**Comments for the February 26-27, 2020 meeting of the Presidential Advisory Council on Combating Antibiotic-Resistant Bacteria (PACCARB)**

Keep Antibiotics Working (KAW) appreciates the opportunity to comment to the Presidential Advisory Council on Combating Antibiotic-Resistant Bacteria **(**PACCARB) and would like to provide the council with some of our concerns regarding efforts to address the threat of antibiotic resistance.

**Transparency in Funding Around Antibiotic Resistance:** KAW asks that PACCARB request and make publicly available the amount of money that **individual** federal agencies have spent to combat antibiotic resistant bacteria during the first 5 years of the National Action Plan. The reporting should be done by fiscal year and be broken down into specific programs as much as possible. Information on the number of full time employees (FTEs) should also be provided as appropriate.

This information is essential for PACCARB to fulfill its mission to "advise and provide information and recommendations to the Secretary regarding programs and policies intended to reduce or combat antibiotic-resistant bacteria". Budget information is needed to evaluate what has been done and to guide future spending. While past funding amounts are available for some programs, many important activities related to antibiotic resistance are included under much larger budget lines making it impossible for policy makers and Congressional appropriators to evaluate past spending. Congress has begun work on appropriations for fiscal year 2021, but the lack of transparency around funding for CARB-related activities makes it difficult for members of Congress or others to determine appropriate levels of funding into the future. KAW is particularly interested in spending by U.S. Department of Agriculture (USDA) and Food and Drug Administration (FDA) on CARB activities since there is a near total lack of funding transparency for these two agencies. PACCARB is ideally placed to request and report this information.

**Basis of Delays in Reporting:** KAW asks that PACCARB make additional inquiries to federal agencies to determine the basis for specific delays in the reporting of ongoing studies. Previously, PACCARB has received presentations from researchers collecting detailed voluntary antimicrobial use data in cattle and in swine under two FDA-funded cooperative agreements that started in 2016.[1] Since 2016, there has been no public release of these data sets or an analysis of them. Both the USDA and the FDA have pointed to the work of these researchers as a substitute for the comprehensive, national system for collecting mandatory antibiotic use data on farms and feedlots that has been repeatedly recommended by the Government Accountability Office in reports dating back to 2003. Therefore, KAW urges that PACCARB request clarification on the individual release dates of these studies. More generally it would be helpful for PACCARB as part of its mission to advise on CARB related policies to evaluate where there have been delays in reporting on PACCARB related activities.

[1] "NIAA_White_Paper_2018_Antibiotic Symposium.Pdf." Accessed February 4, 2020. https://animalagriculture.org/resources/Documents/White_Papers/White%20Papers/NIAA_White_Paper_2018_Antibiotic%20Symposium.pdf.
Affairs, Office of Regulatory. "Grants and Cooperative Agreements." FDA, November 8, 2019. http://www.fda.gov/federal-state-local-tribal-and-territorial-officials/funding-opportunities/grants-and-cooperative-agreements.

**Data Collection:** KAW asks that PACCARB seek information from the USDA as to why its Animal and Plant Health Inspection Service (APHIS) division has failed to report data collected on antimicrobial use as part of the recently released study titled "National Animal Health Monitoring System (NAHMS) in 2017: Antimicrobial Use and Stewardship on U.S. Feedlots".

Despite APHIS having collected such information from beef feedlot operators as part of this study, the final report fails to include the reason for use or duration of use for most antibiotics discussed therein. This particular information was precisely the reason for collecting responses from feedlot operators in the first place. In fact, APHIS limited its reporting of reason for use and duration of use solely to antibiotics that were used in at least 15% of all feedlots; the reason offered for this lack of reporting was purported concerns about confidentiality. This explanation does not hold up under scrutiny. USDA is prohibited from disclosing exactly which feedlots participated in the study, so it makes no sense that APHIS would claim confidentiality as a relevant concern. Withholding collected data resulted in APHIS not providing important information on tylosin, the medically important antibiotic that is administered to the largest number of cattle. More generally, it would be helpful for PACCARB to critically review federal agency activities related to data collection and reporting on antimicrobial use.

**Fluoroquinolone Resistance:** Lastly, we ask that PACARB review the ongoing rise in human *Salmonella* infections resistant to fluoroquinolones and related recent outbreaks caused by fluoroquinolone resistant *Salmonella* [2] [3] [4] and seek interagency coordination to address the threat this rise makes to public health. Fluoroquinolones are one of just three antibiotics recommended by the Centers for Disease Control and Prevention (CDC) to treat serious *Salmonella* infections, so these outbreaks and the overall increase in resistance in Salmonella causing illness in humans is troubling.

Formed in 2001, Keep Antibiotics Working is a coalition of 16 advocacy organizations that joined together to ensure that untreatable superbugs resulting from the overuse of antibiotics on farms do not reverse the medical advances of the past century.

[2] CDC. "Outbreaks of Salmonella Infections Linked to Backyard Poultry | Outbreak of Salmonella Infections Linked to Backyard Poultry | May 2019 | Salmonella | CDC," October 22, 2019.

[3] Salmonella Infections Linked to Contact with Pig Ear Pet Treats | Outbreak of Salmonella Infections Linked to Pet Treats | July 2019 | Salmonella | CDC," October 30, 2019.

[4] Plumb, Ian D. "Outbreak of Salmonella Newport Infections with Decreased Susceptibility to Azithromycin Linked to Beef Obtained in the United States and Soft Cheese Obtained in Mexico — United States, 2018– 2019." MMWR. Morbidity and Mortality Weekly Report 68 (2019).