

# For the Record

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Straight talk about antibiotic use in food animal production presented by ALPHARMA Inc., Animal Health

## HAS IT GROWN IMPOSSIBLE TO AGREE TO DISAGREE?

The School of Nutrition Science and Policy at Boston's Tufts University—whose medical school was one of the original critics of farm antibiotic use—takes a portion of its mission from the words of the late former university president Jean Mayer. “Nutrition is not a discipline,” he once wrote. “[It is an agenda.](#)”

The academic nutritionist's focus on hard science and experimentation, Mayer believed, couldn't stand in the way of—in fact, should be yoked into service with—an “equally important heritage:” [Social activism](#) to feed people, feed them adequately, and feed them all.

Mayer was echoing the sentiment of much of “post-modern” academia, a push growing out of '60s campus radicalism to make not only the liberal arts schools of American universities, but also their physical science counterparts, into more than scientific observers—into social activists. That metamorphosis from centers of learning into centers of social change—characterized by universities adding “...and policy” to the names of science departments—gave birth to numerous publicly funded “centers.” One such: Baltimore's Johns Hopkins School of Public Health and its “[Center for a Livable Future](#),” which since March 2005, has collected \$3.4 million in grants from the behemoth [Pew Charitable Trusts foundation](#) to study concentrated animal feeding operations and “produce a series of thoughtful recommendations on ways to mitigate the negative impacts of industrialized livestock production.”

### SCIENCE IN THE SERVICE OF IDEOLOGY?

When the resulting Pew Commission on [Industrial Farm Animal Production](#) releases its anticipated report later this month, it has promised to incorporate science into a [set of recommendations](#) to change how producers produce meat, milk and eggs, including their use of antibiotics. The aim? To protect the



Photo courtesy USDA

Will the upcoming Pew Commission on Industrial Farm Animal Production recommendations proceed from [an ideological assumption](#) that only certain forms of farming are environmentally friendly, compassionate, healthy and socially just?

environment, public health, animals and the poor. On the need for that, most everyone on both sides of the issue can agree.

Unfortunately, several indications uncovered over the 2.5-year period the commission has been at work suggest it also may be trying to do the impossible: Enlist science selectively into bridging an ideological gap about what agriculture should look like.

Science is about disagreement. If the Pew commission succeeds in selling the public and regulators on some commissioners' ideology that there's no more room for argument as to how safe, healthy, compassionate and just agriculture must look, even where science doesn't agree, then truth will be the worse for it.

### Also in this issue

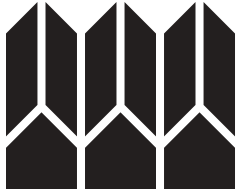
- Has the upcoming Pew commission study of animal agriculture maintained the science-based, transparent discovery process it set out to fulfill?
- Pew's funding history does not suggest sympathy for profit-driven enterprise.
- A challenge to the commission from agriculture: Deliver what you promised.

### For the record...

The Pew-funded commission on large-scale animal agriculture's final recommendations coming this month must let science speak honestly, unobstructed by ideology.

# CAN SCIENCE WITHSTAND PEW?

As animal producers brace for the list of specific recommendations the Pew Commission has promised in order to “mitigate the negative impacts” of animal antibiotic use and other aspects of large-scale confined production, they may come to appreciate the wisdom of Stephen



## PEW COMMISSION ON INDUSTRIAL FARM ANIMAL PRODUCTION

Gaghan, director of the 2005 political thriller *Syriana*. In Washington, D.C., one of Gaghan’s movie characters observes, you’re innocent until you’re investigated.

### COMPREHENSIVE, FACT-BASED, BALANCED?

In pursuing its recommendations regarding large-scale farming’s [environmental impact](#), [manure handling](#), [community impact](#), [animal care](#) and [antibiotic usage](#), the commission promised to enlist teams of experienced and credentialed scientists to review the existing research, report back to the commission, and suggest final recommendations, which the commission will then adapt to make its own.

“The commission will base all its final recommendations on objective scientific research and testimony,” according to communications director Ralph Loglisci.

Each team is charged with drafting a careful review of the existing research on its subject. Though the commission has been promising to release those technical reports since February 2007, as of mid-March only one had seen the light of public scrutiny. And although the commission held two public meetings last year to hear testimony, it ceased them and stopped accepting written comments nearly six months before the public saw that first of the promised technical reports. That has had the effect of preventing public comment on the

science going into the recommendations.

Kay Johnson Smith, executive vice president of Washington’s [Animal Agriculture Alliance](#), the industry group most directly involved with the commission since it discovered its formation, expresses concern the scientific process Pew promised at the outset is not being followed. Although each technical report is supposed to undergo the same peer review and criticism process scientific journals typically require, Johnson-Smith reports doubts have been raised not just by the Alliance, but also by members of the scientific teams themselves about the integrity of that process.

Members of the panel that studied the research on waste handling, for instance, fired a shot across the commission’s bow in February by writing an open letter reminding members they had promised a research process up to National Academy of Sciences (NAS) standards and expressing reservations it was not delivering. (Shortly after the letter was made public, the head of that research team told *For the Record* the commission had addressed the group’s concerns and that the letter was in no way meant to undermine the mission of the commission.)

Nevertheless, Johnson Smith says, others have echoed those reservations, both about absence of effective peer review, as well as the commission gradually down playing the importance of the technical reports in its build-up to the final report and recommendations.

“The technical reports are one small piece” of the commission’s overall mission, executive director Bob Martin told a Feb. 29 briefing before congressional staffers.

### LEGITIMIZING PATINA OF SELECTIVE SCIENCE?

Whether the final report and recommendations will offer the balance the commission advocated is impossible to say until that science is unveiled to the

## BY THE COMPANY THEY KEEP?

Though it promises its grants go to “well-considered” initiatives backed by “rigorous, nonpartisan research,” the \$6 billion Pew Charitable Trusts’ \$160 million in grant support last year shows a pattern of giving that tends heavily to support organizations opposing many of modern farming’s practices and beliefs. Past recipients include several organizations belonging to the Keep Antibiotics Working activist coalition, which has been lobbying for federal legislation to outlaw most uses of farm antibiotics, including Environmental Defense, the Humane Society of the United States and others.



## TOP PEW FUNDING TO ACTIVIST GROUPS

■ Tides Foundation & Tides Center	\$119 million (1990-2002)
■ National Environmental Trust	\$35.9 million (1995-2003)
■ Oceana	\$25.7 million (2001-2005)
■ Earthjustice	\$22.3 million (1995-2005)
■ National Audubon Society	\$15.3 million (1991-2000)
■ U.S. Public Interest Research Group	\$14 million (1997-2005)
■ Natural Resources Defense Council	\$11.6 million (1991-2000)
■ World Wildlife Fund	\$10.7 million (1989-2002)
■ SeaWeb	\$8 million (1996-2002)
■ Environmental Defense	\$6.9 million (1990-2005)

Source: Center for Consumer Freedom.

## FARM ANTIBIOTIC TECHNICAL REPORT MISSING KEY COUNTERVAILING SCIENCE

In the [58-page technical report](#) on antibiotic use in farming, Johns Hopkins Center for a Livable Future advising professor Ellen Silbergeld, PhD, argues for banning antibiotics as growth promoters. She and her closely affiliated Johns Hopkins co-authors over-rely on European data now nearly a decade old, cite no U.S. data from the National Antimicrobial Resistance Monitoring System—dismissing it as “too difficult” to discern trends from—and ignore most of the key scientific reviews and risk assessments that don’t support removing antibiotics from U.S. use. Some flawed conclusions include:

**ANTIBIOTIC RESISTANCE IS INEVITABLE** when low-level antibiotics are used. In fact, a [2004 journal review](#) questioned this theoretical pillar, noting few studies have actually measured how drug levels in the gut affect bacterial populations. Approved growth-promotion levels of some antibiotics may in fact be high enough to prevent evolution of resistance. A universal statement that growth promoting levels increase the frequency of resistance is not only not proven, it’s not true. Though Dr. Silbergeld

cites the article, she doesn’t address the argument, instead simply dismissing the scholars as “industry consultants.”

**HUMAN BACTERIA GROW RESISTANT** after animal antibiotics come on the market. Dr. Silbergeld offers evidence that antibiotic resistance in human bacteria historically follows the pattern of antibiotic use on farms in Europe. However, she wholly ignores the growing body of scientific literature suggesting the contrary.

For instance, a [2007 review](#) in the *International Journal of Antimicrobial Agents* showed human infections caused by bacteria with relevant resistance to the animal antibiotics banned in Europe were “vanishingly rare there” even before the ban. Meanwhile, in parts of Europe, the prevalence of infections with such organisms [has increased](#) in the decade since the ban. Dr. Silbergeld ignores it.

**LOW-LEVEL ANTIBIOTICS** offer no benefits. Dr. Silbergeld completely ignores the science demonstrating low-level antibiotics may improve food safety by controlling infection—the 2007 European review suggests that may explain why human *Cam-*



Johns Hopkins professor of environmental health sciences Ellen Silbergeld, PhD, was co-author of a study [featured last year in For the Record](#). Distributed by Johns Hopkins’ press office and widely reported in the media, the study relied on flawed assumptions about poultry economics to incorrectly argue antibiotics in poultry production actually lose money for producers. The authors continue to insist their erroneous conclusion provides more reason antibiotics should be banned. For more, see [AntibioticTruths.com/fttr/fttr\\_apr07.pdf](http://AntibioticTruths.com/fttr/fttr_apr07.pdf)

*pylobacter* infections there have risen since farm antibiotics were banned. She also fails to cite a [2006 review of more than 750 studies](#) which argued similarly, as well as a growing body of literature finding organic meat, milk and eggs are more likely than conventional products to be contaminated with bacteria.

light. Johnson Smith notes despite early assurances from the commission that the Alliance would be able to offer candidates for the study teams and the [commission itself](#), it appears no input from conventional animal agriculture has been allowed in choosing panelists or scientists.

Meanwhile, the [one technical report](#) available at press time—a review of farm antibiotic use and theoretical links to human antibiotic failures—was bylined not by an interdisciplinary team of scientists, but by Johns Hopkins professor of environmental health sciences [Ellen Silbergeld](#), PhD, an

open critic of farm antibiotic use, along with two of her newly minted environmental sciences doctoral students. Dr. Silbergeld’s report repeats many of the unsupported theories about antibiotic use which have been directly challenged by other scientific studies, even while she gives that dissenting science virtually no reasoned debate.

Johnson Smith is not alone in voicing concern the eventual report won’t really use good science to make meaningful recommendations, but instead mask ideological biases behind a legitimizing patina of selective science.

“They have claimed to be open and transparent, yet many of the actions that have been taken over the last two years continue to fan that concern,” she says.

Meanwhile, the [perpetual PR machine](#) against farm antibiotics was openly gearing up, preparing to leverage the commission’s aura of prestige later this month.

“The added voice of the Pew Commissioners...shows the need to stop factory farms from squandering the effectiveness of our antibiotic supply,” Richard Wood, chairman of the activist group Keep Antibiotics Working told the media in January.



### For the record...

Johns Hopkins’ Center for a Livable Future also uses its public health school affiliation to coordinate the [Meatless Monday](#) campaign. Its website and newsletter urge Americans to cut their meat consumption on the grounds it’s healthier for them. However, the [half million dollar](#) annual pricetag for the initiative is quietly provided by the [same source that funds](#) the Global Resource Action Center for the Environment, an environmental [activist group](#) that uses zoning laws and public protest to prevent farm start-ups and expansions.

### For the record...

The Pew-funded technical report on antibiotic use in farm animals, which urges a ban on their use for growth promotion, can be viewed by visiting [AntibioticTruths.com](http://AntibioticTruths.com)

**Principal Points**  
**Pew Commission: No room**  
**for disagreement?**  
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- The Pew Commission on Industrial Farm Animal Production has raised questions in the industry as to whether it is remaining open to all the science behind issues like antibiotic use in farming.
- The commission, although it held hearings early in the process, has not opened up its scientific reviews to the public and invited comment on them in time to incorporate those comments prior to releasing its final recommendations.
- Those final recommendations are expected to be widely distributed in the media, as well as used to lobby for legislation and regulation, including legislation to end the use of many farm antibiotics.
- The commission's technical report on farm antibiotics and antibiotic resistance relies on out-dated European data and ignores most of the key scientific reviews and risk assessments that don't support limiting their use in the United States.

**For the Record**, sponsored by a grant from ALPHARMA Inc., Animal Health, is designed to help unite the industry and provide a unified, rational message on behalf of producers whose freedom to use safe, effective, economical production methods is at stake. Working together, we can set the record straight on antibiotics.

Questions or comments? E-mail Steve Kopperud at [skopperud@poldir.com](mailto:skopperud@poldir.com) or editor Mike Smith at [CustomMedia@Food360.com](mailto:CustomMedia@Food360.com). Read past issues or link to more information on this issue at [www.AntibioticTruths.com](http://www.AntibioticTruths.com).

# OUR CHALLENGE TO THE PEW COMMISSION

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As part of our mission to communicate science-based agricultural information to the public, the Animal Agriculture Alliance has been actively engaged with the Pew Commission on Industrial Farm Animal Production since before its existence was made public more than two years ago. We have stayed involved to the fullest extent possible on behalf of our coalition of farmers, producer organizations, suppliers, packer-processors, industry and retailers.

Now, as we approach the culmination of the thousands of hours and millions of dollars that went into this undertaking, the Alliance would like to again take the opportunity to challenge the commission to fulfill its own stated mission: To be comprehensive in its scope, fact-based in its investigations, balanced in its examination and thoughtful in its recommendations.

## PROOF'S IN THE PROCESS

We recognize it's a mammoth challenge. But it's certainly possible. As an organization devoted to science, we witness the same task being accomplished every day in the universities and private research labs throughout the world. They accomplish it by rigorous devotion to the rules of the scientific process and full, open transparency in how that process is followed. They stay faithful to accepted practice in peer review of scientific studies to ensure accuracy, adherence to method and constructive criticism by fellow scientists—including those who disagree with their conclusions. They consider opposing science openly and honestly, willingly holding up their own work to the clarifying light of open science-based criticism. They set out on the long journey of honest scientific discovery with as little ballast to hold them back as possible, whether that's financial conflicts of interest or preconceived personal beliefs, no matter how deeply held.

Have commission members followed that process—so critical to accuracy, honest scholarship and, ultimately, meaningful recommendations? The short, unfortunate

answer is we just don't know. To our disappointment, we have over the last two years witnessed shortcomings.

Some authors of the scientific technical reports

that will underpin the eventual recommendations—thoughtful and respected scientists—have raised questions about

how those studies will be used.

Selection of commission members and the scientific teams was done

with no industry input. Early indications the commission would gradually release its findings over the course of time in order to actively solicit feedback haven't been fulfilled. At this point in time, we've been left with little choice but wait until the final report is released to the public—along with its recommendations for action and policy changes, right or wrong.

## AN OPPORTUNITY NOT TO BE WASTED

Today's new-found public interest in food, farming and nutrition has handed the commission nearly unprecedented access to the ear of not only Washington, but also the American public. It gives them an opportunity seldom presented, in which the nation is ready to listen to what it's going to take to feed and clothe not only today's increasingly demanding population, but tomorrow's growing one. To squander that opportunity to meaningfully come together and solve those problems because the process was short-cut or some members were blinded to all possibilities because of ideological allegiances, would be a waste more tragic than any short-term public-relations hits animal agriculture might suffer. We challenge the commission to deliver what it promised: Let's make this the beginning of an honest dialog, not the end.

