

PROVEN

BENEFITS OUTWEIGH ALLEGED THREATS

A ban would lower food safety, raise questions



When both parties to an argument want the same result, you'd think the debate could reach a practical conclusion – where each side could agree on a workable arrangement incorporating the best points from the other's stance. That is not the case, though, in the on-going discussion about the use of antibiotics in food animal production and the looming federal ban on some of them because they might cause antibiotic resistance in the future that might harm people if they eat meat products.

Of course food animal producers and the Food and Drug Administration (FDA) both want to ensure food safety for Americans. Producers have been accommodating. Their industry group, the Animal Health Institute (AHI), says it is “committed to working collaboratively with the FDA to address these concerns [about antibiotics] while assuring the availability of important animal health products to prevent, control and treat animal disease.” For its part, the FDA is considering voluntary measures to mitigate non-therapeutic antibiotic use while further, more conclusive research is conducted.

But outspoken opponents of livestock production have raised the decibel level of the controversy, and are calling for unconditional concessions from agriculture. Facts, research, important considerations – even the truths of the matter – have taken a backseat to inflaming consumer emotions, political posturing and grandstanding by activists with an anti-agricultural axe to grind.

Militant animal rights groups along with fringe cliques of vegans, greens and organic enthusiasts have seized the opportunity to drum up support for the ban on antibiotics in food animal production as part of a long-term strategy to eliminate animal agriculture altogether. That's to be expected – as is the inevitability of lawmakers, regulators, the general media, consumer advocates and public health officials all jumping on the bandwagon in the name of food safety and public health.

What is baffling – not to mention extremely troublesome – is how readily a sizable portion of the science community has picked up the cause before research or studies have established a link between antibiotic use in livestock production and antibiotic resistance in humans. At best these scientists seem to be basing their conclusions on “counterfactual thinking” – a phrase coined by psychologists to describe patients who dwell on the “what-ifs” in their lives. In economic and scientific applications, counterfactual theory is a process of forecasting a trend or an outcome based on data or circumstances that do not necessarily exist and events that did not happen.

As crazy as it sounds, counterfactual theory is used in forecasting how policy initiatives might impact economic activity and productivity outcomes. For example, recent efforts to develop models forecasting green house gas (GHG) emissions from land-use-change appear to have relied not only on “what-ifs” and non-occurring events but also on events (droughts and excessive rains) that did happen but were not considered. One model prepared by Purdue University last year for California's Air Resources Board (CARB) to justify its introduction of stricter regulations on CO2 emissions was drastically modified this past spring after a year's worth of pushback from concerned scientists criticizing its data, presumptions and counterfactual reasoning.

It seems the “modelers” calculating the release of CO2 from indirect-land-use change did not factor in important market data or by-product information and omitted key weather and actual yield records in calculating the amount of ethanol feedstock. The result is that the exaggerated estimations of corn ethanol's GHG emissions had to be reduced 72 percent. Oops.

When it released the new data last March, the Purdue research team explained that its new, lower estimations of GHG emissions would be “roughly a quarter of the only other published estimate of releases attributable to changes in indirect land use.” By the way, that *only other published estimate* was theirs.

Despite the dramatically lower incident of GHG emissions attributed to corn growers, you would think California would initiate a complete review and overhaul of its stiff regulations. At the moment CARB has not adopted the lower estimate. It is going forward with the original forecasts which will severely damage America's agricultural economy and ultimately affect the nation's GDP, energy independence and possibly national security. To make matters worse, 13 other states have adopted California's low carbon fuel standards lock stock and erroneous barrel, with no deference to the new findings.

Following A Wrongheaded Approach

A growing number of bioscience researchers, public health officials and the FDA are about to go down a similar path of counterfactual thinking as they call for a ban on antibiotics purportedly used to promote faster food animal growth. They are earnestly trying to make a connection between the 90,000 annual hospital patient deaths caused by infections from drug resistant bacteria and the use of antibiotics in food animal production. They aren't quite claiming these infections contracted in hospitals (no less) are caused by antibiotic use in food animal production. But they are asking, “What if it could happen – that food animal antibiotics could create an environment where drug-resistant bacteria might spread to humans?” And then saying, “Well then let's just ban them now.” [continued on page 14]

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These scientists should be more concerned about the 250 known food-borne diseases currently affecting humans. Or the 1,200 food-borne outbreaks the Centers for Disease Control (CDC) investigates every year. Or the 76 million people around the world who suffer some sort of food-related illness. Or those 5,000 of the 300,000 Americans hospitalized yearly who die from food-borne disease. Or the more than 100 trillion microbes residing in each animal and human. Or the 10 billion additional animals it will take in the next ten years to feed a world population that will grow by 2 billion people by 2020.

For these problems and threats, there already are solutions: antibiotics. Their judicious use and continued development is what will keep humans healthy and ensure meat and egg products are safe.



“Facts, research, important considerations.....have all taken a back seat to inflaming consumer emotions and political posturing...”

What's the matter with Kansas?

...or Texas or Nebraska for that matter.

Most Kansans would tell you, “Nothing.” What’s more, they’d take exception to being associated with the book of the same title that appeared on the New York Times Best Seller List for 18 weeks in 2004. It’s about how the state shifted from a traditionally populist political bearing to one with a staunchly conservative bent. But that’s not the issue.

There really could be something the matter with Kansas, the nation’s top meat processing state, as well as with the other food animal production and packing states, if a federal ban on the use of some antibiotics is enacted. There could be real problems also for American meat eaters and the swelling global population demanding more protein in its diet – and not just because the costs of meat products will skyrocket when producers pass along the medical expenses of treating herd illnesses that antibiotics would have prevented. Human health is at stake, too.

If Congress passes the Preservation of Antibiotics for Medical Treatment Act (PAMTA: H.R.1549/S. 619), consumers will be exposed to health risks that don’t necessarily have to emerge. The CDC’s Center for Zoonotic, Vector-Borne and Enteric Diseases maintains that 75 percent of major new infectious diseases are transmitted to humans by animals. PAMTA legislation calls on the agriculture industry to voluntarily end the “injurious” use of drugs to help animals grow. But the passage of PAMTA – whose more strident supporters want to do away with the “voluntary” language of the bill, making it mandatory – would limit food animal producers in their efforts to prevent, treat and control disease outbreaks with antibiotics.

WHO ELSE GETS HURT?

Consumers will feel the pain in their pocketbooks, of course, and they will be exposed to dangerous food-borne diseases. But if PAMTA becomes law, the food animal agriculture, processing and packing industry will also suffer, which will infect the U.S. economy. An ailing economy is always hazardous to everyone’s health.

Here’s what’s at stake, or what could be endangered if unwarranted regulations were to be imposed on the food animal production and processing industry:

- It contributes about \$850 billion to the U.S. economy, representing about 6% of the GDP.
- It directly employs about 525,000 workers with a payroll of \$19 billion; and contributes to the employment of 6.2 million Americans and a payroll of \$200 billion.
- It generates \$81 billion in tax revenues for the federal government and \$2.6 billion to state coffers.

Closer to the *ProfitBuilder* universe – animal health dealers and farm store retailers - the food animal production and procession industry purchases \$380 billion worth of supplies overall which in turn has created 2.6 million jobs.

Sources: Centers for Disease Control (CDC); American Meat Institute.



The Reality Of The Situation – *and your response*

CONGRESSIONAL SUPPORTERS OF THE ANTIBIOTICS BAN HAVE ONLY HALF THE VOTES THEY NEED – BUT THREE QUARTERS OF THE PUBLIC THINK IT'S A GOOD IDEA

At the moment, the fate of H.R. 1549 and S. 619 – the Preservation of Antibiotics for Medical Treatment Act (PAMTA) – is up in the air. So far the legislation, introduced by Rep. Louise Slaughter (D. NY), that would ban or restrict the use of non-therapeutic antibiotics in food animal production has garnered support from about half of the House democrats. It remains to be seen whether serious discussion will commence on Capitol Hill this fall or during the lame duck session after the elections. It could be tabled until 2011.

But the issue is building up a head of steam outside the corridors of Congress. The House Energy and Commerce Subcommittee on Health held hearings in July following the FDA's publication of a 19-page "draft guidance" document that called on the agriculture industry to voluntarily end the "injudicious" use of drugs to help animals grow. The agriculture industry has been accused of using antibiotics routinely to promote faster growth and weight gain in beef cattle.

Consumer interest groups, some public health officials, members of Congress, the media and regulators are pushing for the swift enactment of PAMTA – and they would rather the proposed guidelines be mandatory than voluntary. The day after the draft guidance came out, their sentiment shifted almost seamlessly into a general attack on agriculture. In an editorial (July 12, 2010), *USA Today* described the situation as "a classic case of the public interest taking a back seat to private commercial interests, the farm lobby has for decades successfully fought restrictions on animal use of antibiotics." The editors attributed the grim statistic of 90,000 hospital patients who die each year from infections resistant to human antibiotics on the use of food animal antibiotics.

Such a line of thought is speculative and naïve, and definitely not backed up by current research. In fact scientists at the Centers for Disease Control (CDC) and the National Institutes of Health point out there are no studies connecting antibiotic use in livestock production with the build-up of antibiotic resistance in people. A survey of experts in bioscience, chemistry and pharmacology published in the *Journal of Antimicrobial Chemotherapy* estimated 96% of human antibiotic resistance comes from humans using antibiotics. Some experts suggest more research be focused on what actually causes antibiotic resistance – which is something of a bioscience mystery and a real problem in itself. Speculation on possible links between antibiotics in food animal production and resistance in humans is a dangerous game. Says

microbiologist and bacteriologist Dr. Peter Silley, a professor at the University of Bradford in the U.K: "Blunt policy instruments [bans and/or restrictions] could be harmful in dealing with such a critical and complicated issue. It is easy to point fingers and suggest that eliminating some uses in animals would reduce antibiotic resistance in humans. But it is important to act on specific, data driven evidence. Simple widespread bans on certain uses, including those in animals, would be detrimental to animal health and, more importantly, human health." Take Denmark for example. The country, with a pork industry about the size of Iowa's, instituted a ban on the use of antibiotics as growth promoters in 2000. A decade later the ban has not reduced antibiotic resistance patterns in humans. However, it has resulted in increased death and disease among animals, and required even greater amounts of antibiotics to treat and prevent disease.

But the controversy is reaching a boiling point now as animal rights and food safety groups ally themselves against production agriculture. For these crusaders big agriculture is the new 'big oil' and they have dug in to oppose it, some even vowing to eradicate animal agriculture altogether. In the meantime, they'll take any win they can. If banning or restricting the sales of some OTC antibiotics brings them closer to total victory, they'll focus on it.

What You Can Do

Here's what you can do to be part of the "pushback" against the ban and to ensure American agriculture is allowed to continue to operate its business in the manner that has provided the healthiest, most nourishing, safest and most economical food in the world:

- Communicate your thoughts about PAMTA (H.R. 1549) to the FDA. Its original public commentary period was scheduled to end August 30, 2010. Usually these periods are extended in cases where more research is required and the issue has captured the interest of the public – which this bill has. Additionally, H.R. 1549 is not likely to reach a vote until next year – so it is imperative you continue to register your thoughts and feelings. You can file your comments or get more information about how to go on record with these groups:
 - ◊ www.regulations.gov : It is the federal government's website that allows the public to find, review and submit comments on Federal documents that are open for comment.
 - ◊ The National Cattlemen's Beef Association (NCBA) and the American Veterinary Medical Association (AVMA) have "Vote NO on PAMTA" websites that help you understand the issues and state your opinions and objections. Just go to their sites and follow the links.
- Contact your House and Senate representatives. Their offices will probably have a formalized document and/or form letters that allow you to register your feelings quickly and succinctly. If your representative is opposed to the legislation (H.R. 1549), his office may have the most efficient ways to make your voice heard.
- Even if your representatives favor the ban or restricted use of antibiotics, you should make sure they hear your point of view.
- For additional scientific and technical information to better understand the animal antibiotic debate, visit the websites of the AVMA, the CDC, the Infectious Diseases Society of America, the FDA, and the USDA. These groups have developed guidelines in collaboration with the AVMA's species specific allied veterinary organizations to safeguard public health by providing specific recommendations for responsible and prudent therapeutic use of antibiotics.
- Make sure your customers are informed about PAMTA and the impact its passage would have not only on their businesses but also on their way of life.
 - ◊ Collect and distribute literature/opinions/research regarding the legislation to your customers. You can get it from the AVMA, FDA, NCBA, USDA, land grant university agricultural economics departments and extension services, the CDC and others.
 - ◊ Don't forget to review the data those groups supporting PAMTA are using. It never hurts to know what your opposition is thinking.
 - ◊ Hold or sponsor a town hall meeting or symposium at the store/community to brief customers on the issues. Invite your representatives or their aides to conduct an event; or your distributor and pharmaceutical company reps.
 - ◊ At the same time or in conjunction with these briefing events, hold a petition rally to get farmers and livestock producers to document their concerns. Your congressional/senate representatives will be more than willing to supply all forms and documents your customers will need to file formal comments regarding the issue.