

Consumers Union

Center for Science in the Public Interest

July 24, 2008

Richard Raymond, M.D.
Under Secretary for Food Safety
United States Department of Agriculture
1400 Independence Ave, SW
Room 1140, South Building
Washington, D.C. 20250-3700

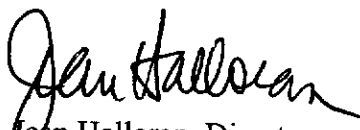
Dear Dr. Raymond,

We are writing to support the USDA's June 2, 2008 decision to rescind Tyson Food's "Raised without antibiotics that impact human antibiotic resistance" label.

In particular, we agree with Food Safety Inspection Service's (FSIS) decision that the routine injection of gentamicin into eggs just prior to hatching does indeed constitute a use of antibiotics during the "raising" of chickens. Tyson argued that its label was not misleading because the term "raised without antibiotics" only refers to the post-hatch phase of the chick's life. A Tyson spokesman "described the vaccinations as a standard practice, as **rules on labels describing how birds are 'raised' typically start from the second day of life**" (bold added).¹ We disagree with Tyson's reasoning. We believe that the average consumer when s/he sees a label that states "Raised without antibiotics," assumes that no antibiotics have been used during the *entire* production process, which would start with the laying of the egg.² And the fact that gentamicin is usually injected into chicken eggs the day before they hatch and remains in the animal's system after hatching clearly means that these chicks are being raised *with* antibiotics.

In sum, we urge USDA/FSIS to maintain the position that, in poultry production, "raising" starts with the laying of the egg. Consequently, a label that states "Raised without antibiotics" should mean that no antibiotics were used after the egg was laid.

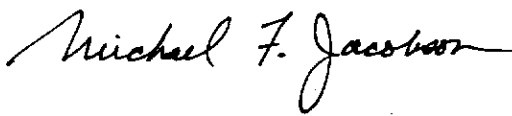
Sincerely yours,



Jean Halloran, Director
Food Safety Initiatives
Consumers Union



Michael Hansen, Ph.D.
Senior Scientist
Consumers Union



Michael F. Jacobson, Ph.D.
Executive Director
Center for Science in the Public Interest

¹ At: <http://www.lancasterfarming.com/node/1292>

² A CSPI survey of 97 purchasers (respondents were on a larger listserv maintained by CSPI) of Tyson "raised without antibiotics" chicken products asked "Tyson injects antibiotics into its chicken eggs, but the amount it injects is trivial. Would you still purchase Tyson's chicken if the amount of antibiotics Tyson injects in its eggs is trivial?" Only 5% answered yes, 62% said no, and 33% didn't know.