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July 10, 2012

David Dorsey, J.D.
Acting Associate Commissioner for Policy and Planning
Food and Drug Administration
7519 Standish Place
Rockville, MD 20855

Re: FDA-2010-N-0155: Veterinary Feed Directive; Draft Text for Proposed Regulation

Dear Mr. Dorsey:

The Association for Professionals in Infection Control and Epidemiology (APIC) applauds the efforts of the Food and Drug Administration (FDA) to streamline the Veterinary Feed Directive (VFD) program, and we appreciate the opportunity to provide input on the draft proposal. APIC is a nonprofit, multi-disciplinary organization representing over 14,000 infection preventionists (IPs), whose mission is to create a safer world through prevention of infection. Our comments primarily reflect the views of our members who rely on the integrity of antibiotics to treat and prevent infections in humans and ensure patient safety.

APIC supports our veterinary colleagues in their efforts to provide oversight for the judicious use of antibiotics in food animals, but we are also sensitive to the increased burden the new recommendations will place on veterinarians and those entities that support them. We encourage the FDA to support veterinarians in providing the supervision for prescribing practices and the provision of accurate documentation of administrative procedures that will be necessary to fully implement the VFD program. However, APIC opposes the proposal to reduce the recordkeeping requirement to one year, and urges FDA to retain the current two-year requirement in order to ensure an accurate historical record for review during farm inspections.

APIC looks forward to continuing to work with the FDA as it carries out its mission to protect and promote the public health by encouraging the judicious use of antibiotics in food animals.



Sincerely,

Michelle Farber

Michelle Farber, RN, CIC
2012 APIC President