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Antibiotic Use Data Collection

Addressing the threat of antibiotic resistance requires information on how and why antibiotics are used across One Health settings. For several decades the need for a surveillance system to track antibiotic use on farms has been well recognized. However, a comprehensive system to track the amount and reason for use of antibiotics on farms has not been put in place.¹ This creates a critical gap in our federal capability to track, and prepare for antibiotic resistance as a global health threat.

Recommendation: Secretary Becerra can and should take immediate action to direct the FDA to build a system to comprehensively collect data from the firms that manufacture and distribute animal feeds with medically important (MI) antibiotics mixed into them. The Secretary should request the FDA to submit to his office, no less frequently than every two years, a report analyzing this information for medicated feeds distributed the previous two years. Those reports should be submitted to the Secretary no later than June of the year in question, so as to facilitate their integration into the FDA's annual reporting of antibiotic sales for use in food animals, which occurs in December of each year.

We urge the Secretary request the first such report be submitted to him by June 2022. Given the time frame, this first report might reflect a sampling program that targets areas of food animal production known to have high levels of use of medicated feeds, such as swine and cattle production, but where little public information is currently available. For subsequent reports, however, the aim should be comprehensive collection and analysis of these data. Ideally, the FDA's data collection efforts should include the collection from veterinarians or from animal feeding operations of antibiotic prescription information as well.

¹ The FDA's own Science Advisory Board highlighted the need for on farm antibiotic use data in [2007](#) and [2017](#). The Government Accountability Office has made recurrent recommendations for on-farm data collection in reports issued in [2004](#), [2011](#), and [2017](#). And the 2001 Interagency Task Force on Antimicrobial Resistance, co-chaired by the CDC, the FDA, and the National Institutes of Health, made collection of antibiotic use data and better surveillance a top priority in its [Public Health Action Plan](#).

Why this action is important.

- These data would provide the best available information on how and why most MI antibiotics sold in the United States (by volume) are being used. The latest FDA data indicates two-thirds of all MI antibiotic sales nationally are for poultry or livestock; of these 65% are sold as additives to animal feed, which are then given to entire flocks or herds of animals.² There is no on-farm tracking of how these drugs are currently used.
- This action relies on existing FDA authority and the needed data is already available to the FDA. FDA rules prohibit shipping feeds that contain MI antibiotics without a veterinarian's order ("veterinary feed directive" or VFD) and require feed mills to keep and make available for inspection both the VFDs and records of the feed distributed for two years.³ The combination of feed records and VFDs will provide information on the amount of antibiotics delivered to farms along with the reason for use - both critical pieces of information not supplied by current data collection systems. Veterinarians are also required to maintain records of VFDs written by them.
- Under state law, regulators are collecting and analyzing feed mill data in California and Maryland.⁴ However, a federal approach is preferable for public health protection since medicated animal feeds are distributed across state lines and the integration of these data with antibiotic use and resistance data from other settings should take place at a national level.

For questions or more information please contact:

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² U.S. Food & Drug Administration |Center for Veterinary Medicine. "Annual Summary Report on Antimicrobials Sold or Distributed in 2019 for Use in Food-Producing Animals." FDA, December 15, 2020. <https://www.fda.gov/media/144427/download>.

³ Center for Veterinary Medicine. "Veterinary Feed Directive (VFD)." FDA, February 24, 2021. <https://www.fda.gov/animal-veterinary/development-approval-process/veterinary-feed-directive-vfd>.

⁴ [Maryland](#) is collecting VFD's directly from the veterinarians who issue them for large animal feeding operations, while its law directs [California](#) to collect all VFDs from the state's [149 feed mills](#). Our specific recommendation would be for the FDA collect additional information from the feed distribution records held by these firms, since the latter includes the amount of antibiotic actually added to the feed and distributed to the farm -- which is critical information. By themselves, VFDs as they are sent from veterinarians to feed mills do not always indicate the amount of feed that is manufactured pursuant to that order, and as a result one cannot ascertain the total amount of antibiotic distributed and potentially used in flocks or herds.