



HCWH Policy Statement on Antibiotics in Food

HCWH supports policies and practices that initially reduce and in the longer term eliminate the procurement of meat, fish, and dairy products produced with routine, non-therapeuticⁱ uses of antibiotics.ⁱⁱ

Background:

The increasing resistance of bacteria to antibiotics is a public health crisis. Antibiotic overuse is a key driver.

Hospitals and health care institutions have a substantial interest in ensuring that existing antibiotics remain effective for treating human infections as long as possible; In addition, few additional antibiotics are now under development,¹ and any new ones are likely to be significantly more expensive.²

The majority of U.S. antibiotics currently are given to animals, with a substantial proportion given to food animals without any diagnosed illness (non-therapeutic use), either to promote growth or to compensate for the infectious risk stemming from crowded, stressful, and often unsanitary conditions;³ these nontherapeutic antibiotics are generally administered as feed additives.

The World Health Organization recently released a report describing the success of Denmark, the world's largest exporter of pork, in ending nonprescription use of antibiotics in livestock production, including use of antibiotics as routine feed additives⁴ The European Union is pursuing similar policies.⁵ After the phase-out of these non-essential uses, the levels of resistant bacteria in animals, as well as on food, were markedly reduced; the impacts on productivity and animal health were minor.⁶

In 1999, the American Public Health Association urged the Food and Drug Administration (FDA) to adopt regulations "eliminating the non-medical use of antibiotics and limiting the use of antibiotics in animal feeds."⁷ The FDA has not proposed such regulations. Rather, FDA itself acknowledges that final adoption of such regulations would likely take several years once proposed, with administrative procedures for removing already-approved drugs from animal feeds typically take from six to twenty years per drug or drug class.⁸

On the other hand, analyses subsequent to 1999 have confirmed and further reinforced the contribution of the overuse of antibiotics in animal agriculture to antibiotic resistance affecting humans.⁹ These include:

- The *New England Journal of Medicine*'s October 2001 publication of an editorial titled "Antimicrobial use in animal feed – time to stop;"¹⁰
- The Institute of Medicine's March 2003 report on microbial threats to health, which stated "Clearly, a decrease in antimicrobial use in human medicine alone will have little effect on the current situation.

ⁱ This policy uses the term "nontherapeutic" to mean administration of antibiotics to an animal or groups of animals for purposes other than disease therapy or non-routine disease prevention.

ⁱⁱ In this policy, the term antibiotic has the same meaning as the more technical term "antimicrobial." Antimicrobials are substances of natural or synthetic origin that kill or inhibit the growth or multiplication of bacteria (adapted from *American Veterinary Medical Association Judicious Therapeutic Use of Antimicrobials*, <http://www.avma.org/scienact/jtua/jtua98.asp>). However, the term antibiotic does not include ionophores or other compounds from classes of drugs not used in human medicine that are used as coccidiostats.

Substantial efforts must be made to decrease inappropriate overuse in animals and agriculture as well;¹¹

- An expert consultation of the World Health Organization, which concluded in its report published December 2003 that “There is clear evidence of the human health consequences due to resistant organisms resulting from non-human usage of antimicrobials. These consequences include infections that would not have otherwise occurred, increased frequency of treatment failures (in some cases death) and increased severity of infections.”¹²
- A multidisciplinary group of scientists concluded based on a two-year review of more than 500 studies that “elimination of non-therapeutic use of antimicrobials in food animals and agriculture will lower the burden of antimicrobial resistance ... with consequent benefits to human and animal health.”¹³

Meanwhile, in June 2003, the McDonald’s Corporation adopted a policy requiring certain meat suppliers to reduce use of medically important antibiotics as growth promoters, and providing for a purchase preference for other suppliers that comply with the policy,¹⁴ and that Bon Appetit, a major food-service company, in November 2003 adopted a policy that is similar to but more extensive than the McDonald’s policy.¹⁵ More generally, a growing number of suppliers are able to supply meat, fish, and dairy products produced without routine use of antibiotics.¹⁶

REFERENCES

- ¹ See, e.g., “Why is Big Pharma Getting Out of Anti-Infective Drug Discovery?” Session at 43rd annual Interscience Conference on Antimicrobial Agents and Chemotherapy (“In the last four years several large pharmaceutical companies have either eliminated or greatly curtailed their anti-infective research activities.”) Available at: <http://www.icaac.org/43ICAAC/PrelimProgram.asp>. Accessed Jan. 30, 2004.
- ² Environmental Defense, 2001. When Wonder Drugs Don’t Work: How Antibiotic Resistance Threatens Children, Seniors, and the Medically Vulnerable. Washington, DC: Environmental Defense. Available at: http://www.environmentaldefense.org/documents/162_abrreport.pdf. Accessed Jan. 30, 2004.
- ³ Mellon et al. Hogging It: Estimates of Antimicrobial Abuse in Livestock. Union of Concerned Scientists: Cambridge MA. 2000.
- ⁴ World Health Organization (2003). Impact of antimicrobial growth promoter termination in Denmark. WHO/CDS/CPE/ZFK/2003.1. Available at: <http://www.who.int/salmsurv/en/Expertsreportgrowthpromoterdenmark.pdf>.
- ⁵ HC Wegener (2003). Antibiotics in animal feed and their role in resistance development. *Current Opinion in Microbiology* 6: 439-445.
- ⁶ Wegener HC. Antibiotics in animal feed and their role in resistance development. *Current Opinion in Microbiology* 2003; 6:439-445.
- ⁷ APHA Resolution 9908: Addressing the Problem of Bacterial Resistance to Antimicrobial Agents and the Need for Surveillance. Available at: <http://www.apha.org/legislative/policy/99policy.PDF>. Accessed Jan. 30, 2004.
- ⁸ Letter of February 28, 2001, from Stephen F. Sundlof, D.V.M., Ph.D., Director of FDA’s Center for Veterinary Medicine re: Docket 99P-0485/CP.
- ⁹ Alliance for Prudent Use of Antibiotics (2002). The Need to Improve Antimicrobial Use in Agriculture: Ecological and Human Health Consequences. *Clinical Infectious Diseases*, Volume 34 Supplement 3. Available at: <http://www.tufts.edu/med/apua/Ecology/faair.html> Accessed Jan. 30, 2004 (“The elimination of non-therapeutic use of antimicrobials in food animals and agriculture will lower the burden of antimicrobial resistance ... with consequent benefits to human and animal health”). See also Wegener, HC (2003). “Antibiotics in animal feed and their role in resistance development.” *Current Opinion in Microbiology*, Vol. 6: 439-445.
- ¹⁰ S. Gorbach (2001). “Antimicrobial use in animal feed – time to stop.” *New England J. Medicine*, Vol. 345: 1202-03 Institute of Medicine, Board on Global Health (2003). *Microbial Threats to Health: Emergence, Detection, and Response*.
- ¹¹ National Academy of Sciences Press, Washington, DC. Available at: <http://books.nap.edu/books/030908864X/html/R1.html#pagetop>. Accessed Jan. 30, 2004.
- ¹² Joint WHO/FAO/OIE Expert Workshop on Non-human Antimicrobial Usage and Antimicrobial Resistance, Geneva, 1 – 5 December 2003, Executive Summary. Available at: <http://www.who.int/foodsafety/micro/meetings/nov2003/en/>. Accessed Jan. 30, 2004.
- ¹³ Alliance for Prudent Use of Antibiotics (2002). The Need to Improve Antimicrobial Use in Agriculture: Ecological and Human Health Consequences. *Clinical Infectious Diseases*, Volume 34 Supplement 3. Available at: <http://www.tufts.edu/med/apua/Ecology/faair.html>. Accessed Jan. 30, 2004.
- ¹⁴ McDonald’s Corporate Press Release, June 19, 2003. “McDonald’s Calls for Phase-out of Growth Promoting Antibiotics in Meat Supply, Establishes Global Policy on Antibiotic Use.” Available at <http://www.mcdonalds.com/usa/news/current/conpr06192003.html>. Accessed Jan. 30, 2004.
- ¹⁵ Bon Appétit’s Policy on Antibiotics Use in Food Animals, November 18, 2003. Available at: <http://www.bamco.com/pressrelease/pdfs/antibioticpolicymaster1032003.pdf>. Accessed Jan. 30, 2004.
- ¹⁶ Numerous such suppliers, for example, are listed at www.EatWellGuide.org.