September 9, 2009

Dear Senator:

As family farmer and sustainable agriculture organizations, we write to urge you to support S. 619, The Preservation of Antibiotics for Medical Treatment Act of 2009 ("PAMTA"), in restricting the nontherapeutic use in food animals of medically important antibiotics.

PAMTA amends the Federal Food, Drug, and Cosmetic Act to withdraw the approval of seven specific classes of medically important antibiotics – penicillins, tetracyclines, macrolides, lincosamides, streptogramins, aminoglycosides, and sulfonamides – for nontherapeutic feed-additive use. Unless the FDA determines "that there is a reasonable certainty of no harm to human health" from these antibiotics, they will be banned in two years.

Non-human antibiotics are a major source of antibiotic overuse. More than 70 percent of all U.S. antimicrobials are added to animal feed not used for treating disease, but rather as feed additives for healthy beef cattle, pigs and poultry to promote growth and to help manage the stresses on animals posed by confinement housing. Strong evidence now implicates this routine and widespread antibiotic use in livestock with rising antibiotic-resistant bacterial infections in humans.

Several groups that oppose PAMTA, including the National Pork Producers Council and National Cattlemen's Beef Association, claim the act will compromise food safety and animal welfare. In fact, the real threat comes from irresponsible industrial animal production practices. Producers pack huge numbers of animals tightly together in confined spaces and often feed them physiologically-incompatible diets, practices that leave the animals susceptible to disease and discomfort. The overuses of antibiotics that PAMTA would prohibit are propping up this unsustainable system at the expense of public health and animal welfare.

In contrast, diverse and sustainable farms create environments where animals thrive without the use of nontherapeutic antibiotics. Farmers who have chosen to raise cattle on pasture instead of in a feedlot, for example, or to farrow pigs in straw-bedded hoop houses instead of in gestation crates, know their animals are less susceptible to disease. The thousands of farmers that raise livestock using sustainable methods and without nontherapeutic antibiotics provide strong evidence to counter PAMTA opponents' assertions that livestock production depends on these drugs.

It is important to note that under PAMTA, farmers will not lose the ability to treat sick animals with antibiotics. The act allows therapeutic usage of antibiotics on the farm.

The nontherapeutic uses that are prohibited by the act constitute a public health risk that the largest Confined Animal Feeding Operations (CAFOs) continually pass on to society as a whole, for the sake of increased profits. This and other loopholes in federal environmental and agriculture policies have given CAFOs an unfair advantage over smaller, more responsibly-managed animal production operations. In addition to safeguarding public health, passing

PAMTA and closing other regulatory loopholes will help to even the playing field for family farmers and promote better farming practices.

In supporting a restriction on nontherapeutic use of antibiotics, the FDA is joining a broad consensus of physicians, scientists and other governments that have taken the same position. The American Medical Association, the Centers for Disease Control, the World Health Organization (WHO), and the Institute of Medicine of the National Academies of Science have all called for restrictions on the use of antibiotics for nontherapeutic purposes in food animals. And in 2006, on recommendation from the WHO, the European Union banned nontherapeutic antibiotic use in food animals.

It is imperative that we stem nontherapeutic antibiotics use in animal agriculture in order to preserve their tremendous power in treating human disease. PAMTA will also play an important role in promoting resilient agricultural systems that are healthy not only for animals, but for farmers and consumers as well.

Thank you for your prompt attention to this important matter.

Sincerely,

Ashtabula Lake Geauiga County Farmers Union (OH)
Family Farm Defenders
Farm Aid
Institute for Agriculture and Trade Policy
Land Loss Prevention Project (NC)
Land Stewardship Project
Michael Fields Agricultural Institute
National Sustainable Agriculture Coalition
National Family Farm Coalition
Northeast Organic Farming Association of Massachusetts
Rural Advancement Foundation International (RAFI)
Rural Vermont
Sustainable Farming Association of Minnesota