



National Milk Producers Federation

2101 Wilson Blvd., Suite 400, Arlington, VA 22201 | (703) 243-6111 | www.nmpf.org

Agri-Mark, Inc.
Associated Milk Producers Inc.
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Cooperative Milk Producers Association
Cortland Bulk Milk Producers Cooperative
Dairy Farmers of America, Inc.
Dairymen's Marketing Cooperative, Inc.
Ellsworth Cooperative Creamery
Farmers Cooperative Creamery
FarmFirst Dairy Cooperative
First District Assoc.
Foremost Farms USA
Land O'Lakes, Inc.
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Maryland & Virginia Milk Producers Cooperative Association
Michigan Milk Producers Association
Mid-West Dairymen's Company
Mount Joy Farmers Cooperative Association
Northwest Dairy Assoc.
Oneida-Madison Milk Producers Cooperative Association
Prairie Farms Dairy, Inc.
Premier Milk Inc.
Scioto Cooperative Milk Producers' Association

June 22, 2016

Presidential Advisory Council on Combating Antibiotic-Resistant Bacteria
Bruce Gellin, M.D., M.P.H.
Designated Federal Officer PACCARB
Deputy Assistant Secretary for Health
Office of the Assistant Secretary for Health
Department of Health and Human Services

RE: Request for Information by the Presidential Advisory Council on Combating Antibiotic-Resistant Bacteria (PACCARB)

Dear Advisory Council Members:

The National Milk Producers Federation (NMPF), based in Arlington, VA, develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 32,000 dairy producers on Capitol Hill and with government agencies.

NMPF appreciates the opportunity to provide input to the Presidential Advisory Council on Combating Antibiotic-Resistant Bacteria through this *Request for Information*ⁱ on this important topic. Among the measures available to treat and prevent the outbreak and spread of animal diseases among the nation's dairy cattle, the judicious and responsible use of antimicrobial drugs has a positive impact on animal health and well-being while maintaining a safe milk supply for the public. As requested, NMPF is commenting on Questions 1, 4, and 5 which are most pertinent to the U.S. dairy industry.

Question 1: Describe how organizations are influencing curricula regarding primary prevention (antibiotic stewardship, infection prevention, and control). Please include information about certification examinations, requirements, and continuing education, if relevant.

The dairy industry's National Dairy FARM Program: Farmers Assuring Responsible Management™ (FARM Program) is an on-farm education, evaluation, and verification program designed to help dairy farmers assure high standards in animal care and well-being. First, the FARM program details animal care guidelines in the *FARM Animal Care Reference Manual*ⁱⁱ that farmers must follow for every calf and cow on the farm – guidelines that evolve with the latest research on quality animal care. The manual, and corresponding training videos, detail the highest standards for animal care when it

comes to animal health from birth to end of life including veterinary oversight in the development of protocols for the prevention, control, and treatment of common diseases. Protocols developed with veterinarians will include judicious and responsible use of antibiotics.

Second, dairy farms are evaluated at least once every three years and provided feedback on how they're doing by veterinarians, extension educators, university personnel, co-op field staff or other qualified evaluators who have completed the two-day, intensive training and have passed a comprehensive exam. The evaluation provides farmers with the information they need to develop action plans for continuous improvement. Third, the integrity of the program is ensured through third-party verification, which is completed by outside experts who inspect a representative percentage of farms each year. When the dairy industry says it's taking great care of its animals, third-party verification measures it – providing statistically verified data demonstrating that excellent animal care is an expectation of the dairy industry.

Today, 84 dairy cooperatives and proprietary processors representing nearly 95 percent of the U.S. milk production are enrolled in the FARM Program. More than 38,000 on-farm evaluations have been conducted by the almost 400 certified FARM evaluators. The FARM Program has successfully completed five years of third party verification with results published annually.ⁱⁱⁱ The FARM Program has been developed by NMPF with support from Dairy Management Inc.

Question 4: Please provide information on the best ways to collect data on antibiotic use [and resistance] in animal agriculture through public-private collaborations. Your response can include information on the types of data to be collected, including the method of collection, and the metrics for reporting the data. If helpful, please cite sample models as examples to depict your answer.

Current data collection efforts are fragmented and ad hoc, resulting in information that has not been scientifically beneficial. The current efforts to collect animal use data are comprised of limited efforts in the U.S. Department of Agriculture (USDA) National Animal Health Monitoring System and Agricultural Resource Management Survey, and the U.S. Food and Drug Administration (FDA) collection of sales data from animal health companies. Despite cautions from the FDA about using comparing the animal sales data to human data, this practice is common and has been used to intimate that volumes of use are correlated to risk. This misuse of this sales data will be exacerbated by the new requirement for sponsors to estimate the amount sold for use in the various species. Requiring estimates is a step away from gathering good, science-based data that is useful.

NMPF believes a data collection program should have the following characteristics:

1. *Objective driven.* A data collection program should start with a clearly stated scientific purpose which drives the collection method. To date, this clear objective has been lacking in federal data collection efforts.
2. *Comprehensive.* Data should be collected on all uses, and data from the human, veterinary and other sectors should be collected in a way that makes meaningful comparison possible. The ad-hoc and separate efforts in collecting use data and reporting metrics in the animal and human arenas currently hamper comparability. Human health care systems are not reporting on a weight based measure, but rather in either days of treatment or defined daily doses. Simple comparisons by kilograms or pounds of antibiotics between animal and humans are inherently misleading simply due to the significantly larger biomass (40 fold) of food animals.
3. *Globally comparable.* Events continue to demonstrate the global nature of the antibiotic resistance challenge. Other countries have moved away from volume measurements to, for example, animal defined doses. Ensuring the U.S. produces globally comparable data will assist in the necessary global coordination of mitigation efforts.
4. *Protects confidentiality.* Public use of farm-level data must be aggregated to protect confidentiality and raw data must be protected from public disclosure.

There are significant efforts underway to better understand the drivers of antibiotic use in food animals with the goal of continuous improvement. The USDA Animal and Plant Health Inspection Service has proposed a comprehensive initiative that includes longitudinal studies, national cross-sectional studies, targeted studies and proprietary data collection. USDA's history of on-farm work and its ability to protect the confidentiality of data makes it uniquely capable of collecting this information. A coalition of livestock, veterinarian, and allied industry organizations have supported USDA funding for this effort resulting in both the House of Representatives and Senate appropriations bills containing funding for this effort.

Question 5: Please provide information on the different resources that exist to promote the understanding of how antibiotics are being used in humans and animals in different parts of the world. Your response can include information on the types of support to connect with such resources, as appropriate (examples include public-private partnerships, strategic resourcing, or other means).

Communication regarding the judicious and responsible use of antibiotics to all segments of the dairy chain is a top priority for the industry. For more than 25 years,

the U.S. dairy industry has focused educational efforts on the judicious use of antimicrobial drugs through the annual publication of a Best Practices Manual. The 2016 edition of the National Dairy FARM Program: Farmers Assuring Responsible Management™ *Milk and Dairy Beef Drug Residue Prevention Manual*^{iv} developed by NMPF is the primary educational tool for dairy farm managers throughout the country on the judicious and responsible use of antibiotics including avoidance of drug residues in milk and meat. Through the 2016 edition of the Residue Prevention Manual, NMPF and the U.S. dairy industry continues our commitment to the judicious and responsible use of antimicrobials. The 2016 edition of the Residue Prevention Manual also provides dairy farm managers guidance about the implementation of the Food and Drug Administration Guidance #209 and #213 and the revised Veterinary Feed Directive Rule.

Additionally, in September 2016 NMPF and the FARM Program are partnering with the American Association of Bovine Practitioners on two conference sessions during their Annual Meeting.^v These two conference sessions focus on the important role of dairy veterinarians working with dairy farmers to develop protocols for the prevention, control, and treatment of common diseases to ensure animal health and wellbeing. The sessions conclude with the joint role of veterinarians and dairy farmers in antimicrobial stewardship.

NMPF appreciates the opportunity to provide this feedback to PACCARB on the important issue of antibiotic resistance. The U.S. dairy industry is committed to the judicious and responsible use of antibiotics. If you have any questions or require additional information, please contact me at 703-243-6111 or at jjonker@nmpf.org.

Sincerely,



Jamie Jonker, Ph.D.
Vice President
Sustainability & Scientific Affairs

ⁱ <https://www.federalregister.gov/articles/2016/05/23/2016-12043/notice-of-request-for-information-by-the-presidential-advisory-council-on-combating>

ⁱⁱ http://nationaldairyfarm.com/sites/default/files/FARM_manual_2013_WEB.pdf

ⁱⁱⁱ http://nationaldairyfarm.com/sites/default/files/YearInReview_2015_FINAL_WEB.pdf

^{iv} <http://nationaldairyfarm.com/sites/default/files/2016-Residue-Manual.pdf>

^v <http://www.aabp.org/meeting/conference.asp>