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June 30, 2015

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Karen L. Smith, MD, MPH, Director
California Department of Public Health
1615 Capitol Avenue, Suite 73.720
PO Box 997377, MS 0500
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RE: SB 27 (Hill) Livestock: Use of Antimicrobial Drugs – Support If Amended.

Dear Dr. Smith:

The CCLHO Board voted to take a support if amended recommendation on SB 27, a bill authored by Senator Hill that would require the California Department of Food and Agriculture (CDFA) to, among other things, adopt regulations to promote the judicious use of medically important antimicrobial drugs in livestock. CCLHO recommends that the bill be amended to replace disease prevention with disease prophylaxis.

Antibiotics must be used judiciously in humans and animals because both uses contribute to the emergence, persistence, and spread of resistant bacteria. Food animals serve as a reservoir of resistant pathogens and resistance mechanisms that can directly or indirectly result in antibiotic resistant infections in humans. For example, resistant bacteria may be transmitted to humans through the foods we eat. Preserving the effectiveness of antibiotic drugs is vital to protecting human and animal health. The current practice of providing antibiotics to entire herds and flocks to promote weight gain or improve feeding efficiency continues to contribute to the emergence of bacterial antibiotic resistance in humans.

This bill would require the California Department of Food and Agriculture to, among other things, adopt regulations to promote the judicious use of medically important antimicrobial drugs in livestock to ensure that each animal gets the maximum benefit from the drug and to help preserve the life-saving potential of the drugs in the future. The regulations shall include antibiotic stewardship guidelines that include rules on the proper use of medically important antimicrobial drugs for disease prevention. In addition, the stewardship guidelines shall include a commitment to use medically important antimicrobial drugs only when necessary to treat, control, and, in some cases prevent disease.

Although cattle, poultry and other business owners would no longer be permitted to provide antibiotics to herds and flocks to promote weight gain or improve feeding efficiency, guidelines that permit the use of antibiotics for preventing disease might allow the industry to continue to administer antibiotics to large groups of animals to prevent disease even when disease is not present or the risk of disease is low. Therefore, CCLHO supports SB 27 (Hill) Livestock: use of antimicrobial drugs if the bill is amended to replace disease prevention with disease prophylaxis.

Karen L. Smith, MD, MPH, Director
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As you know, the California Conference of Local Health Officers (CCLHO) is an organization of all legally appointed physician health officers in California's 61 city and county jurisdictions established in statute in 1947 to consult with, advise, and make recommendations to the California Department of Public Health (CDPH), other departments, boards, commissions and officials of federal, state, and local government, the Legislature, and any other organization or association on matters affecting health.

Thank you for your consideration. If you have questions, please feel free to contact me at Muntu.davis@acgov.org or 510-267-8010. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Muntu Davis MD, MPH". The signature is written in a cursive style.

Muntu Davis, MD, MPH
President, California Conference of Local Health Officers