



**National Cattlemen's
Beef Association**

September 12, 2016

Docket No. APHIS-2016-0023
Regulatory Analysis and Development
PPD, APHIS, Station 3A-03.8
4700 River Road, Unit 118
Riverdale, MD 20737-1238

**RE: APHIS-2016-0023, Notice of Request for Approval of an Information
Collection; National Animal Health Monitoring System; Antimicrobial Use Studies**

The National Cattlemen's Beef Association (NCBA) appreciates the opportunity to provide comments to the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) on their request for Office of Management and Budget (OMB) approval for a National Animal Health Monitoring System (NAHMS) based information collection process for antimicrobial drug use data in cattle feedlots and swine operations. As the largest and oldest national trade association for cattlemen and women in the United States, NCBA is committed to ensuring cattle health and well-being and to producing high quality, safe beef for consumers. Since 1987, NCBA has promoted responsible antimicrobial drug use practices through *A Beef Producers Guide for the Judicious Use of Antimicrobials in Cattle* and subsequently, through the Beef Quality Assurance (BQA) program.

Antimicrobial drugs are used to prevent, control and treat bacterial diseases affecting animals and are just one tool that farmers and ranchers use to keep their animals healthy. Cattlemen and women join with the larger livestock community in working together to continuously improve, through quality assurance programs, the ways that antimicrobial drugs are being used in food-producing animals. Antimicrobial stewardship refers to the responsible and appropriate use of antimicrobial drugs to improve health, reduce microbial infections, decrease the spread of infectious disease agents, and mitigate the development of resistant bacteria. NCBA takes the commitment to promote antimicrobial stewardship practices very seriously and seeks to educate our members, consumers, regulators, legislators, and the general public on the merits of BQA-directed, responsible antimicrobial drug use within the diversified sectors of the beef cattle industry.

NCBA understands the desire for antimicrobial drug use surveillance as directed by the President's *National Action Plan to Combat Antibiotic Resistant Bacteria*. We believe that USDA-APHIS, the federal agency responsible for livestock disease prevention, control and surveillance, is the appropriate entity to lead in the efforts for an on-farm antimicrobial drug use surveillance process. The National Animal Health Monitoring System has been recognized by OMB as a statistical unit under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) of 2002 and is also a well-known and trusted data-collection vehicle to farmers and ranchers. The NAHMS collected data will be kept confidential and all personal information will be protected by CIPSEA from disclosure through Freedom of Information Act (FOIA) requests. An important factor to ensure voluntary participation in any type of on-farm antimicrobial drug use data collection process is that the anonymity of the participants is

assured and that data security is strictly guarded. We believe that the NAHMS can provide the necessary confidentiality and data security for on-farm antimicrobial drug use data collection.

In creating a survey-based approach to the collection of on-farm antimicrobial drug use data using NAHMS, USDA-APHIS should take into consideration the following points of view:

- The *Federal Register* notice informs that the survey questions will be administered by National Agricultural Statistics Service (NASS) personnel. We recommend the use of USDA-APHIS veterinary medical officers to aid in the administration of the proposed cattle feedlot surveys. This direct interaction with a veterinarian provides much needed clarity for such technical topics and ensures that the appropriate individuals on each feedlot are responding to the survey questions. Interaction with a survey-administrator who is well-informed on the survey topic should result in more accurate and meaningful data collection and in a higher rate of voluntary participation. We believe that the public reporting burden for the survey may be significantly underestimated in this notice and only possible with the assistance of a well-informed survey administrator working with the participants to efficiently complete the survey.
- The qualitative cattle feedlot antimicrobial use survey should focus on questions that are relevant to the objective of assessing antimicrobial stewardship practices, such as the classes of antimicrobial drugs used, the frequency of drug use, the reasons for drug use, the animal demographics, and the outcomes of the antimicrobial drug use. Highly prescriptive lines of questioning may serve to create confusion and often become exhaustive and burdensome for the survey participants, resulting in inaccurate responses and, in some cases, a lack of participation.
- Survey questions should be relevant to the objective for antimicrobial use data collection and identify those uses that discourage the development of antimicrobial resistance.
- The reporting of survey data related to antimicrobial drug use should clearly separate the medically important antimicrobial drugs from the non-medically important antimicrobial drugs. Additionally, all antimicrobial drugs surveyed in the cattle feedlot questionnaire should have label indications for use in cattle.
- In developing antimicrobial use survey vehicles, consideration should be given to creating ways to incentivize voluntary participation in the survey process through offering opportunities for individual participants to privately benchmark their individual data against blinded, aggregate data from similar size operations. This could facilitate enhanced antimicrobial stewardship re-evaluation and self-improvement.
- Qualitative stewardship survey questions should center on such topics as possessing an established veterinarian-client-patient relationship (VCPR); maintaining written or electronic treatment records; participating in quality assurance programs, such as BQA; maintaining veterinary feed directive (VFD) orders for 2 years; establishing antimicrobial drug treatment protocols for common diseases; adhering to label instructions/indications for drug use; and observing withdrawal times to avoid illegal drug residues in meat.

- Finally, we would recommend that USDA-APHIS seek the input of food animal veterinarians, industry and academic experts to review the draft antimicrobial drug use survey questions for cattle and swine with regard to their relevancy, clarity and content before finalizing the cattle feedlot and swine operations survey documents.

NCBA supports transparency in data reporting and accurate data collection using sound scientific and statistical principles. All data should be collected in response to a well-defined objective or purpose. Adequate funding of data collection projects is necessary to ensure a sound process that produces accurate results. When assessing on-farm antimicrobial drug use data, USDA-APHIS needs to avoid focusing on gross volumes of drug use reported. The agency should seek ways to better identify and reduce inappropriate antimicrobial drug uses rather than benchmarking against preconceived reduction goals. NCBA supports the use of voluntary industry-based antimicrobial drug use data sets, where appropriate. NCBA does not support data collection systems that fail to ensure data confidentiality or data security, are overly burdensome for the participants, or that set goals for gross volume of antimicrobial drug use reduction as a measure of judicious use. Antimicrobial stewardship is a shared goal that can be achieved as a result of all stakeholders working together to practice and promote the responsible use of antimicrobial drugs. Continued research can facilitate an increased awareness and understanding for the mechanisms involved in the development of antimicrobial resistance and direct future actions for solutions to this complex problem.

NCBA appreciates your consideration of our comments regarding the notice for request of OMB approval for the USDA-APHIS information collection process using NAHMS for on-farm antimicrobial drug use data collection. If you have any questions or concerns, please contact Dr. Kathy Simmons, NCBA's Chief Veterinarian, at 202-347-0228 or ksimmons@beef.org.

Sincerely,

A handwritten signature in black ink, reading "Tracy Brunner". The signature is fluid and cursive, with the first name "Tracy" being more prominent and the last name "Brunner" following in a similar style.

Tracy Brunner
President, National Cattlemen's Beef Association