

June 17, 2021

TO:
Presidential Advisory Council on Combatting Antibiotic-Resistant Bacteria

RE:
PACCARB Public Meeting, June 29 – 30, 2021



Dear PACCARB Members:

World Animal Protection, a global non-profit organization with offices in 13 different countries including the United States, appreciates the inclusion of One Health and the environmental dimensions of AMR on the meeting agenda and offers the following comments.

Regarding environmental dimensions of AMR, in 2020 World Animal Protection collected water and sediment samples from public waterways near to intensive hog facilities in four countries—US, Canada, Spain, and Thailand—and tested for the presence of antibiotic resistance elements. The [US report](#) and companion [global report](#) provide new evidence implicating intensive farm operations in contaminating local environments with antibiotic resistance. Notable differences in samples taken downstream compared to upstream suggest that the target facilities are contributing to the presence and spread of antibiotic resistance.

In the US testing, all samples taken across eight sites returned a positive PCR result for at least one target antibiotic resistance gene. Ninety-two percent had positive results for three or more resistance genes. All but one sample returned positive results for tetracycline resistance genes, relative abundance testing demonstrated that the quantity of tetracycline resistance genes was significantly higher in downstream soils compared to upstream. The proliferation of tetracycline resistance in the surrounding environment correlates with FDA annual sales data and APHIS survey data indicating tetracyclines are the largest use class in US hog production. Further, genes related to ESBL-producing bacteria were identified in 25% of samples.

Regarding One Health World Animal Protection urges PACCARB to identify opportunities to strengthen the role of improved animal welfare in reducing Use of antibiotics in the US National Action Plan. The NAP should incorporate a clear plan to eliminate the use of antibiotics across groups of animals, none of which have been diagnosed with the indicated disease, also called “disease prevention.” An NAP that is aligned with One Health principles must also strengthen monitoring, surveillance, and public reporting of antibiotics use by species and farm type, and of AMR in the environment. Excessive use of antibiotics in animal agriculture to compensate for poor husbandry drives AMR impacts food safety and creates spillover into our environment and waterways.

Thank you for the opportunity to comment.

Sincerely,

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We were known as **WSPA**
(World Society for the
Protection of Animals)