

Comments for the Presidential Advisory Council on Combating Antibiotic-Resistant Bacteria (PACCARB)

Keep Antibiotics Working (KAW) appreciates the opportunity to comment to the Presidential Advisory Council on Combating Antibiotic-Resistant Bacteria. We would like to bring to the attention of the Council two gaps in the national response to the crisis of antibiotic resistance:

- 1) **The U.S. Pandemic Preparedness must incorporate robust monitoring on farms and feedlots for zoonotic diseases:** In the recently released, “[American Pandemic Preparedness: Transforming Our Capabilities, and the Upcoming National Biodefense and Pandemic Preparedness Plan](#),” the strategy omits any actions related to tracking or controlling pathogens in animals that have the potential to cause illness in humans. With 3 out of 4 emerging infections arising in animals, there is no possible way to adequately identify emerging pandemic threats without monitoring one of the most important interfaces of human and animal health - farms and feedlots. Among the potential public health threats that originate on farms, antibiotic resistance is of the utmost importance. The spread of resistance occurs across humans, animals, and their shared environment and should be integrated with efforts to monitor for other emerging pathogens with pandemic potential. KAW asks that the Council recommend that federal agencies address zoonotic disease surveillance including antibiotic resistant infections as part of any pandemic preparedness efforts.
- 2) **Antibiotic Use Data should be collected from medicated feed distributors:** Food animals are the biggest consumers of medically important antibiotics in the United States. [The need for a surveillance system](#) that describes what, when, where and how these precious medicines are actually used on U.S. farms and feedlots has been recognized for decades. Feed mills could be an important source of data for this surveillance system. Existing Food and Drug Administration (FDA) rules require feed mills to keep records of the amount of antibiotics distributed to farms and feedlots, the reason for use, and the type of animals receiving them. The rules also require feed mills to make these records available to the agency for inspection and copying. KAW asks that PACCARB recommend that FDA build a system to comprehensively collect data from firms that manufacture and distribute medicated animal feeds that contain medically important antibiotics. FDA should publicly report these data and integrate them with the FDA’s annual reporting of antibiotic sales for use in food animals. Ideally, the FDA’s data collection efforts should include the collection from veterinarians or from animal feeding operations of antibiotic prescription information in order to capture the 35% of antibiotics not administered in feed.

Finally, KAW recommends that the Council examine the “[Comprehensive Review of the WHO Global Action Plan on Antimicrobial Resistance](#)” which identifies serious problems with the World Health Organization’s response to the global health crisis including a lack of a work plan and a failure to adopt a truly One Health approach.