



National Association of County & City Health Officials

The National Connection for Local Public Health

December 13, 2023

Michal Freedhoff
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
Environmental Protection Agency
1201 Constitution Ave NW Washington,
DC 20004

Re: Docket EPA-HQ-OPP-2023-0445; Pesticides: Concept for a Framework to Assess the Risk to the Effectiveness of Human and Animal Drugs Posed by Certain Antibacterial or Antifungal Pesticides

Dear Assistant Administrator Freedhoff,

On behalf of the National Association for City and County Health Officials (NACCHO), I write to provide comment on the Concept for a Framework to Assess the Risk to the Effectiveness of Human and Animal Drugs Posed by Certain Antibacterial or Antifungal Pesticides. NACCHO is the voice for the over 3,300 local health departments across the country. These city, county, metropolitan, district, and tribal departments work every day to protect and promote health and well-being for all people in their communities. In response to the concept for a framework, NACCHO offers recommendations and comments pertaining to infection prevention and control, antimicrobial resistance (AMR), and antimicrobial stewardship.

NACCHO recognizes that AMR represents a growing threat to the health of the public. The World Health Organization, Centers for Disease Control and Prevention, and the White House have identified AMR as a serious threat and called for urgent, coordinated action across all government sectors to address the issue. NACCHO appreciates EPA's efforts to further understand how potential solutions, research, or mitigation approaches to reduce the spread of AMR can impact health outcomes.

Local health departments across the United States are actively engaged in responding to AMR and promoting stewardship. They collect and analyze data to identify outbreaks, investigate reportable diseases, and prevent the spread of infections in community and healthcare settings. Local health departments often facilitate coordination among agencies to improve antimicrobial stewardship and prevent the spread of antimicrobial-resistant organisms. Similarly, federal public health policies must therefore be integrated with environmental and farming policies. NACCHO urges that the considered harms in this concept document highlight the significance of a collaborative One Health approach and that the lens of antimicrobial stewardship is strongly considered to reflect both individual and societal level harms.¹

Local health departments implement containment strategies to stop the spread of new or targeted AMR. Often serving as conveners and connectors working with healthcare providers, local partners, and other health departments, local health departments lead coordination efforts, share best practices,

¹ [One Health Basics](#) | [One Health](#) | [CDC](#)

provide education, and support the implementation of antibiotic stewardship principles in diverse settings. As best practices for evaluating the risks to human and animal health evolve, local health departments should be considered an assessment and management partner.

Given the growing role of local health departments in combatting antimicrobial resistance, NACCHO commends EPA in taking steps to strengthen the evidence base for mitigation approaches to reduce the spread of AMR and urges that this proposed framework be through the lens of antibiotic stewardship. Increased collaboration between local health departments and national, state, and local antibiotic resistance stakeholders is vital to combat AMR.

NACCHO welcomes the opportunity to further engage with EPA and other federal partners to ensure that the efforts of local communities are incorporated in federal infection prevention and control, AMR, and antimicrobial stewardship activities. If you have any questions, please contact Adriane Casalotti, Chief of Government and Public Affairs, at acasalotti@naccho.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Lori Tremmel Freeman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Lori Tremmel Freeman
Chief Executive Officer