

May 8, 2023

Deb Haaland
Secretary
Department of the Interior
1849 C Street NW
Washington, DC 20240

Dave Applegate
Director
United States Geological Survey
12201 Sunrise Valley Drive
Reston, VA 20192

Re: Restoring the National Pesticide Use Map Database

Dear Secretary Haaland and Director Applegate,

The undersigned members of Keep Antibiotics Working¹ call upon the Department of Interior and the United States Geological Survey (“USGS”) to reinstate the thirty-two-year-old National Pesticide Use Map database to its original scope.

When the program’s scope was reduced in 2019, agricultural use of the medically important antibiotics oxytetracycline and streptomycin stopped being tracked by the US government. This continues to hamper the ability of public health researchers to track how this pathway can lead to the development of drug-resistant bacteria.

Furthermore, using the pesticide use data compiled by the USGS, the U.S. Centers for Disease Control and Prevention [found](#) that use of triazole fungicides was increasing dramatically as of 2016 and that this could be facilitating the recent rise of antifungal resistant disease in patients. However, many of the triazoles CDC was tracking, like difenaconazole, prothiconazole and triadimefon, are no longer being tracked by the USGS mapping project, hampering the ability of government researchers to track their use.

Additionally, new fungicides that are being approved by EPA, like ipflufenquin in 2021, may potentially be [facilitating](#) resistance to other antifungal drugs that are lifesaving medicines in humans – yet the National Pesticide Use Map Database has stopped providing use estimates for newly approved agricultural fungicides.

This is inconsistent with the public health needs of the United States and the stated priorities of the Biden Administration.

¹ Keep Antibiotics Working, a coalition of 19 health, consumer, agricultural, environmental, humane, and other advocacy groups, is dedicated to eliminating the inappropriate use of antibiotics in farm animals, a significant contributor to the rise in antibiotic resistant disease.

- Ending the collection of data on the agricultural use of antifungal drugs use while [growing numbers of people are dying from antifungal resistant infections](#) will hamper our ability to address this threat and is inconsistent with the goal of protecting public health. [Antimicrobial Resistant Fungal disease is on the rise](#) in the U.S. and has been linked by the CDC to [agricultural use of fungicides](#).
- Ending this program, or reducing its scope, is inconsistent with other efforts to address antimicrobial resistance using a [One Health approach](#), which looks at the connection between the health of people, animals, and their shared environment. Other federal agencies (e.g. [Food and Drug Administration](#) and [Environmental Protection Agency](#)) are attempting to develop new sources of data on antimicrobial use and antimicrobial resistance) while the Department of the Interior is cutting a longstanding successful program that provides these needed data.
- Ending this program is inconsistent with the [Biden administration's](#) and the [Department of the Interior's](#) commitment to address equity since the people most impacted by the use of pesticides are [members of marginalized communities](#).

We call on the USGS to:

- 1) Provide use estimates for *all* agricultural pesticides by restoring the scope of the program to its pre-2019 level;
- 2) Retroactively calculate estimates for all pesticides that lapsed during the recent program cuts; and
- 3) Continue adding new agricultural pesticides to the database as they gain EPA-approval.

Please protect this vital source of needed data.

Sincerely,

Center for Biological Diversity
Food Animal Concerns Trust
Johns Hopkins Center for a Livable Future
World Animal Protection