



Leaders in Applied Public Health Epidemiology

National Headquarters
2872 Woodcock Boulevard | Suite 303
Atlanta, Georgia 30341
770.458.3811 | fax 770.458.8516

www.cste.org

CSTE is an organization that supports epidemiologists practicing at the state, territorial, tribal, and local levels.

Executive Board:

President:

Tom Safranek, MD
State Epidemiologist
Nebraska

President-Elect:

Laurene Mascola, MD, MPH
Chief, Acute Communicable
Disease Control Program
Los Angeles County

Vice President:

Stephen Ostroff, MD
Director, Bureau of
Epidemiology
Pennsylvania

Secretary – Treasurer:

Tim Jones, MD
State Epidemiologist
Tennessee

Chronic Disease / MCH / Oral Health:

Sara Huston, PhD
Chronic Disease Epidemiologist
Maine

Environmental / Occupational / Injury:

Martha Stanbury, MSPH
Manager, Division of
Environmental Health
Michigan

Infectious Disease:

Alfred DeMaria, Jr., MD
State Epidemiologist
Massachusetts

Members-At-Large:

Katrina Hedberg, MD, MPH
State Epidemiologist
Oregon

Janet Hamilton, MPH
Manager, Surveillance &
Reporting Section
Florida

Joe McLaughlin, MD, MPH
State Epidemiologist and Chief
Alaska

Executive Director:

Patrick J. McConnon, MPH

March 6, 2012

The Honorable Margaret Hamburg, MD
Commissioner, Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993-0002

Dear Commissioner Hamburg:

The Council of State and Territorial Epidemiologists (CSTE) and the National Association of State Public Health Veterinarians (NASPHV) join in strong support of the U.S. Food and Drug Administration's publication and enforcement of its rule FDA-2008-N-0326 restricting certain uses of cephalosporins in food animal production. This rule preserves the therapeutic use of cephalosporins by veterinarians, while prohibiting their use for other purposes.

Since 1999, CSTE and NASPHV have had a policy that recommends discontinuing the use of antimicrobials in animals for growth promotion if they are also used in human medicine (Position Statement 1999-ID 7). We continue to see this as a critical public health intervention to help reduce antibiotic resistance in pathogens that pose a considerable threat to human health.

Cephalosporins are critical antibiotics for treating infections in children; opportunistic infections in patients with cancer and HIV/AIDS; bacterial meningitis; gonorrhea; and infections in bones, the urinary tract, and the respiratory tract. In addition, cephalosporins are the drug of choice for treating high-risk cases of salmonellosis; however, they are becoming less effective against this disease due to rising drug resistance. Numerous studies demonstrate a strong link between the use of antibiotics in animal feed with the emergence of cephalosporin-resistant bacteria. In the United States, prevalence rates of *Salmonella* spp. resistant to ceftiofur and ceftriaxone (pharmaceuticals used in veterinary and human medicine, respectively), have been increasing in chickens, on retail chicken meat, and in humans since the National Antimicrobial Resistance Monitoring System (NARMS) began collecting data in 1996.

Most antimicrobials used in food animals are sold over-the-counter, and veterinarians are not consulted regarding their use. For more than 20 years, leading scientific and medical organizations have called for action against such injudicious antimicrobial use. Finalizing this rule will be an important step towards this goal, as will full realization of principles established in FDA Guidance 209: *The Judicious Use of Medically Important Antimicrobial Drugs in Food-Producing Animals*. The FDA is to be congratulated for taking this important step to ban cephalosporin use in food production and, at the same time, balancing concerns related to veterinary and human medical practice.

Sincerely,

Tom Safranek, MD
CSTE President

Kristy K. Bradley, DVM, MPH
NASPHV President