The Center for Science in the Public Interest (CSPI) commends the Centers for Disease Control and Prevention (CDC) for building on its 2001 Action Plan, which outlined specific issues and activities for addressing the threat of antimicrobial resistance (ABR). As CDC recognizes, ABR is no longer an emerging threat, but one that has already emerged and must be effectively managed. CSPI has begun an ongoing project on ABR, and expects to contribute both data and policy suggestions to this important subject moving forward.

The updated Action Plan represents a strong foundation for work on ABR—but we suggest several general improvements to enhance the program’s focus on food safety. In the area of Prevention and Control, CDC should work with USDA to identify ABR-pathogens linked to meat and poultry products and to develop effective monitoring systems for those pathogens. CSPI is considering petitioning USDA to declare certain ABR-strains of Salmonella to be adulterants under the Meat and Poultry Inspection Act, a policy that would allow the agency to better track these pathogens and prevent contaminated products from entering commerce.

CDC should also work closely with FDA and USDA to explore how better to control the over-use of antibiotics in food production. The attached White Paper includes specific data on outbreaks linked to ABR-resistant pathogens in foods ranging from meat and poultry to dairy. It is clear that the widespread and often indiscriminate use of antibiotics in food animals is having a devastating impact on public health, and must be arrested. CDC, USDA, and FDA should develop enhanced protocols for antibiotic use, testing, and evaluation. Where appropriate, we urge the task force to include regulatory action in its recommendations.

We have specific comments on the following goals delineated in the plan:

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1 CSPI is a non-profit consumer advocacy and education organization that focuses largely on food safety and nutrition issues. It is supported principally by the 900,000 subscribers to its Nutrition Action Healthletter and by foundation grants.
• Goal 2.1 (e) addresses the forthcoming publication of several studies related to antimicrobial use in agriculture. We applaud the task force for facilitating these important studies, and look forward to seeing the results in July. We urge the task force to continue collecting and reviewing NARMS data to develop reports on ABR that can be of use in developing sound policies to protect public health.

• Goal 3.5 (c) addresses the need for identification of factors important for ensuring that antimicrobial drugs are used judiciously in veterinary, agriculture, and aquaculture environments. We request that the task force also recommend research to assess the magnitude of alleged benefits of subtherapeutic antimicrobial use and to identify alternative animal husbandry practices that would eliminate the need for antimicrobials.

• Goal 3.7 discusses the need for ongoing education campaigns targeting food producers and food handlers about food safety related to antimicrobials. We appreciate the need for such education, and support the development and dissemination of information (including guidelines and best practices) for antimicrobial use. Such guidelines may help ensure judicious use of over-the-counter antimicrobials by livestock producers and the general public.

• Goal 4.2 discusses the development and promotion of guidelines for appropriate antimicrobial use in agriculture and veterinary settings. We recognize that the task force aims to publish revised draft guidance for public comment this year (2011). As part of this re-evaluation, the task force should recommend phasing out the subtherapeutic use of medically important antimicrobials as soon as possible. Where FDA’s regulatory process for rescinding approvals proves too burdensome, the task force should recommend that Congress either simplify the process or legislate a ban.

We appreciate the opportunity to comment on the updated Action Plan, and look forward to reviewing the work of the Interagency Task Force on Antimicrobial Resistance moving forward. Attached is a White Paper developed by CSPI that may prove of use to the task force in its work.

Sincerely,

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