



March 4, 2019

HB 652 Agriculture - Use of Antimicrobial Drugs - Limitations and Reporting Requirements - OPPOSE

Chairman Barve, Vice Chair Stein, and members of the Environment and Transportation Committee,

The Maryland Veterinary Medical Association acknowledges that SB 471/ HB 652 is a well-intended attempt to reduce antibiotic resistance in humans but does not take into consideration several important points that affect food animal welfare and the impact on veterinarians and the practice of veterinary medicine in the State of Maryland.

Representatives of the Maryland Veterinary Medical Association have reviewed SB471 and HB652 and provide the following points for your consideration addressing the proposed amendment and further concerns in enacting this legislation.

The Maryland Veterinary Medical Association supports the amendment to remove the restrictions to Dry Cow Therapy for the following reasons:

1. Appropriate dry cow therapy reduces mastitis risk in lactating cows and therefore reduces total antibiotic usage during the actual lactating or milk producing cycle.
2. Restricting or forbidding dry cow therapy eliminates the most effective treatment protocol for the veterinarian to improve antibiotic stewardship in the herd.
3. Labeled Use and restrictions for Veterinarians already exists in current Federal Regulations.
4. Specific and localized Use of Antibiotics for the purpose of eradicating Mastitis targets only mammary tissue with better efficacy and less overall systemic exposure.

The Maryland Veterinary Association would also add to the debate that SB 471/ HB652 fails to recognize several existing practices involving Veterinary oversight in agricultural communities and its use of antibiotics.

1. Veterinarians are licensed experts addressing the health of the herd and adhere to all Federal requirements including those recently updated. SB471/HB652 attempts to supersede Federal mandates leaving the Veterinarian in a conflicted position for food animal treatment and welfare.
2. As of January 2017, the use of antibiotics to promote weight-gain or feed efficiency have been eliminated in the agricultural communities by FDA sanctions. It must be understood that a Feed Directive is NOT a prescription. A fed antimicrobial product is a manufactured product distributed by a feed company. Feed companies do not operate as pharmacies. The Veterinarian must provide a prescription for a specific medication to manage a specific disease.

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3. The Veterinarian is the best resource to develop treatment protocols to ensure the health and welfare of herd.

4. Required reporting by Veterinarians in the State of Maryland would be an unnecessary burden to rural veterinarians, recognizing there are only 30 Bovine practitioners in the State of Maryland and only 2 Swine practitioners. In addition, the cost to institute a program through the

Department of Agriculture has been estimated to be \$260,000 with additional needs to provide sustainable management, funds and enforcement over the next few years.

5. The 21-day restrictive use of antibiotics put forth in the Bill is arbitrary. This restriction does not consider labeled use, herd health considerations and the Veterinary Practice Act that dictates the medical treatment of animals.

6. SB 471/HB652 does not address the Producers ability to purchase prescription antibiotics outside of Maryland or through National companies.

The American Veterinary Medical Association and the Food and Drug Administration have indicated that therapeutic use of antibiotics includes disease treatment, control, and prevention. Sometimes the best way to achieve optimal health outcomes with the lowest overall usage of medically important antibiotics is through the control and prevention of disease. Veterinarians are best suited to institute this goal and should not be inhibited in this process.

In summary, the MDVMA feels the actual consequence of SB 471 and HB 652 will be that it removes the veterinarian's professional judgement and experience from being utilized, which is exactly the group of trained professionals that need to be involved with making antimicrobial usage decisions. Most food animal veterinarians are at the front line of where the regulations intersect with real world consequences, and have an overall understanding of how this impacts animal health, animal welfare, and any potential impact on public health. To restrict and dictate the use of antimicrobials by licensed veterinarians contradicts scientific and medical knowledge.

For these reasons, the MDVMA opposes SB 471 and HB 652. We encourage the Committees in both House and Senate to consider amendments reflective of our positions laid out above.

Sincerely,

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