



PEW COMMISSION ON  
INDUSTRIAL FARM  
ANIMAL PRODUCTION

July 16, 2009

Dr. W. Ron DeHaven, CEO  
American Veterinary Medical Association  
1931 N. Meacham Road, Ste. 100  
Schaumburg, Illinois 60173-4360

Dear Dr. DeHaven:

Your letter to members of the House of Representatives has been forwarded to us since you comment about the work of the Pew Commission on Industrial Farm Animal Production (PCIFAP). We want to take this opportunity to address some of your concerns.

The Pew Commission on Industrial Farm Animal Production was established by The Pew Charitable Trusts to develop consensus recommendations to solve the issues raised by concentrated animal feeding operations, or industrial farms, in the areas of public health, environment, animal welfare, and rural communities. It was comprised of members from diverse professional backgrounds, experiences, and knowledge, including: medicine, veterinary medicine, production agriculture, the food service industry, public health, rural sociology, state and federal policy, religion, nutrition, and ethics. Former United States Department of Agriculture Secretary Dan Glickman was a member.

During the course of our inquiry, the Commission conducted 11 meetings that included two public meetings where we heard from approximately 400 members of the general public, academics, veterinarians, and representatives of industrial animal agriculture. We visited industrial facilities in four states to view swine, egg, broiler, beef cattle, and dairy production. We consulted more than 170 peer-reviewed reports, commissioned eight technical reports on topics before the Commission, and received thousands of pages of information from all interested parties, including the animal agriculture industry, as well as relying on the expertise of the Commissioners themselves. We met for more than 250 hours, 50 hours with industry representatives present, more than any other single interest group.

All of the Commission's recommendations were developed by consensus, which is why some recommendations have more detail than others. In essence, the Commission developed details as long as consensus agreement could be reached. In addition, the Commissioners did not feel we should be too prescriptive; rather our role was to provide general guidance and policy goals with some background of the reasoning that went into the recommendations. We recognized there are several routes to achieve our primary recommendations, which was what we deemed to be most important. We understand this differs considerably from the AVMA process on resolutions, which is not consensus-oriented.

In addition, we would like to comment on the process the Commission used with respect to technical reports and academics since you termed our process “biased”. The Commission sought eight, separate technical, peer-reviewed reports based on the process used by the National Academy of Sciences. The Commission sought a broad range of academic experts to write on the issues and solicited names from representatives of the industrial food animal industry. While the Commission approached academic experts recommended by the industry, the industry discouraged those same experts from participating in the Commission’s work.

In a related area, the lack of leadership by the AVMA to push for changes in production practices to reduce the need for the non-therapeutic use of antibiotics has been particularly disappointing. Even though the various guides to the judicious use of antibiotics that are distributed by the Food and Drug Administration’s Center for Veterinary Medicine and the various industry associations urge caution, there is no evidence that the AVMA has taken any action to implement meaningful changes. Failure as licensed professionals to serve as the gatekeepers in how antibiotics are used in the food supply threatens public health.

The lack of transparency in the association’s interactions with the Food and Drug Administration’s Center for Veterinary Medicine and the industry associations designed to promote the current system of animal production is also troubling.

The Commission concluded, generally, that the present system of industrial farm animal production is not sustainable and presents an unacceptable level of risk to public health and damage to the environment, is harmful to the animals housed in the most restrictive confinement systems, and deters long term economic activity in the communities in which the operations are located. In addition, we found that the industry often has inappropriate influence at every turn: in academic research, agriculture policy development, government regulation and enforcement, and AVMA policy development.

Thank you for the opportunity to share our concerns with you directly. We would appreciate receiving a copy of your “in-depth” analysis of the Commission’s full report and executive summary that you indicated would be completed “in the near future”.

Sincerely,



John W. Carlin  
Chairman  
Pew Commission on Industrial Farm Animal Production  
Former Kansas Governor and Archivist of the United States



Michael Blackwell, DVM, MPH  
Vice Chairman  
Pew Commission on Industrial Farm Animal Production  
Former Dean, College of Veterinary Medicine, University of Tennessee/Knoxville