

The Honorable Xavier Becerra
Secretary
Department of Health and Human Services
200 Independence Avenue, Southwest
Washington, D.C. 20201

April 20, 2023

Dear Secretary Becerra,

We respectfully request a meeting to discuss the neglected public health crisis of antibiotic resistance and the urgent need for your leadership on federal action. We seek a public commitment to the following steps as critically important to protect the public from the spread of antibiotic resistance, and to ensure the future effectiveness of antibiotics that are essential to modern medicine:

- **Set national HHS-wide targets for reducing antibiotic use in both human medicine and food animals, along with timelines for reaching those targets.**
- **Direct the FDA to robustly collect and analyze antibiotic use information from feed mills.** Around two-thirds of all medically important livestock antibiotics are mixed into animal feed for eventual feeding to groups of animals. Under existing regulations, mills must notify the FDA before distributing feed containing medically important antibiotics, keep veterinary orders with indication and dose information along with records of the amount of feed distributed under each order, and then make these records available to the FDA for inspection. FDA should require mills to submit these data and then analyze these data as a source of information on how and what antibiotics are used on farms.
- **Ensure all federal antibiotic sales and use information is housed within a central HHS office** (‘Mission Control’), funded to analyze both antibiotic use and resistance information across human and animal settings, and environments, and publish fully-integrated annual reports on it.
 - **Expand HHS/FDA reporting to include all antibiotic drug sales**, not just livestock sales. Break these sales out by individual state.
 - **Work with EPA to report antibiotic sales each year for non-animal agricultural uses, such as pesticides on crops or orchards.**

Globally, antibiotic resistant infections took the lives of over 1.2 million people in 2019 and, in the U.S., they kill at least 35,000 people each year – and possibly five times as many.¹ Antibiotic resistance can affect anyone. However, the millions of people in the United States who are suffering from chronic illness, cancer, kidney failure, or are undergoing surgery are at a much higher risk of getting sick and subsequently dying from resistant infections. By 2050, the global toll from antibiotic-resistant infections may reach 10 million deaths annually.

Despite ongoing, global spread of these deadly “superbug” bacteria, the U.S. response has fallen short on curbing its chief driver – widespread and avoidable overuse of these precious medicines. One prime example is that U.S. policymakers still have not met the public health imperative to build systems that can robustly track where and how antibiotics are used, especially in non-human settings such as farms and feedlots. Without these tracking systems, patterns of antibiotic overuse cannot be identified and efforts to end that overuse are not mounted.

Antibiotic overuse and the spread of antibiotic resistance are intertwined. The first speeds up the second. To protect against the spread of resistance, the U.S. needs a comprehensive system that monitors antibiotic use and levels of resistance across the various settings in which they occur. Drug-resistant bacteria travel easily between animals and people and throughout their shared environments. Effective surveillance for antibiotic resistance, therefore, must fully integrate information from all these settings, using what is now called a One Health approach.ⁱⁱ

We look forward to meeting with you. Please contact Steve Roach, sroach@foodanimalconcerns.org, to coordinate the details of that meeting. Thank you for your consideration.

Sincerely,

Steve Roach
Safe and Healthy Food Program Director
Food Animal Concerns Trust
Keep Antibiotics Working Coalition
Senior Analyst

Rich Capparell
Director, Legislative Affairs
Association for Professionals in Infection
Control and Epidemiology

Pat Johnson
Director, Federal Advocacy
American Academy of Pediatrics

Belita Cowan
Founder
Lymphoma Foundation of America

Katie Huffling
Executive Director
Alliance of Nurses for Healthy Environments

Holly Carpenter
Senior Policy Advisor
American Nurses Association

Laura Rogers
Deputy Director
Antibiotic Resistance Action Center, George
Washington University

Karen Perry Stillerman
Deputy Director, Food and Environment
Program
Union of Concerned Scientists

Robert M. Gould, MD
President
San Francisco Bay Physicians for Social
Responsibility

Emma Sirois
National Director, Healthy Food in Health
Care
Health Care Without Harm

Christy Phillips
Executive Director
Pediatric Infectious Diseases Society

Geoff Horsfield
Government Affairs Manager
Environmental Working Group

Conrad Amenta
Executive Director
San Francisco Marin Medical Society

Hannah Connor
Environmental Health Deputy Director
Center for Biological Diversity

Carrie Apfel
Senior Attorney
Earthjustice

Janet Nudelman
Senior Director of Program and Policy
Breast Cancer Prevention Partners

Bob Martin
Associate Director for Strategic Initiatives
Johns Hopkins Center for a Livable Future

David Wallinga, MD
Senior Health Officer
Natural Resources Defense Council

Juliet Sims
Associate Program Director
Prevention Institute

Matt Wellington
Public Health Campaigns Director
PIRG

Jaydee Hanson
Policy Director
Center for Food Safety

Dr. Pam Runquist
Executive Director
Humane Society Veterinary Medical Assoc.

Michael Hansen
Senior Scientist
Consumer Reports

Danie Palermo
Regulatory Specialist, Federal Affairs
Humane Society Legislative Fund

Richard J Jackson MD MPH FAAP
UCLA Fielding School of Public Health
Former Director CDC National Center for
Env Health, Former State Health Officer for
California

ⁱ Nadimpalli, Maya L., Courtney W. Chan, and Shira Doron. “Antibiotic Resistance: A Call to Action to Prevent the next Epidemic of Inequality.” *Nature Medicine* 27, no. 2 (February 2021): 187–88. <https://doi.org/10.1038/s41591-020-01201-9>.

ⁱⁱ According to the CDC ([One Health Basics](#)), a *One Health* approach simply recognizes the health of people, animals, and their shared environments are interconnected.