

VII. Environmental Impact

The proposed ban on subtherapeutic uses of medically important antibiotics likely will have little or no adverse environmental impact. Although the industry claims that halting all subtherapeutic uses of antibiotics might increase the amount of waste produced by animals, they provide little, if any, evidence to support their claim. Indeed farmers may find that raising livestock under less crowded conditions is an effective way to reduce antibiotic use. Less intensive farming could lead to less concentrated animal waste, thereby providing an environmental benefit. In addition, since this petition does not request a ban on all growth promotants, the action requested here may merely result in a substitution of the type of growth promotants used, which likely will have no net adverse environmental impact. The FDA should monitor increases in use of other antimicrobials (or other methods) that are substituted for the banned antibiotics and ensure their safety.

With regard to the microflora environment, ending the subtherapeutic use of certain antibiotics in livestock would remove an unnatural pressure on bacteria that promotes the prevalence of antibiotic resistance.

VIII. Conclusion

The FDA should ensure that agricultural uses of antibiotics do not endanger the public health by rescinding current approvals that permit the subtherapeutic use in livestock of antibiotics that are used in (or related to those used in) human medicine. That use of antibiotics leads to the development of antibiotic-resistance that could cause bacterial infections that are difficult or impossible to treat.

IX. Certification

The undersigned certify that, to the best of their knowledge and belief, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to the petitioners which are unfavorable to the petition.

Respectfully submitted,



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