ConsumersUnion
POLICY & ACTION FROM CONSUMER REPORTS

April 29, 2013

Dr. Margaret Hamburg
Commissioner
Food and Drug Administration
U.S. Department of Health and Human Services
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Commissioner Hamburg:

We are writing regarding the findings of a new *Consumer Reports* study of bacteria and antibiotic resistance in ground turkey, which is being released on April 30, 2013 (see "Talking Turkey" in the June 2013 issue, **http://www.consumerreports.org/turkey0613**).

Consumers Union, the public policy and advocacy division of *Consumer Reports*, supports the U.S. Food and Drug Administration's (FDA) efforts on Draft Guidance #213, released in April 2012, which asked the livestock and animal drug industries to voluntarily phase out use of antibiotics for growth promotion in food animals over three years. We have also supported legislation to ban the non-judicious use of antibiotics in food production (the Preservation of Antibiotics in Medical Treatment Act). However, the problem of antibiotic resistant bacteria continues to grow.

New findings from *Consumer Reports* underline the seriousness of the problem and indicate that additional action is both needed and would be effective. As you know, approximately 80 percent of antibiotics sold in the United States are used in livestock production. We therefore urge FDA to take additional steps. FDA should restrict use of antibiotics only to the treatment of sick animals. We further urge FDA to disclose in more detail which antibiotics are used on which types of animals, so that problem areas can be better identified and addressed.

Restrict Antibiotics in Livestock Production to Treatment of Sick Animals

Consumer Reports found widespread antibiotic resistance in bacteria in ground turkey. We tested ground turkey for salmonella, staphylococcus aureus, generic e. coli, campylobacter and enterococcus, and found bacteria in 90 percent of the 257 samples tested. More than 90 percent of those bacteria were resistant to at least one class of antibiotic, and more than half were resistant to three or more classes of antibiotics.

Three samples contained methicillin-resistant staphylococcus aureus (MRSA), and eight samples contained multi-drug resistant salmonella. Four salmonella samples were resistant to at least 7, and sometimes 8, antibiotics. The bacteria in our samples were particularly widely resistant to 3 antibiotics highly important to human medicine: tetracycline, ampicillin and streptomycin.

Our study also found that reducing the use of antibiotics appears to be effective in reducing resistance. Bacteria from turkey samples with a "raised without antibiotics" (or similar label

denoting no antibiotic use in production) were resistant to significantly fewer antibiotics than turkey samples without that label. (See graph, CR page 47, **http://www.consumerreports.org/turkey0613**). We have therefore recommended that consumers buy "no antibiotics" products, on the grounds that they would be less likely to encounter highly drug resistant "superbugs."

Even more striking, we found that the bacteria in ground turkey were much more likely to be resistant to antibiotics that are approved for use in turkey production, than to drugs that are not approved for turkey production. This suggests that withholding approval of particular drugs can be an effective method of controlling resistance.

Antibiotic resistant bacteria in poultry and meat can be a direct problem for people if they consume them and become sick, as it can be more difficult to find a drug that works against the illness. Besides gastrointestinal illness, resistant bacteria in poultry and meat may also contribute to the development of resistant extra-intestinal infections like urinary tract infections. Antibiotic resistant bacteria on farms also contribute to the proliferation of antibiotic "superbugs" elsewhere, via farm workers, air, manure, feed and water runoff.

The pervasiveness of resistant bacteria, and the presence of multi-drug resistant pathogens in these tests, underlines the urgent need to reduce use of antibiotics in meat and poultry production. In light of this new data, we urge the FDA to act immediately to prohibit antibiotic use except for treatment of sick animals.

Disclose More Detailed Data on Antibiotic Use in Livestock

In doing this research, it would have been helpful to know not just which antibiotics are approved for use in turkey production, but which ones are actually used, and in what quantities. Such data would help us to assess which antibiotics were having the greatest impact on resistance. We urge FDA to disclose such use data to the extent it can under current law, and support legislation – the Delivering Antimicrobial Transparency Act – that would expand the agency's authority to disclose drug- and species-specific antibiotic use data.

Finally, we understand that as part of the National Antimicrobial Resistance Monitoring System (NARMS) program, information as to whether retail samples were labeled "organic" or otherwise made claims about being "raised without antibiotics" is collected. It would be very valuable to analyze NARMS data in relation to those label claims. We therefore request that you make that label data public.

We appreciate your concern about the problem of antibiotic resistance, and urge you to take additional action. We believe our recent testing shows that such action would be effective. The full results of our antibiotic resistance testing are available here (**http://www.consumerreports.org/turkey0613**). Should you have any questions about this data or want to discuss it further please feel free to contact us.

Sincerely,

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