



The Johns Hopkins Center for a Livable Future  
Bloomberg School of Public Health  
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(410) 502-7578

Dr. William Flynn  
Deputy Director for Science Policy, Center for Veterinary Medicine  
Food and Drug Administration  
Metro Park North 4, Building Room 176  
7519 Standish Place, Rockville, MD 20855

August 23, 2017

*Disclaimer: The opinions expressed herein are our own and do not necessarily reflect the views of The Johns Hopkins University.*

Re: Veterinary Feed Directive Enforcement

Dear Dr. Flynn,

We are researchers at the Johns Hopkins Center for a Livable Future (CLF), an interdisciplinary academic center based within the Bloomberg School of Public Health in the Department of Environmental Health and Engineering. CLF engages in research, policy analysis, and education activities guided by an ecologic perspective that considers diet, food production, the environment, and public health to be interwoven elements of a complex system. We are writing to share our support for the Food and Drug Administration's (FDA) Veterinary Feed Directive (VFD) rule, and to encourage the enforcement of this rule.

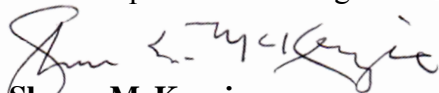
We believe that the VFD rule is an important step in ensuring the judicious use of medically important antimicrobial drugs in food-producing animals to limit the development and spread of antimicrobial-resistant pathogens and protect human and animal health. Since the rule's effective date of October 1, 2015, implementation efforts have largely focused on education. While we agree there is value in educational efforts, we feel strongly that enforcement activities will be the most effective component of VFD implementation with regard to antimicrobial resistance. While we acknowledge the difficult funding constraints faced by the agency, implementation of enforcement activities should not be contingent upon unpredictable future appropriations actions. We, therefore, encourage the FDA to prioritize and implement enforcement activities within the current budget. In addition, we believe that the FDA should collect and analyze the VFDs in order to evaluate the implementation and effectiveness of the educational and enforcement activities.

Thank you for considering our comments, and we welcome the opportunity to discuss this further and answer any questions you may have. Please contact us at (410) 502-7578 or by emailing Bob Martin, Director of the Food System Policy Program, at [rmarti57@jhu.edu](mailto:rmarti57@jhu.edu).

Sincerely,



**James D. Yager, PhD**  
Professor, Department of Environmental Health & Engineering  
Edyth H. Schoenrich Professor, Emeritus  
Interim Director, Center for A Livable Future  
Senior Associate Dean for Academic Affairs, 2000-2013  
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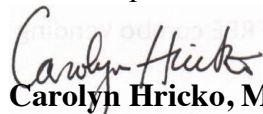
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