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Secretary Tom Vilsack  
United States Department of Agriculture  
1400 Independence Avenue  
Washington, DC 20250

Dear Secretary Vilsack,

The Johns Hopkins Center for a Livable Future (CLF) is an interdisciplinary academic center based at the Bloomberg School of Public Health. Our mission is to promote research and to develop and communicate information about the complex interrelationships among diet, food production, the environment and human health, to advance an ecological perspective in reducing threats to the health of the public, and to promote policies that protect health, the global environment, and the ability to sustain life for future generations. The CLF leads research, policy, advocacy, education, and communication activities that address the public health and environmental implications of the food system, and continuously works to strengthen policy initiatives at the local, state, and federal levels.

Given the growing public health burden caused by antibiotic resistant bacteria, the CLF commends the White House's recent focus on addressing antibiotic misuse in animal agriculture and its commitment to develop new antibiotics to treat drug-resistant infections. In anticipation of the 2016 budget appropriations and quadrupled funding for USDA efforts to combat antimicrobial resistance, we urge you to consider the following:

1. New antibiotics—developed using taxpayer dollars and capable of treating drug-resistant infections—should be aggressively managed by governmental agencies and limited for use either in humans or in food-producing animals in contrast to the present system of control by the large pharmaceutical companies

2. Increased funding should be allocated for research into alternative animal production practices that eliminate the need for non-therapeutic antibiotic use, not just for developing new antibiotics

The proposed budget would increase funding for the development of new antibiotics, non-traditional therapeutics, and vaccines to combat antibiotic resistance. As commercial interest in antibiotic development lags, federal dollars are vital to the effort to find new ways to treat drug-resistant infections. Given the potential influx of taxpayers' dollars toward this goal, any new drugs developed to combat antibiotic resistance should be met with strict oversight and continuous monitoring of use from the United States Department of Agriculture (USDA), Federal Food and Drug Administration (FDA), and the Centers for Disease Control and Prevention (CDC). In order to prevent overlap in the classes of antibiotics used to treat humans and food-producing animals (a practice that contributes to accelerated growth of drug-resistant bacteria), drugs developed using federal funding should be federally managed, and their approved use limited to their intended species.

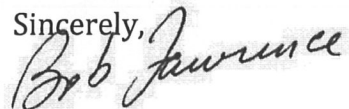
The CLF supports a goal to reduce antibiotic use by employing alternative food animal production models that obviate the need for routine, non-therapeutic antibiotic use. The President's Committee Advising on Science and Technology's (PCAST) report on Combating Antibiotic Resistance included a recommendation entitled, "Limiting the Use of Antibiotics in Animal Agriculture," which leans heavily on Guidance 213 and charges the FDA with monitoring its effectiveness. As a voluntary policy, Guidance 213 is an inadequate response to the call to limit the non-therapeutic use of antibiotics and does little to investigate or promote alternative farming methods that require fewer antibiotics in the first place. The USDA should encourage an increase and reallocation of funding to support research into methods that could negate the need for non-therapeutic antibiotic use on farms (such as deeply-bedded pens and later weaning times in swine production, or access to the outdoors in chicken production), and should further support farmers during the transition to these alternative models.

The 2016 budget presents an opportunity to meaningfully tackle antibiotic resistance and the misuse of antibiotics in animal agriculture. New drug development is essential, and the White House's prioritization of this issue is commendable. But we are missing the mark if we do not also increase funding for the USDA to investigate alternative methods of animal production and promote those that reduce the need for antibiotics in food-producing animals. To significantly reduce antibiotic resistance, we need to find new ways to treat infections, but we also must take whatever actions we can to prevent the proliferation of antibiotic-resistant bacteria. Prevention is not feasible under our current industrial model of animal production, but the adoption of and transition to different models requires money. This budget gives the USDA a chance to reserve a portion of the proposed \$77 million for the promotion of alternative animal production practices that will cut down on antibiotic use and the rise of resistant bacteria.

We ask you to use forthcoming increases in funding to effectively manage newly developed drugs while promoting alternative animal production methods that will reduce our need for these drugs. We hope you will recognize the 2016 budget allocations as an opportunity to tighten the use of new life-saving drugs, promote alternative agricultural systems that prevent the overuse of antibiotics, and move the bar in the fight against antibiotic resistance.

For more information please contact me at [rlawren1@jhu.edu](mailto:rlawren1@jhu.edu) or at (410) 502-7578. You may also contact Robert Martin, Director of the Food Systems Policy Program, at [rmart57@jhu.edu](mailto:rmart57@jhu.edu).

Thank you for your time and consideration.

Sincerely,  


Robert S. Lawrence, Director