

## American Association of Avian Pathologists (AAAP)

### **Position on the Judicious Use of Drugs Fed to Poultry and the Risks to Human Health**

Audience: AAAP Members and Veterinarians

The American Association of Avian Pathologists (AAAP) is a professional organization of poultry veterinarians and scientists responsible for the health and well-being of commercial poultry, and the protection of public health. The AAAP fully supports antibiotic stewardship efforts and promotes the responsible use of antibiotics in food-producing animals. Upon graduation, veterinarians take a veterinary oath "to swear to use scientific knowledge and skills for the benefit of society through the protection of animal health and welfare, the prevention and relief of animal suffering"; therefore, animal welfare as well as judicious use of drugs is a priority.

The poultry industry goes to great efforts to control disease through farm management, biosecurity practices, and vaccination; however, there are situations where birds do get sick. The AAAP strongly supports the right for a licensed veterinarian to treat a sick animal or flock with an FDA-approved antibiotic to prevent pain and suffering. We also support that, in addition to farm management, the professional judgment of a veterinarian should be used for antibiotic treatment if an animal or flock is at risk of becoming sick with a disease that can be prevented. For further information, please consult the AAAP-AVMA Guidelines for Judicious Therapeutic Use of Antimicrobials in Poultry, which states our policy on use (AVMA n.d.).

Antibiotic use in poultry production can be very confusing and difficult to understand without basic knowledge of modern industry production practices, data collection and research used to govern use, including the following:

- The majority of all U.S. and Canadian commercial poultry operations have oversight by a licensed veterinarian. These veterinarians develop health and disease prevention plans and oversee drug and antibiotic use when necessary.
- Commercial poultry companies legally administer feed-additive antibiotics consistent with current U.S. and Canadian and label instructions. Violations of these feed-additive label claims would result in adulterated feed.
- By December 2016 significant changes will occur to FDA approvals of certain drugs administered in feed or drinking water. Affected drugs will be limited to those deemed medically important to human medicine and no longer approved for growth promotion claims; such drugs will only be available for therapeutic indications either by a veterinary feed directive (VFD) in the feed or prescription via the drinking water. Only bacitracin and flavomycin will be available with growth promotion label indications for poultry as they are not deemed medically important by FDA. Impending changes to FDA drug approvals will insure more veterinary oversight and judicious use of medically important antimicrobials, such as, penicillin, lincomycin, sulfonamides, tetracyclines. These products have a very limited, gram-positive spectrum and are used primarily to control *Clostridium perfringens* which causes a deadly enteric disease in chickens.

- In 2014, the U.S. poultry industry, in collaboration with the USDA National Antimicrobial Resistance Monitoring System, began collecting on-farm bacteria samples to monitor antimicrobial resistance. Participating farms represent 60% of the U.S. commercial chicken industry and 70% of the commercial turkey industry. Data on antimicrobial use is matched with the collection samples as part of this study. The goal is to monitor antimicrobial use and resistance over time; therefore, this is an ongoing study. A similar program has been in place in Canada since 2013 and results are available. All these efforts are part of the World Health Organization Global action plan on antimicrobial resistance to which the U.S. and Canada actively participate. Statements about antimicrobial consumption are often misleading. Often harvested from sales data, these estimates do not necessarily represent the volume consumed nor are considered accurate species-use data. However, numerous researchers are actively collecting and processing information to provide stakeholders with scientific data which will provide a better understanding of current antimicrobial use, and support future decision making policies.

The AAAP fully supports and promotes the responsible use of antibiotics in food-producing animals. In addition to reducing pain and suffering of animals, there are also a number of other positive benefits from using them, including the following:

- Animal welfare is enhanced because of sick animals being adequately treated to decrease mortality and morbidity, as well as risk of disease transmission.
- Antibiotic use in poultry production enhances sustainability, making it environmentally responsible. Feed additive antibiotics work largely in part by controlling and preventing enteritis, which as a result improves the efficiency of the growing animal. Controlling and preventing disease reduces the number of poultry barns necessary; in addition, there is less use of electricity, water, corn and soybeans, and propane when using an antibiotic tool to prevent these enteric diseases.

The AAAP fully supports the numerous efforts of its members involved in AMU reduction initiatives, such as research in the development of antimicrobial alternatives, improvement of preventive control measures, such as vaccines, tools to improve health, comfort and immunity of our birds, and educational programs.

Poultry production is providing a high-quality, readily available and affordable protein source to feed the world. Most cultures in the world consume poultry meat and eggs, and the growing global population will need this resource to help satisfy their nutritional demand. In conclusion, the AAAP supports the FDA Guidance documents 209 (FDA 2012) and 213 (FDA 2013a), as well as the more recently published Veterinary Feed Directive (FDA n.d.) to increase antibiotic use decision oversight by veterinarians involved with food-animal production. Veterinary professionals are in the best position to make these decisions to keep animals healthy, which concurrently improves food safety and reduces the carbon footprint.

#### References:

American Veterinary Medical Association (AVMA). n.d. AAAP-AVMA guidelines for judicious therapeutic use of antimicrobials in poultry, <https://www.avma.org/KB/Policies/Pages/AAAP-Guidelines-to-Judicious-Therapeutic-Use-of-Antimicrobials-in-Poultry.aspx> (3 December 2015)

U.S. Food and Drug Administration (FDA). n.d. Veterinary feed directive, <http://www.fda.gov/AnimalVeterinary/DevelopmentApprovalProcess/ucm071807.htm> (3 December 2015)

U.S. Food and Drug Administration (FDA). 2012. The Judicious Use of Medically Important Antimicrobial Drugs in Food-Producing Animals. Guidance for Industry #209, <https://www.avma.org/KB/Policies/Pages/AAAP-Guidelines-to-Judicious-Therapeutic-Use-of-Antimicrobials-in-Poultry.aspx> (3 December 2015)

U.S. Food and Drug Administration (FDA). 2013a. New Animal Drugs and New Animal Drug Combination Products, Administered in or on Medicated Feed or Drinking Water of Food-Producing Animals: Recommendations for Drug Sponsors for Voluntarily Aligning Product Use Conditions with GFI

#209. Guidance for Industry #213, <http://www.fda.gov/downloads/AnimalVeterinary/GuidanceComplianceEnforcement/GuidanceforIndustry/UCM299624.pdf> (3 December 2015)

U.S. Food and Drug Administration (FDA). 2013b. FDA cautions in interpretation of antimicrobial resistance data, <http://www.fda.gov/AnimalVeterinary/NewsEvents/CVMUpdates/ucm348794.htm> (3 December 2015)