Scientists call for the federal government to implement policy restricting the use of antibiotics in animal agriculture.

The Honourable Marjorie Michel, Minister of Health
The Honourable Heath MacDonald, Minister of Agriculture and Agri-Food Canada
The House of Commons
Ottawa, Ontario K1A 0A6

Dr. Harpreet Kochhar, President of the Canadian Food Inspection Agency, 1400 Merivale Road, Tower 1
Ottawa, Ontario K1A 0Y9

Dear Ministers Michel and MacDonald, and President Kochar,

As scientific and medical experts from across Canada, we are writing to express our concerns about the overuse and misuse of antibiotics/antimicrobials in animal agriculture. We urge you to address this critical issue for the following reasons:

- Currently, ¾ of antibiotics used are given to farm animals, often administered in animal feed, to prevent rather than treat infections and disease.[1]
- The World Health Organization (WHO) has identified antimicrobial resistance (AMR) as a significant public health threat and evidence indicates the threat of AMR will continue to grow.[2]
- Canada still allows routine, prophylactic antimicrobial use (AMU) in farmed animals.[3]
- Canada distributed the 6th highest quantity of antimicrobials for use in animals in 2018, compared to 31 European countries.[4]
- AMR is estimated to have caused over one million deaths worldwide in 2019; if no action is taken, this toll may rise to 10 million by 2050, resulting in a cumulative cost of $100 trillion to the world economy.[5]

[1] https://www.canada.ca/content/dam/hc-sc/documents/services/drugs-health-products/canadian-antimicrobial-resistance-surveillance-system-2020-report/CARSS-2020-report-2020-eng.pdf
[2] https://www.who.int/news/item/15-05-2023-new-who-report-highlights-progress-but-also-remaining-gaps-in-ensuring-a-robust-pipeline-of-antibiotic-treatments-to-combat-antimicrobial-resistance-(amr)
[3] https://www.canada.ca/content/dam/hc-sc/documents/services/drugs-health-products/canadian-antimicrobial-resistance-surveillance-system-2020-report/CARSS-2020-report-2020-eng.pdf
[4] ibid
[5] https://www.naturallivestockfarming.com/wp-content/uploads/2015/09/Antibiotics-UK-dec-2014-Review-paper-on-health-wealth1.pdf

- In Canada, AMR is estimated to cost 396,000 lives, $120 billion in hospital costs and $388 billion to Canada's GDP by 2050, if left unaddressed.[6]
- Failing to stem the tide of antimicrobial resistance also jeopardizes the safety of procedures we rely on in modern medicine including transplantation, chemotherapy, and even child delivery.[7]

Antibiotics/antimicrobials are routinely used in animal agriculture to compensate for systems that prioritize production goals over good animal welfare. These intensive systems are the most common methods for raising food animals today, yet an overwhelming body of research indicates antimicrobials can be reduced when improvements to housing conditions, and animal husbandry and management practices are implemented. Changing these conventional practices to support a reduction in AMU requires stronger policy mandates and action from government along with support for producers from veterinary expertise.

World Animal Protection's recent Executive Summary report, based on hundreds of peer-reviewed scientific research and articles, shows how poor animal welfare practices are linked to high levels of AMU. The report demonstrates how farming practices that promote animal well-being can significantly reduce AMU.

In 2021 Prime Minister Trudeau asked Health Minister Duclos to *"Work with partners to take increased and expedited action to monitor, prevent and mitigate the serious and growing threat of antimicrobial resistance and preserve the effectiveness of the antimicrobials Canadians rely upon every day."*[8]

Although Canada released its updated Pan-Canadian Action Plan on Antimicrobial Resistance in June of 2023, which includes a commitment to collect better data on AMU, to date, there is no new funding to directly support the plan's activities, and it does not indicate it will track AMU on farms. This means the amount and type of antibiotics used, along with the reasons for doing so, are not known. Without this data, the most effective policy decisions to support AMU when an animal is sick (therapeutic use), or when disease spread from infected animals nearby is likely (metaphylactic use), and restrict prophylactic use when disease is not present or likely, cannot be made. Canada could follow the leadership of other jurisdictions. For example:

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[6] https://cca-reports.ca/reports/the-potential-socio-economic-impacts-of-antimicrobial-resistance-in-canada/
[7] ibid
[8] https://www.pm.gc.ca/en/mandate-letters/2021/12/16/minister-health-mandate-letter

- The EU banned the prophylactic use of antibiotics in 2022.[9]
- Denmark - one of the world's largest pork exporters - reduced AMU by 60% by 2012 with no negative effects on productivity. They have implemented a "yellow card" system, with sector-specific antimicrobial use targets and penalties for non-compliance.[10]

For all these reasons we ask you to:

- Commit to phasing-out the prophylactic use of antimicrobials in farming in all but exceptional cases (e.g. outbreaks or surgical prophylaxis) through specific changes and improvements in animal welfare management.
- Remove regulatory barriers to obtaining new antimicrobial alternatives and vaccines, and support and facilitate research, development and adoption of new vaccines and antimicrobial alternatives *(see World Animal Protection's recent full report for guidance)*.
- Develop and implement a central, national surveillance system to facilitate the mandatory reporting of antimicrobial sales and use by veterinarians, pharmacies, feed mills and farmers, and integrate or build upon sector specific surveillance systems already in use.
- Immediately prohibit the prophylactic use of Category 1 antibiotics in farm animals nationally, as Quebec implemented provincially in 2019.

We fully recognize as Ministers of Health and of Agriculture, and as Director of the CFIA, the concerns and requests noted in this letter fall outside the mandate of any one portfolio independently. However, we ask that you work together to lead and coordinate a coalition to fund a sustainable and serious response to the Pan Canadian Action Plan in order to achieve the necessary changes outlined in this letter.

Thank you for your attention to this important matter.

[9] https://ec.europa.eu/commission/presscorner/detail/en/MEMO_18_6562
[10] https://www.nature.com/articles/486465a