To whom it may concern,

The National Pork Producers Council is pleased to comment on the draft guidance document “Recommendations for Drug Sponsors for Voluntarily Bringing Under Veterinary Oversight All Medically Important Antimicrobial Drugs Approved for Use in Animals that Continue to be Available as Over-the-Counter Products” (Docket No. FDA-2019-D-3614). NPPC conducts public policy outreach on behalf of its 42 affiliated state association members, enhancing opportunities for the success of America’s 60,000 pork producers and other industry stakeholders by establishing the U.S. pork industry as a consistent and responsible supplier of high-quality pork to domestic and world markets.

The pork industry has a long-standing commitment to preserving public health, animal health and animal welfare through the responsible use of antimicrobials. Pork producers have led the way in supporting research projects to understand the epidemiology of antimicrobial resistance such as the National Antimicrobial Resistance Monitoring System and the Collaboration for Animal Health and Food Safety Epidemiology. In addition, the industry’s cornerstone tool for producer education on antimicrobial use is the Pork Quality Assurance Plus (PQA Plus) program. PQA Plus, launched in 1989, has focused largely on the avoidance of violative residues. Over the last 30 years, the program has expanded to include responsible antimicrobial use and best animal care practices. More than 70,000 producers and caretakers, as well as over 145,000 youth, are certified as having received education on PQA Plus good production practices. Additionally, more than 19,000 sites have been assessed on their compliance with the PQA Plus production practices, including demonstration of a Veterinary-Client-Patient relationship and adequate treatment records.

The first principle of the industry’s responsible use of antimicrobials is for producers to take appropriate steps to reduce the need for antibiotics. Pork producers work diligently to accomplish this goal. The pork industry also strongly supports veterinary oversight of all uses of animal health products regardless of marketing channels. However, we do realize that not all producers have easy access to swine veterinarians. We also note that smaller producers have fewer animals to absorb the costs of veterinary consultations. With that in mind, we would urge FDA to consider a mechanism for a small or remote producer to still access the life-saving antimicrobials their animals need in situations where veterinary access is lacking or unaffordable.

The National Pork Producers Council appreciates the opportunity to comment on this important document. NPPC is committed to encouraging responsible use of antibiotics to promote animal health, food safety and public health. We are prepared to conduct outreach to our producer membership regarding implementation of the final rule and look forward to future discussions as FDA moves toward implementing antimicrobial stewardship principles.

Sincerely,

David Herring
President
National Pork Producers Council