March 2, 2015

The Honorable Diane Feinstein
331 Hart Senate Office Building
Washington, D.C. 20510

The Honorable Susan Collins
413 Dirksen Senate Office Building
Washington, DC 20510

Dear Senators Feinstein and Collins:

On behalf of the Infectious Diseases Society of America (IDSA), I write to express support for the Preventing Antibiotic Resistance Act of 2015 (PARA). IDSA is deeply concerned that non-judicious use of antibiotics in both humans and food-producing animals increases antibiotic resistance in human pathogens and ultimately harms human health. Indeed, this concern is supported by a sound and extensive scientific basis that continues to grow. Unless we are able to significantly change how antibiotics are used in both humans and animals, we risk entering a “post-antibiotic” era.

IDSA supports current efforts by the Food and Drug Administration (FDA) under Guidance #213 to eliminate the use of medically important antimicrobials for growth promotion in animals. This approach relies on voluntary withdrawal of growth promotion indications on labels and requires veterinary oversight for other uses of antimicrobials administered in food and water, including disease prevention. However, we are concerned that, for many antibiotics important to human medicine and used in food-producing animals, the dose and duration (if specified) for “growth promotion” and “prevention” purposes are identical or nearly so. PARA would ensure that the dose and duration specifications on labeling claims for preventive use are supported by reasonable evidence. We view this as a sensible next step to achieve the policy goals of Guidance # 213.

We are especially encouraged by your efforts to ensure a bipartisan approach to this problem and we urge you to engage veterinary and agricultural stakeholders, as well as animal drug companies, to solve the problem of inappropriate use of antibiotics in food animals. In addition, we strongly believe it will be important for the FDA and the U.S. Department of Agriculture (USDA) to engage in ongoing monitoring of antimicrobial use in food animals to understand in real time whether the FDA’s policies are having the intended effect of reducing inappropriate use.

IDSA represents over 10,000 infectious diseases physicians and scientists devoted to patient care, disease prevention, public health, education, and research in the area of infectious diseases. Our members care for patients of all ages with serious infections, including meningitis, pneumonia, tuberculosis, HIV/AIDS, antibiotic-
resistant bacterial infections such as those caused by methicillin-resistant *Staphylococcus aureus* (MRSA), vancomycin-resistant enterococci (VRE), and Gram-negative bacterial infections such as *Acinetobacter baumannii, Klebsiella pneumoniae*, and *Pseudomonas aeruginosa*, emerging infections such as Middle East respiratory syndrome coronavirus (MERS-CoV), Enterovirus D68, and Ebola, and bacteria containing novel resistance mechanisms such as the New Delhi metallo-beta-lactamase (NDM) enzymes and others that make them resistant to a broad range of antibacterial drugs, including one of our most powerful classes of antibiotics, the carbapenems (carbapenem-resistant *Enterobacteriaceae*, or CRE).

We thank you for your commitment and we look forward to working with you to enact this important legislation and other measures to combat this alarming public health threat. Should you have any questions, please contact Jonathan Nurse, Director of Government Relations for the Infectious Diseases Society of America, at 703-299-0202 or jnurse@idsociety.org.

Sincerely,

Stephen B. Calderwood, MD, FIDSA
President

Cc: Tristan Colonius