at each stage of life
- Protect pig health and provide appropriate treatment, including veterinary care when needed
- Use approved practices to euthanize, in a timely manner, those sick or injured pigs that fail to respond to care and treatment

Ensure Practices to Protect Public Health
- Use management practices consistent with producing safe food
- Manage the use of animal health products to protect public health
- Manage manure and air quality to protect public health

Antibiotic Stewardship

- PQA Plus – more than an animal care program
- GPP #1 through 9 – food safety focus
- GPP #3 – Use Antibiotics Responsibly
- On-Farm Assessment
  – Currently assesses Veterinary Client Patient Relationship and Records to Document Withdrawal

PQA Plus GPP #3

- Take appropriate steps to decrease the need to use antibiotics
- Assess the advantages and disadvantages of all uses of antibiotics
- Use antibiotics only when they provide measurable benefits
- Follow the Responsible Use Guidelines
Responsible Use Guidelines

- Use professional input as the basis for all medication decision-making
- Antibiotics should be used for treatment only when there is an appropriate clinical diagnosis
- Limit antibiotic treatment to ill or at-risk animals, treating the fewest animals indicated
- Antibiotics that are important in treating antibiotic resistant infections in human or veterinary medicine should be used in animals only after careful review and reasonable justification
- Minimize environmental exposure through proper handling and disposal of all animal health products, including antibiotics

Conclusion

- Recognize the importance of antibiotics in preserving public health, animal health and the image of the industry
- Demonstrate your commitment to the ethical principles and responsible use through PQA Plus
- Serve as a positive example – the press is looking for negative stories