



POLICY & ACTION FROM CONSUMER REPORTS

November 20, 2015

The Honorable Stephen Ostroff, M.D.
Acting Commissioner of Food and Drugs
U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Acting Commissioner Ostroff:

Consumers Union, the public policy and advocacy arm of Consumer Reports, writes regarding the use of antibiotics in agriculture. An overwhelming portion of the antibiotics sold in the U.S. are given to animals raised for food – such as hogs, cattle, chickens, and turkeys. After a Consumer Reports investigation, we would like to express our serious concern with the inappropriate use of antibiotics in the meat and poultry industries.

Consumer Reports this week released “Making the World Safe from Superbugs,” which is featured at ConsumerReports.org/superbugs-in-meat and in the January 2016 issue of *Consumer Reports* magazine. This story examines the progress – and work yet to be done – to stop the antibiotic overuse in meat and poultry production that gives rise to dangerous bacteria. It is the third installment in Consumer Reports’ investigative series on America’s antibiotic crisis, following an overview of the threat from “superbugs” in the August 2015 issue, and an analysis of antibiotic-resistant hospital infections in the September 2015 issue.

Antibiotics are losing their life-saving effectiveness. Their overuse – including in meat and poultry production – has allowed bacteria to evolve so that they are almost impervious to the drugs. According to the most recent data from the Food and Drug Administration (FDA), more than 32 million pounds of antibiotics were sold for use in food animals in the U.S. in 2013 – up 17% from just four years earlier. This increase contributes to the rise of superbugs, which infect at least 2 million and kill approximately 23,000 Americans every year.

The story released this week reflects several elements of our commitment to addressing the antibiotic resistance crisis. It includes a review of a series of in-depth Consumer Reports studies showing that, in general, meat, poultry and shrimp from animals raised without antibiotics are less likely to harbor multidrug-resistant bacteria than conventionally-produced meat from animals that get the drugs routinely. It includes new calculations based on Centers for Disease Control and Prevention data estimating that about 20% of people sickened by an antibiotic-resistant bug do not contract it in the hospital or from another person, but rather from their food. It includes the results of a survey we conducted in September 2015, showing that more than one-quarter of Americans report that they are buying meat and poultry raised without

antibiotics more often than they did a year ago. It includes charts that show which chain restaurants and meat and poultry producers have the best practices with regard to the use of antibiotics and other drugs. And it includes a sidebar piece that shows what various meat and poultry supermarket labels actually mean.

As consumers express increasing concern over antibiotics in meat and poultry, Consumer Reports supports the significant work of FDA to ensure the restrict the use of antibiotics important to human medicine. However, we think there is more that needs to be done to create meaningful change. We therefore make the following recommendations.

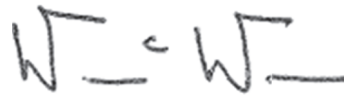
- **Ban all the routine uses of antibiotics important to human medicine.** FDA has issued voluntary guidelines that phase out the use of these drugs for growth promotion but still allow their use for disease prevention with a veterinarian’s approval. That leaves the door open to healthy animals getting antibiotics routinely. At a minimum, FDA should prohibit all uses of medically important antibiotics except for the responsible treatment of sick animals. Ideally, Consumer Reports believes, no drugs should be given to healthy animals routinely.
- **Improve monitoring of antibiotic use.** Right now, because of inadequate and untimely data, it is very difficult to measure how well programs to reduce the use of antibiotics are working – and it is impossible to identify problem areas. FDA, working with the U.S. Department of Agriculture, should collect more detailed data from feed mills and veterinarians on the actual use of antibiotics in food animals – including the particular drug, animal species, and purpose for which the drug was used – and publicly release the data.

Thank you for your consideration of these recommendations. Consumer Reports stands ready to work with you to combat antibiotic-resistant bacteria and provide consumers with the information they need to make healthy and sustainable choices.

Sincerely,



Jean Halloran
Director, Food Policy Initiatives
Consumers Union



William C. Wallace
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