

June 14, 2012

Hon. Louise Slaughter
Member of Congress
2469 Rayburn Building
Washington, DC 20515-3221

Dear Representative Slaughter:

On behalf of Applebee's, I am responding to your February 16, 2012 letter regarding the use of antibiotics in the production of meat and poultry.

Applebee's maintains rigorous purchase specifications with respect to our products. We work closely with our suppliers to ensure animal health products, such as antibiotics, are used in a judicious and appropriate manner, in accordance with protocols set forth by the U.S. Food and Drug Administration (FDA).

For more detailed information, I would refer you to a letter provided to you by the National Restaurant Association.

I hope this information has proven useful to you. Thank you for your interest in Applebee's.

Sincerely,



Gary DuBois
Vice President, Quality Assurance
DineEquity, Inc.

ARTICLE

PRESS RELEASE:

Applegate Responds to Rep. Slaughter's Question on "What's in the Beef" as New Study Finds Origins of MRSA Strain in Food Animals

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Wed Feb 22, 2012 9:00am EST

PRESS RELEASE:

Applegate Responds to Rep. Slaughter's Question on "What's in the Beef" as New Study Finds Origins of MRSA Strain in Food Animals

Urges Other Food Business Leaders to Do the Same

PR Newswire

BRIDGEWATER, N.J., Feb. 22, 2012

BRIDGEWATER, N.J., Feb. 22, 2012 /PRNewswire/ -- Stephen McDonnell, founder and CEO of [Applegate](#), the leading producer of natural and organic meats and cheeses, responded today to a [letter from Rep. Louise Slaughter \(D-NY\)](#) about the company's practices and policies regarding antibiotic use in raising animals for food, just as a [new study](#) released by the Translational Genomics Research Institute (TGen) shows that an antibiotic-resistant strain of Staph may have evolved after jumping from humans to animals and back to humans.

"As a parent and business owner who deals every day with issues surrounding raising animals for food, I applaud Rep. Slaughter's efforts to bring transparency to the issue of antibiotics in our food supply," said McDonnell. "I encourage all the food business leaders who received the letter to respond so that the American people can know more about the food they are eating – especially when it comes to antibiotics," added McDonnell, who in partnership with STOP Foodborne Illness

health.

"The study released by TGen strongly illustrates the connection between antibiotic overuse in food animal production and a public health crisis of antibiotic resistance," said McDonnell. "Rep. Slaughter's work to shed more light on this growing problem couldn't have come at a better time."

In her letter, which was submitted to 60 fast food companies, producers, processors, and grocery chains, Rep. Slaughter asked company executives to disclose policies on antibiotic use and what percentage of meat and poultry sold were raised with or without antibiotics. The Food and Drug Administration reports that 80 percent of the antibiotics sold in the United States are used in

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animal agriculture, and most are given to healthy animals.

"For Applegate, the response to Rep. Slaughter is quite simple: Applegate does not sell any meat or poultry that was produced with antibiotics," said McDonnell. "Applegate works with a network of nearly a thousand family farmers who use common-sense animal husbandry practices like a clean environment, enough space, and a 100% vegetarian diet, and as a result, we've managed to have less than 1 % of our producers' animals fall ill."

The family farmers in Applegate's network rarely have to administer antibiotics to sick animals, but when they do, those animals are removed from our program and sold to conventional producers, according to McDonnell.

"Americans understand that public health is at stake when it comes to antibiotic overuse in animals," said McDonnell, adding that a recent survey conducted by Citizens Against Superbugs found that 75 percent of Americans want government to do something to restrict the use of [antibiotics](#) in animal farms, and 71 percent believe that antibiotic overuse and misuse is causing antibiotic resistance and a human health crisis. "It's time to act so that antibiotics will keep working for all of us – animals and humans."

Consumers can learn more about the survey and take part in the conversation at www.facebook.com/CitizensAgainstSuperbugs and Twitter with [#StopSuperbugs](#).

About the Survey

The survey was administered online by Toluna, one the world's leading online panel and survey technology providers, with a total sample of 2,211 men and women aged 18 years or older. From this overall sample, 573 parents with children under 18 living at home, who are registered voters, and are primary grocery shoppers were identified and screened. Research was conducted in December 2011. The survey was sponsored by Applegate.

About Applegate

For more than 20 years, Applegate has been producing high-quality natural and organic hot dogs, bacon, sausages, deli meats, cheese and frozen products. Natural can mean many things, but when Applegate says their products are natural, consumers are guaranteed that the meat inside is:

- o Raised without antibiotics or hormones
- o From animals fed a vegetarian or 100% grass diet and treated with humane animal standards
- o Free of added chemical nitrites, nitrates or phosphates
- o Free of artificial ingredients or preservatives

For more information about our products, visit <http://www.applegate.com/>.

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Stephen McDonnell

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By Steven Brill

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June 14, 2012

The Honorable Louise M. Slaughter
U.S. House of Representatives
28th District, New York
2469 Rayburn House Office Building
Washington, D.C. 20515-3221

VIA: Federal Express and Facsimile (202-225-7822)

Dear Representative Slaughter:

Arby's Restaurant Group, Inc. (ARG) is in receipt of your letter dated February 16, 2012 requesting information about the extent to which ARG sources its meat and poultry products from companies that routinely use antibiotics in the raising of livestock and poultry. While ARG does not possess the detailed information you have requested regarding the specific production practices of our suppliers, please be assured that maintaining the highest standards of food safety and quality is of paramount importance to ARG and its franchisees. ARG and its franchisees are committed to serving Arby's® customers safe, wholesome products that meet applicable industry and regulatory standards.

ARG and its suppliers are aware of the active debate surrounding the use of antibiotics in the raising of livestock and poultry. ARG's purchase specifications require that suppliers to the Arby's System be in compliance with all applicable laws and regulations, including those administered by the Food and Drug Administration (FDA), the United States Department of Agriculture (USDA) and Food Safety and Inspection Service (FSIS).

Specifically, ARG's suppliers have assured us of their support for the stringent FDA approval process for veterinary drugs, the addition of significant FDA risk assessment requirements several years ago, the long-standing federal residue monitoring program of all meat and poultry products, and the overall humane treatment of animals including the appropriate use of antibiotics.

ARG will continue to work with its suppliers and others in the industry on this important topic. Thank you for your interest in Arby's and our commitment to serve safe, high quality food to our customers.

Sincerely,



Darrell Kinkaid
Vice President
Chief Food Safety Officer
Arby's Restaurant Group, Inc.



Charles Papa, Ph.D.
Food Safety & Regulatory Affairs
Compliance Officer
Arby's Restaurant Group, Inc.





June 14, 2012

The Honorable Louise M. Slaughter
2469 Rayburn Building
Washington, D.C. 20515-3221

Dear Representative Slaughter:

Au Bon Pain appreciates that consumers are concerned about food safety and are becoming more aware of and concerned about the effect of antibiotic use by the suppliers of various foods. Au Bon Pain has responded by seeking to reduce its purchasing of products raised with routine usage of antibiotics, and now offers its guests poultry and beef products that are produced without the routine use of antibiotics.

Au Bon Pain is a relatively small, regional brand, and does not possess the market power to alter the way suppliers do business. Nevertheless, we intend to raise the awareness of the concerns your letter identifies with our suppliers.

We commend your efforts and are available to answer any further questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Wade Winters". To the right of the signature, there are initials "WB" written in a similar cursive style.

Wade Winters

Vice President of Purchasing

Bell & Evans®

April 19, 2012

Congresswoman Louise M. Slaughter
Ranking Member, Committee on Rules
2469 Rayburn Building
Washington, DC 20515-3221

Dear Congresswoman Slaughter,

Thank you for spearheading this investigation into the misuse of antibiotics by meat and other poultry producers. We share your concern for this public health problem. At Bell & Evans, we hold ourselves to a much higher standard than any other poultry company. For over a decade we have raised our chickens in clean and healthy environments, so we have no need to pump them full of antibiotics.

Every barn is thoroughly cleaned out and disinfected between each flock. There is no composting of old manure in our barns. Baby chicks are placed on new litter, which keeps dust and ammonia levels to a minimum. Our barns have cement floors so rodents can't tunnel in, bringing with them E. Coli, Salmonella and Campylobacter. Their feed is also kept safe from rodents, their feces and other foreign objects. All equipment used to transport the chickens to the processing plant is cleaned and sanitized between loads. All flocks are traceable from hatchery through processing.

In answer to your specific questions:

- 1.) All Bell & Evans branded chickens are raised without antibiotics throughout their entire life cycle. We use no antibiotics in their feed, their water, nor do we inject antibiotics into their eggs...ever. This has been our policy since 1998.

We supply our growers with the all feed for Bell & Evans branded chickens, so we have complete control over what they do and do not ingest. We computer monitor every batch of feed at Bell & Evans' three feed mills, to guarantee our scientifically-designed feed contains: no antibiotics, no animal by-products, no bakery goods, no hexane-separated soybean meal, no DDGS (distiller's dry grains with solubles - also known as ethanol by-products), no arsenic, no sulfa drugs and no imported Chinese ingredients. We follow up by testing randomly collected feed samples from each of our suppliers, to ensure there are no antibiotics present. Each batch is checked against the Bell & Evans standard for quality control.

- 2.) Bell & Evans uses every opportunity to educate the consumer about our raised without antibiotics policies. 'Raised without Antibiotics' appears on all packaging. We go into great detail in consumer handouts and on our social networking sites, such as the Bell & Evans website, blog, Facebook page and Twitter. We provide retailers with point of sale brochures, posters and video.
- 3.) 100% of all Bell & Evans branded chickens are raised without antibiotics throughout their entire life cycle.
- 4.) 0% of Bell & Evans branded chickens are administered antibiotics for 'disease treatment'.



PO BOX 39 • FREDERICKSBURG, PA 17026
717-865-6626 • FAX: 717-865-7046 • bellandevans.com



- 5.) 0% of Bell & Evans branded chickens are administered antibiotics for 'treatment and control of disease'.
- 6.) 0% of Bell & Evans branded chickens are administered antibiotics for 'routine use'.
- 7.) For over a decade, Bell & Evans has enforced a 'no antibiotics ever' policy. We have no intention of changing those policies now.

We absolutely agree antibiotics in agriculture poses a significant health crisis to the American public, but it's not just from processors administering antibiotics. With the cost of corn rising, feed producers have started to replace corn-based livestock and poultry feed with DDGS (distiller's dry grains with solubles).

DDGS are a by-product of the fermentation process used to create ethanol from various crops, such as corn. Ethanol, the product of starches broken down by enzymes into sugars, is fermented and distilled in a warm and moist environment. Unfortunately, this environment is perfect for the growth of bacteria. Estimates are that slightly over half of all U.S. ethanol plants currently use antibiotics to control bacterial contamination. There is concern that not all antibiotics are metabolized during ethanol production and remain in the DDGS protein as residue. This antibiotic residue becomes part of meat and poultry feed. So even if processors are not actively administering antibiotics, their livestock could be ingesting antibiotics from the DDGS. Bell & Evans feed contains no DDGS.

Bell & Evans believes it's what we do and do not feed our chickens that's important. We create our soy meal by extruding and expeller-pressing the soy beans. Our special process is environmentally friendly and produces a soybean meal that's richer in nutrients such as lecithin, linoleic acid and vitamin E. We keep all of the vitamins and some of the oil in the meal. The hexane solvent extraction process, commonly used in the United States, separates the oil and vitamins from the soy beans. As part of this least-expensive process, hexane gas is released into the air. The EPA categorizes hexane as a hazardous air pollutant and residuals from the hexane potentially remain in the meat.

We have additional concerns about Arsenic in feed. Most arsenic-containing animal feed additives are commonly used in poultry production to control intestinal disease, induce faster weight gain and give the meat a healthy-looking color. The International Agency for Research on Cancer (IARC) has determined that inorganic arsenic is carcinogenic to humans. The FDA found that chickens fed roxarsone had small amounts of inorganic arsenic in their livers. Arsenic, that does not stay in the poultry, leaches into the surrounding soil, water and crops through their manure. At Bell & Evans, we add no arsenic-containing compounds to our feed.

Thank you for this opportunity to outline Bell & Evans' position on the use of antibiotics and other food additives in livestock feed. We stand behind the integrity of our product, people and processes that ensure every Bell & Evans chicken is the safest, most wholesome chicken our customers can buy. Should you have any additional questions about our policies concerning food safety and product quality, please contact me.

Sincerely,

Thomas Stone
Director of Marketing
enc:3



Telephone: (305) 378-7427
Facsimile: (305) 378-7367
E-mail: dbeamonte@whopper.com

June 11, 2012

To the Honorable Louise M. Slaughter
Congress of the United States
2469 Rayburn Building
Washington, DC 20515-3221

RE: **ANTIBIOTICS**

Dear Congresswoman Slaughter:

We are in receipt of your letter dated February 16, 2012 regarding antibiotics. We have carefully reviewed the letter and have responses to your questions below. It is important to understand at the outset that Burger King Corporation ("BKC") is a franchisor of over 6,000 *Burger King*® restaurants in the U.S. and we directly operate a little over 400 *Burger King* restaurants. We do not own or have a financial interest in the supply chain of products to our franchised restaurants. We do not own cattle, hog or chicken farms nor do we own an interest in any such businesses. Our responsibility as franchisor is to set the specifications for the products that need to be served in *Burger King* Restaurants and then find, approve and audit the manufacturers and suppliers who make the products and sell them directly to the franchisee operators and company operators of *Burger King* restaurants. We, ourselves, are not producers of any raw materials or ingredients.

Your questions are in italics below:

1. Please describe your current policies on purchasing meat and poultry produced with antibiotics and how compliance with these policies is assured.

Answer: At BKC, we have several principles that guide our animal treatment practices for our suppliers. We encourage good animal husbandry by adopting meaningful requirements to make certain that our vendors and suppliers treat animals properly. Our vendors and suppliers may use antibiotics only under the supervision of a licensed veterinarian and only in full compliance with all applicable regulatory requirements. Our suppliers may not use antibiotics for growth-promotion purposes such as feed efficiency or weight gain. Producers must ensure that all unused antibiotics are disposed of properly. Finally, in accordance with BKC policy, all beef, pork and chicken used in *Burger King*® products is purchased by processors that either produce or harvest live animals or they purchase from Federally inspected slaughter facilities. All

products must be in full compliance with all Federal Regulations including regulations for residue compliance. Compliance to the policies is ensured through routine internal audits and third party audits of the suppliers.

2. Please describe how or if you educate consumers about your meat and poultry purchasing policies regarding antibiotic use in production.

Answer: We publish our antibiotic policy on our Corporate Responsibility Report, which is posted in our website at bk.com.

3. Please provide the percentages of beef, pork, and poultry that your company purchases that are produced without antibiotics. Please provide a figure for each category of meat. "Without any antibiotics" means that antibiotics have not been used for any reason in the animal's life, or, in the case of poultry, injection of the egg with antibiotics before hatching.

Answer: BKC does not have figures for beef and pork because they are purchased as commodities and beef and pork that is produced without antibiotics is not segregated. Some chicken is treated for illness or disease but never fed antibiotics for growth-promotion or feed efficiency. Eggs are vaccinated to prevent New Castle Disease. The vaccine contains a very small amount of antibiotic to prevent the vaccine from becoming infected.

4. Please provide the percentages of beef, pork, and poultry that your company purchases that are produced in a manner that includes antibiotics only for disease treatment. Please provide a figure for each category of meat. "Disease treatment" means treatment of sick animals. It does not include antibiotics used for growth promotion, feed efficiency, disease prevention, or disease control.

Answer: Those numbers are not available for beef and pork due to the fact that the animals come from thousands of farms and individual animals are moved from farm to farm and their individual treatment records may not be transferred at the time of sale. We allow our suppliers to use antibiotics for disease treatment, disease control and disease prevention but not for growth promotion.

5. Please provide the percentages of beef, pork, and poultry that your company purchases that are produced in a manner that includes antibiotics only for treatment and control of disease. Please provide a figure for each category of meat. "Treatment and control of disease" means treatment of sick animals and treatment of animals that have been exposed to documented disease. It does not include antibiotics used for growth promotion, feed efficiency, disease prevention, or, in the case of poultry, injection of the egg with antibiotics before hatching.

Answer: For chicken that would be 100%. The numbers for beef and pork are not known for the same reasons mention in the previous answer.

6. Please provide the percentages of beef, pork, and poultry that your company purchases that are produced in a manner that includes the routine use of antibiotics. Please provide a figure for each category of meat. "Routine use of antibiotics" means any use of an antibiotic in the absence of disease. This includes use for growth promotion, feed efficiency, and disease prevention.

Answer: That number for beef and pork is also not known because the number of farms and movement of the animals. None of the chicken sold in the system is raised with the "Routine use of antibiotics".

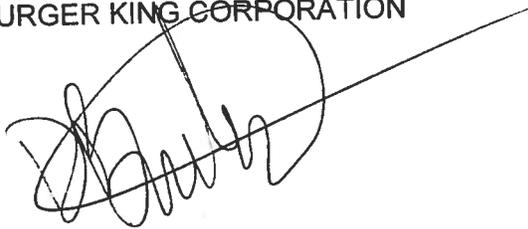
7. Please inform us as to any planned changes in policy regarding the use of antibiotics to produce meat purchased by your company due to human health or consumer demand.

Answer: We are satisfied with the implementation our antibiotics policy on poultry and we expect that the new FDA policies to phase out sub-therapeutic use and phase-in veterinary oversight for all medically important antibiotics will help minimize any improper use of antibiotics on the more fragmented pork and beef industries.

I hope our answers were helpful for your purposes. If you have any follow-up questions, please do not hesitate to contact me directly.

Very truly yours,

BURGER KING CORPORATION

A handwritten signature in black ink, appearing to read 'Diego Beamonte', is written over a horizontal line. The signature is stylized and somewhat cursive.

Diego Beamonte
Vice President, Global Quality

Cc: Jill Granat



June 15, 2012

Hon. Louise Slaughter
Member of Congress
2469 Rayburn Building
Washington, DC 20515-3221

Dear Representative Slaughter:

On behalf of Cargill, Incorporated I am responding to your letter dated February 16, 2012, relating to the use of antibiotics in the production of meat and poultry. Although we do not possess much of the information you have requested, and because some of the questions involve proprietary sales information, we are sharing with you our overall approach to our animal care policies, including antibiotic use.

As a global leader in providing products and services for the growth and care of animals, Cargill is committed to using innovation to improve animal health and welfare that can help reduce the need for antibiotics. Cargill favors regulatory policy that is science and risk based and supports the stringent Food and Drug Administration (FDA) approval process for veterinary drugs. We support the Department of Agriculture's federal residue monitoring program for all meat and poultry. We believe it demonstrates solid cooperation among animal health and nutrition companies, producers, and regulatory agencies to help ensure that pharmaceutical products are used appropriately.

It is our view that farmers and ranchers today work diligently to manage their livestock through a combination of sound husbandry practices, including genetics, nutrition, housing, handling, as well as veterinary care so that the use of antibiotics may be minimized. We believe that the judicious use of antibiotics is not only good for farmers and ranchers, it is good for the rest of the food production chain and for consumers.

Like others in the industry, Cargill maintains rigorous livestock purchasing specifications. We work with customers and suppliers to ensure the judicious use of government-approved antibiotics that support public health and protect animal health and welfare. Producers must observe government mandated appropriate withdrawal times and we reserve the right to "de-list" any supplier who fails to meet this expectation. We counsel our suppliers to join programs such as the National Pork Board's Pork Quality Assurance Plus and the National Cattlemen's Beef Association Beef Quality Assurance program to provide principles and guidelines for judicious antibiotic use.

FDA regulations provide that labels of approved animal medicines have very clear "withdrawal time" requirements. Cargill similarly has a clear policy that when antibiotics are administered, our suppliers have protocols in place to ensure that the animals are not introduced into the food

Mailing:
Cargill, Inc.
Corporate Food Safety &
Regulatory Affairs
P.O. Box 9300 MS #65
Minneapolis, MN
55440-9300 USA

Shipping:
Cargill, Inc.
Corporate Food Safety &
Regulatory Affairs
15615 McGinty Road W #65
Wayzata, MN 55391 USA

*Tel: 952-742-0145
Fax: 952-742-5216*

supply until the medicines have sufficiently cleared the animals' systems. To that end, we recommend that our suppliers work closely with a licensed veterinarian.

Cargill believes that animal health is best protected when producers work with licensed veterinarians to determine the appropriate use of animal medicines. We believe that producers should adhere to those labeled uses of animal medicines to best protect animal health, welfare and food safety. Extra-label drug use should only be warranted in the event that medicines are needed to alleviate disease and prevent suffering, as provided under the Animal Medicinal Drug Use Clarification Act 21 CFR Part 530.

In addition, we are following with great interest the changes being recommended by FDA, which recently published additional guidance documents detailing its intent to phase out non-therapeutic use and phase-in veterinary oversight for all medically important antibiotics. We remain committed to using science and innovation to protect human and animal health and welfare and support the ongoing multi stakeholder dialogue on responsible antibiotic use.

I hope this information has proven useful to you. If you have any questions about the information provided above, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Robach", written in a cursive style.

Mike Robach
Vice President,
Food Safety and Regulatory Affairs



Chick-fil-A, Inc.
5200 Buffington Road
Atlanta, Georgia 30349-2998
www.chick-fil-a.com

June 12, 2012

The Honorable Louise Slaughter
Congress of the United States
28th District, New York
2469 Rayburn Building
Washington, DC 20515-3221

Dear Representative Slaughter:

Thank you for your letter regarding the use of antibiotics in the production of poultry. We want to assure you that Chick-fil-A, Inc. takes this issue very seriously.

As an initial response, Chick-fil-A is in agreement with the letter dated June 11, 2012 sent to you by the National Restaurant Association. That letter reflects the current views of the restaurant industry on the antibiotics issue.

Secondarily, since the date of your letter, we are pleased to see that the FDA has announced a strategy to protect public health and to promote the judicious use of medically important antibiotics in food producing animals. Chick-fil-A supports the FDA's efforts in this area.

Additionally, you should know that Chick-fil-A maintains rigorous specifications with respect to the poultry breast meat that is served throughout our restaurant system. We partner with some of the best suppliers in the United States and require them to comply with all applicable laws and regulations related to animal welfare and food safety.

Chick-fil-A's specifications require our suppliers to utilize technologies and products, including the use of animal health products such as antibiotics, in a responsible and appropriate manner. It is Chick-fil-A's expectation that all of its poultry suppliers only use antibiotics with good stewardship (prudent use) to ensure bird and flock health. Chick-fil-A's specifications for breast meat production do not permit the use of antibiotics for growth promotion (sub-therapeutic) or to improve feed efficiency (as this is not prudent use).

We also specify that suppliers do not use antibiotics in place of effective on-farm and processing controls (Good Agricultural Practices, Best Management Practices, Good Manufacturing Practices and HACCP). We are currently working with our suppliers to explore additional methods that might further reduce exposure to antibiotics in agribusiness.

Page 2
Hon. Louise Slaughter
June 12, 2012



Finally, in addition to Chick-fil-A's specifications, we rely heavily on our supplier's internal programs, regulatory oversight and certified independent third-party verification and audits for animal welfare and food safety.

For a specific infection, the FDA requires that only FDA approved antibiotics should be administered by a supplier's licensed veterinarian. In addition, antibiotics needed for treatment of disease and/or to control disease in a flock should only be administered according to instructions on the label (dose, route, target, and withdrawal period).

As stated above, we are following with great interest the changes being implemented by the FDA in this area. We believe these changes will lead to a better understanding of the important role antibiotics play in protecting public health.

I hope this information has proven useful to you. If you have any questions about the information provided above, please feel free to contact me.

Respectfully submitted,

A handwritten signature in black ink that reads "Thomas E. Childers".

Thomas E. Childers
Sr. Director, Menu Innovation & Quality



CHIPOTLE MEXICAN GRILL, INC.
1401 WYNKOOP STREET, SUITE 500
DENVER, CO 80202

MAIN 303.595.4000
WEB chipotle.com

Rep. Louise M. Slaughter
3120 Federal Building
100 State Street
Rochester, NY 14614

March 26, 2012

Dear Rep. Slaughter,

As you know, Chipotle has been a leader in changing the way people think about and eat fast food for nearly twenty years. Through our quest for better ingredients from more sustainable sources, we have achieved a number of milestones, including being the first national restaurant company to serve 100 percent naturally raised meat, all of which comes from animals that are raised in a humane way and never given antibiotics or added hormones. As you know from our meetings, we believe so deeply in this cause that we have been a long-time advocate for responsibly raised food, and a supporter of like-minded farms and ranches.

Your letter raises important concerns about the ever-increasing quantities of antibiotics that are administered to livestock in America, and Chipotle is proud to have relationships with partners who have similarly eschewed this practice, and hope other restaurant companies will follow our lead.

By way of providing answers to your specific questions, I am pleased to report that:

1. All of the meat we serve in our restaurants is naturally raised, coming from animals that are never given antibiotics or added hormones, and raised in a humane way. Today, we are the only national restaurant company to serve all naturally raised meat. While we have very little slack within our supply chain and do, on occasion, incur unpredictable and short-term supply disruptions, we are continuing efforts to build upon our network of existing suppliers to identify additional supply to protect us from periodic disruptions to our system.
2. Over the last few years, our commitment to serving food from more sustainable sources is the cornerstone of our marketing programs, and that message is central to our advertising, public relations, in-store communications, and online. There is increasing information regarding our standards and accomplishments available on our website (chipotle.com), our YouTube page (YouTube.com/Chipotle), through our Farm Team loyalty program, and in scores of news stories we have participated in over the years. By way of example, our animated short film, "Back to the Start," shows one farmer's journey from more sustainable farming to a more industrial one and then back again. Through its run on nearly 10,000 movie screens, a commercial spot during this year's GRAMMY Awards, and millions of YouTube views, the film has been seen more than 60 million times and counting, and has been named one of the top ads of 2011.
3. Today, 100 percent of our meat comes from animals raised without the use of antibiotics except when we incur unforeseen short-term, periodic supply disruptions.
4. None of the meat we purchase is produced in a manner that includes antibiotics for disease treatment. Under Chipotle's protocols, animals can be given antibiotics for the treatment of illness, but must then be removed from our program.

5. None of the meat we purchase is produced in a manner that includes antibiotics only for the treatment and control of disease. As described above, animals can be given antibiotics for the treatment of illness, but must then be removed from our program.
6. With the exception of periodic, short-term supply disruptions that we cannot forecast or control, none of the meat we purchase is produced in a manner that includes the routine use of antibiotics.
7. We do not have any planned changes in policy regarding the use of antibiotics to produce our meat. Our protocols already preclude the use of antibiotics, and we remain committed to pushing ourselves to find better, more sustainable sources for all of the food we serve.

I am very pleased with the progress and leadership Chipotle has shown in these areas, and proud to help you in your work as this issue moves forward. While there are influential voices opposing this issue on the grounds that better food cannot be produced in a way that is widely available and reasonably priced, Chipotle is showing that great food, from more sustainable sources, can be served in a way that is affordable and accessible to everyone.

If you have any questions or need any additional information, please contact Chris Arnold in our office at 303.222.5912, or by e-mail at carnold@chipotle.com. Otherwise, I will look forward to working with you further as this issue moves forward.

Best regards,



Steve Eills
Founder, Chairman & Co-CEO



June 13, 2012

The Honorable Louise M. Slaughter
Member of Congress
2469 Rayburn Building
Washington, DC 20515-3221

Dear Representative Slaughter:

CKE Restaurants, Inc. (CKE) has received your letter dated February 16, 2012 inquiring about the use of antibiotics in the production of meat and poultry.

CKE is committed to serving safe, quality food to every guest. Our Company uses quality products that meet or exceed the requirements established by appropriate government agencies. All meat products are purchased from USDA approved facilities and must conform to USDA requirements. Our Corporate website includes more detailed information on our quality assurance protocols which are readily available to the public at http://www.ckr.com/about_quality.html.

We purchase our meat products from many reputable suppliers who enforce the responsible use of antibiotics solely as a health-management tool. All processing facilities are required to comply with rigid antibiotic residue testing programs administered by the FDA and USDA.

CKE is committed to following the science-based FDA Regulations and Guidelines for the safety of our customers.

Sincerely,

A handwritten signature in blue ink that reads "Ron Wennerberg".

Ron Wennerberg
Vice President Quality Assurance



June 12, 2012

The Honorable Louise M. Slaughter
c/o Dr. Carolyn Shore, PhD
US House of Representatives
2469 Rayburn House
Washington, DC 20515-3228

Dear Congresswoman Slaughter,

On behalf of Compass Group USA and all our companies and divisions, including Restaurant Associates and Bon Appétit Management Company, we are happy to share our policies regarding the use of antibiotics in animal protein. We appreciate the role we play in the nation's food supply and treat it as both a responsibility and an opportunity. This letter, including the attached spreadsheet, serves to provide you with the information you requested.

Compass Group has policy guidelines regarding the use of non-therapeutic antibiotics in animal production. Since 2006 we have disapproved the purchasing of poultry in which antibiotics that belong to classes of compounds approved for use in human medicine have been used non-therapeutically or for growth promotion. Our contracted suppliers are expected to ensure that the use of antibiotics in food animals is being addressed in compliance with applicable laws and regulations. Further, they are expected to provide products which adhere to specific criteria developed in partnership with the Environmental Defense Fund. Suppliers must be able to meet our policy or present a plan on how they will work with us to achieve our goals in the future.

Compass Group also has guidelines, developed in partnership with the Environmental Defense Fund and a pork supplier, regarding the use of non-therapeutic antibiotics in pork production and we understand that the pork supplier has been gradually reducing the level of non-therapeutic antibiotics in its U.S. pork production since the beginning of our partnership.

Bon Appétit has enhanced standards and compliance requirements, in addition to those described above, that include serving hamburgers made from fresh ground beef from cattle raised on vegetarian feed without the use of antibiotics or hormones. Bon Appétit's preference is to use antibiotic free meat sources whenever the product is available. In February 2012, Bon Appétit initiated a commitment to source 100% of its pork from gestation crate-free sources and 25% of all its meat from Certified Humane sources, which prohibit use of antibiotics for any reason other than treating diseases observed in animals. Additionally, Bon Appétit purchases 20% of its meats from "Farm to Fork" sources (small producers located within 150 miles of its kitchens in 32 states) which use no non-therapeutic antibiotics at all (a Farm to Fork program requirement). These purchases are not reflected in the totals on the attached spreadsheet, because they are reported through a separate database and represent a small percentage of the Compass overall total.

Compass Group North America
2400 Yorkmont Road, Charlotte, NC 28217
www.compass-usa.com
704.329.4000

Additional information about Compass Group policies regarding the use of non-therapeutic antibiotics in animal protein are available on our corporate website, www.compass-usa.com; the website of our procurement company, Foodbuy: www.foodbuy.com; and at company sector-specific websites, including: www.bamco.com; www.flik-usa.com; www.restaurantassociates.com; www.chartwellsschools.com; www.chartwellshighereducation.com; www.flikindependentschools.com; www.wolfganagpuck.com; and www.iammorrison.com. In addition, many Compass Group accounts feature signage in the cafes that communicate the company's policies with our guests.

Attached is the Excel spreadsheet with the information you have requested. Please let me know if we can be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Cheryl Queen".

Cheryl Queen
Vice President Corporate Communication
Compass Group USA



Congressional request for use of Antibiotics

Objective: Congresswoman Louise M. Slaughter - 29th District NY would like to know the choices our company makes regarding meat and poultry purchases with regard to the use of Antibiotics in beef, pork, and poultry.

Date to submit data to Carolyn Shore (carolyn.shore@mail.house.gov): June 15th, 2012

Questions

1. Please describe your current policies on purchasing meat and poultry produced with antibiotics, and how compliance with these policies is assured.
2. Please describe how or if you educate consumers about your meat and poultry purchasing policies regarding antibiotic use in production.

| | Percentages | | | |
|--|-------------|------|---------|--------|
| | Beef | Pork | Chicken | Turkey |
| 3. Please provide the percentages of beef, pork, and poultry that your company purchasing that are produced without any antibiotics . Please provide a figure for each category of meat. "Without any antibiotics" means that antibiotics have not been used for any reason in the animal's life, or, in the case of poultry, injection of the egg with antibiotics before hatching. | 1% | | | |
| 4. Please Provide the percentages of beef, pork, and poultry that your company purchases that are produced in a manner that includes antibiotics only for disease treatment . Please provide a figure for each category of meat. "Disease Treatment" means treatment of sick animals. It does not include antibiotics used for growth promotion, feed efficiency, disease prevention, or disease control. | 6% | 25% | | 75% |
| 5. Please provide percentages of beef, pork, and poultry that your company purchases that are produced in a manner that includes antibiotics only for treatment and control of disease . Please provide a figure for each category of meat. "Treatment and control of disease" means treatment of sick animals and treatment of animals that have been exposed to documented disease. It does not include antibiotics used for growth promotion, feed efficiency, disease prevention, or disease control. | 12% | 50% | 51% | 20% |
| 6. Please provide the percentage of Beef, pork, and poultry that your company purchases that are produced in a manner that includes the routine use of Antibiotics. Please provide a figure for each category of meat. "Routine use of antibiotics" means any use of an antibiotic in the absence of disease. this includes use for growth promotion, feed efficiency, and disease prevention. | 81% | 25% | 49% | 5% |
| 7. Please inform the Congresswoman as to any planned changes in policy regarding the use of antibiotics to produce meat purchased by our company due to human health concerns or consumer demand | | | | |

Submitted by:

Compass Group USA Inc.

Answers:

JUN 25 2012

Phillip L. Minerich, Ph.D.

Vice President

Research & Development

June 15, 2012

Hormel Foods Corporate Services, LLC

Research & Development

2 Hormel Place

Austin MN 55912-4935

Phone 507 434 6372

Fax 507 437 5117

E-Mail: plminerich@hormel.com

Hon. Louise Slaughter
Member of Congress
2469 Rayburn Building
Washington, DC 20515-3221

Dear Representative Slaughter:

Hormel Foods received your letter dated February 16, 2012, inquiring about the use of antibiotics and the production of meat and poultry. Although we do not possess much of the information you requested, I can provide you with the following.

Food safety is our highest priority at Hormel Foods and scientific research shows that healthy hogs and turkeys help ensure a safe food supply. The well-being of our consumers and our animals are top priorities at Hormel Foods.

All animal medications are evaluated and regulated by the U.S. Food and Drug Administration (FDA) and licensed veterinarians prescribe only approved medications and dosage levels to properly treat, control and prevent illness in animals. The FDA has the authority to ban any animal drug it feels poses a risk to human health.

Hormel Foods and the producers that supply hogs and turkeys to the company follow programs that meet or exceed FDA guidelines to ensure medications are used appropriately to keep animals healthy.

Hormel Foods requires all of our hog producers to sign the company's "Quality Assurance Program Producer Certification" document. This document certifies that all hog producers that supply hogs to Hormel Foods and employees of these producers who work with hogs are certified in Pork Quality Assurance (PQA) Plus. PQA Plus focuses on 10 good production practices (GPP), including a chapter about proper antibiotic use. At company-owned hog and turkey operations, we have six veterinarians who are responsible for overseeing the direction and management of all livestock health assurance programs. In addition, in our turkey operations, we also have two flock health specialists with veterinary science degrees. At our hog operations, the veterinarians are responsible for ensuring compliance with the guidelines provided by "Take Care. Use Antibiotics Responsibly" and that all employees who work with animals are PQA Plus certified.

In addition to the work we have done with our producers, we have increased monitoring for antibiotic residues at our production facilities. In addition to the random statistical sampling testing performed by the U.S. Department of Agriculture (USDA), we have begun our own testing program using the Charm KIS rapid test (which is also the same test used by USDA personnel). Since 2008, we have conducted random residue testing on more than 6,700 hogs. These test results confirm our producers are using antibiotics responsibly and are following the GPPs identified in the PQA Plus program.

With these steps outlined above, we are able to assure our customers the pork and turkey products produced from these animals meet the highest standards for food safety and quality.

In short, optimal animal health and welfare is not only good for farmers, it is good for the rest of the food production chain, and it is essential to helping ensure a safe and abundant food supply that is affordable to all consumers, including those trying to feed their families on a limited income.

Our medication use is described in our 2011 corporate responsibility report at www.hormelfoods.com/csr and can be viewed by our consumers if they wish to know more about this topic.

A recent initiative taken by FDA that we feel will be welcomed by customers is the release of Guidance 209 and 213. The voluntary policies recommend phasing out of sub-therapeutic use and the phase-in of veterinary oversight for all medically important antibiotics. We are confident these types of changes can lead to better understanding of the critical role antibiotics play in keeping food producing animals healthy and give consumers further confidence in our regulatory oversight.

Please let me know if you may have any further questions.

Respectfully submitted,



Phillip L. Minerich
Vice President Research & Development

plm:jas(106838)

13502 Hamburger Lane
Baldwin Park, California 91706-5885
(626) 813-8200



The Best Enterprise
Is A Free Enterprise®

Honorable Louise Slaughter
Member of Congress
2469 Rayburn Building
Washington D.C. 20515-3221

June 15, 2012

Dear Representative Slaughter,

Our company received your February 16, 2012 inquiry regarding antimicrobial use in livestock production. Understanding that antimicrobial resistance is complex topic, we support public policy whose foundation is one of sound scientific principle. Accordingly, the Food and Drug Administration (FDA) and Department of Agriculture (USDA) regulatory requirements in concert with applicable law and industry best practices serve to guide our decision making. In an effort to balance animal welfare with human health objectives, we note the following as examples of policy, best practices and research initiatives that our company supports, and where applicable, require of our suppliers.

Food and Drug Administration:

- ✓ Antimicrobials used in veterinary medicine are reviewed and approved by FDA pursuant to the Federal Food, Drug, and Cosmetic Act (FDCA) and that approval process includes a risk-benefit assessment, a food safety assessment, an antimicrobial resistance assessment and prudent use labeling;
- ✓ The continuation of interagency task forces on antimicrobial resistance, e.g. the 2011 document entitled, "A Public Health Action Plan to Combat Antimicrobial Resistance" and
- ✓ FDA guidance number 209 which states that using medically important antibiotics in food producing animals for growth promotion purposes is injudicious and that the remaining therapeutic uses should be carried out under the guidance of a licensed veterinarian.

Department of Agriculture:

- ✓ The 2012 Compliance Guide for Residue Prevention;
- ✓ Continuing the National Antimicrobial Resistance Monitoring Systems as a tool to manage antimicrobial resistance pathways in animals and humans;
- ✓ Increasing routine residue monitoring of meat from 90 to as many as 150 compounds;
- ✓ FSIS Notice 41-12, published June 7, 2012, "How to proceed in establishments that have multiple FSIS laboratory confirmed residue violations from the same source supplier;"
- ✓ The development and availability of a residue violator list to better enable suppliers to avoid buying livestock from questionable sources;
- ✓ Ante-mortem inspection by public health veterinarians; and

"God Bless America" • The Customer Is Everything To Us

- ✓ Residue testing of livestock exhibiting potential clinical signs, and, random selection and testing of those not exhibiting clinical signs.

Industry best practices and related research:

- ✓ The National Cattlemen's Beef Association Beef Quality Assurance program;
- ✓ The American Veterinary Medical Association's comprehensive guidelines on the judicious therapeutic use of antimicrobials;
- ✓ Continuing antimicrobial risk assessments to help better quantify potential human health impacts;
- ✓ The judicious use of antimicrobials by the livestock production community in an effort to provide for animal health and animal welfare assurances;
- ✓ The development and advancement of controls that mitigate potential antimicrobial resistance; and
- ✓ Educational tools that convey sound animal husbandry practices to farmers and ranchers.

This information is evidence of the multiple initiatives across the food chain that are underway and required to address the complexities of antimicrobial resistance. As the food industry continues to research pathways as to how best to control antimicrobial resistant bacteria, one thing is clear: any regulatory policy or decisions must be science based. We are encouraged that the FDA, USDA and industry continue to work together across the farm to fork continuum to employ additional risk mitigation strategies through scientific discovery.

If you have any questions about any of the information provided above or anything else regarding this issue, please contact me.

Respectfully,



Mark Kreul, Ph.D.
Manager, Food Safety

June 14, 2012

The Honorable Louise M. Slaughter
Congress of the United States
House of Representatives
28th District, New York
2469 Rayburn Building
Washington, DC 20515

Dear Representative Slaughter:

This letter is in response to your February 16, 2012, inquiry concerning antibiotic use in the production of meat and poultry products used at Jack in the Box, a chain of approximately 2,200 fast-food restaurants in the U.S. We share your concern regarding the appropriate use of antibiotics in the raising of farm animals and poultry. After you sent your letter, the FDA published three documents in the Federal Register aimed at protecting the health of consumers by promoting the judicious use of medically important antibiotics in food-producing animals and poultry, including:

- Guidance #209, which outlines the FDA's strategy to phase out production uses of antimicrobials of importance in treating humans and to phase in veterinary oversight for the therapeutic use of these drugs over an estimated three-year timeframe;
- Guidance #213, which allows drug companies to voluntarily remove animal production uses from their FDA-approved product labels and requires veterinary oversight for drug administration; and
- A proposed Veterinary Feed Directions (VFD) regulation that allows veterinarians to use certain antimicrobials in animal feeds.

Jack in the Box applauds these efforts by the FDA to restrict antibiotic use in animals to the treatment of disease and health problems while increasing the role of veterinary oversight and eliminating over-the-counter drug use.

In your letter, you asked for additional information pertaining to the meat and poultry that we source from our producers. Our response follows:

1. Please describe your current policies on purchasing meat and poultry produced with antibiotics and how compliance with these policies is assured.

Jack in the Box does not raise or process animals. We work directly with meat and poultry producers who source raw materials either from their own facilities or from other suppliers, so we are generally at least two steps removed from farm operations. Our purchasing contracts with all meat and poultry producers require them and their suppliers to meet all applicable federal, state and local laws and regulations. We rely upon



established government regulations to ensure that our producers are utilizing technologies and products, such as antibiotics, in a judicious and appropriate manner. As an example, our industry relies on USDA residue monitoring programs to detect violative levels of drug residues in meat and poultry products. In the unlikely event that a violative level is found, regulatory action is taken against FDA and FSIS on the supplier. We actively work with our producers and require on-site audits of supplier facilities to help ensure compliance.

2. Please describe how or if you educate consumers about your meat and poultry purchasing policies regarding antibiotic use in production.

We do not produce or publish information on our producers' policies pertaining to the use of antibiotics, nor do we make any claims regarding the offering of antibiotic-free products.

3-6. Please provide the percentages of beef, pork and poultry that your company purchases are produced in a manner that: (a) excludes all antibiotics, (b) includes antibiotics only for disease treatment for sick animals, (c) includes use of antibiotics only for treatment and control of disease, and (d) includes the routine use of antibiotics:

Our producers do not provide us with data on the number of farm animals or poultry in our food supply that may have been treated with antibiotics as allowed under federal regulations.

7. Please inform us as to any planned changes in policy regarding the use of antibiotics to produce meat purchased by your company due to human health concerns or consumer demand.

We will continue to support the implementation of new FDA regulations and guidelines governing the appropriate use of antibiotics, such as the above-mentioned documents published in the Federal Register.

We understand that many of our suppliers have received similar letters of inquiry from you. We respectfully refer you to their responses for additional information on their policies and practices pertaining to this issue.

In closing, we are proud of our strong reputation when it comes to food safety, and we will continue to hold our producers accountable for the appropriate use of antibiotics in the animals they purchase.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Marie McNamara", with a long horizontal flourish extending to the right.

Ann Marie McNamara
Division Vice President
Product Safety & Quality Excellence



975 F Street, NW – Suite 1000
Washington, DC 20004

Abigail P. Blunt
Senior Director, External Relations
Government Affairs

Phone: 202.942-4340
Fax: 202.942.4335
www.kraftfoodscompany.com

June 15, 2012

Hon. Louise Slaughter
Member of Congress
2469 Rayburn Building
Washington, DC 20515-3221

Dear Representative Slaughter:

We received your letter inquiring about the use of antibiotics in food animal production, and appreciate your concerns regarding how the use of such products impact human health. Although Kraft Foods does not have all of the information you requested, I can provide you with the following.

Kraft Foods does not raise cattle, pigs or poultry, but it purchases beef, pork and poultry for its Oscar Mayer line of products. Antibiotics are essential to the humane and proper treatment of animals and they should be used judiciously and under veterinary supervision. That is why Kraft Foods requires our suppliers and their farm families to meet or exceed government regulatory requirements and industry standards concerning the use of antibiotics in food animals.

Kraft Foods expects its suppliers to look to programs such as the National Pork Board's Pork Quality Assurance Plus and the National Cattlemen's Beef Association Beef Quality Assurance program to provide principles and guidelines for judicious antibiotic use. For turkey, we expect our suppliers to follow the "prudent use" guidelines adopted in 1998 by the American Veterinary Medical Association in conjunction with the U.S. Food and Drug Administration (FDA) and the Centers for Disease Control and Prevention (CDC).

In making our livestock and turkey purchasing decisions, we recognize and believe that farmers and ranchers work diligently to manage their livestock and turkeys in the best manner possible and that they do so through a combination of sound husbandry practices, including genetics, nutrition, housing, handling, as well as veterinary care. Producers, working with their veterinarian, are in the best position to create the animal health strategies and protocols on farms today. In short, optimal animal health and welfare is not only good for farmers and ranchers, it is good for the rest of the food production chain, and it is essential to helping ensure a safe and affordable food supply.

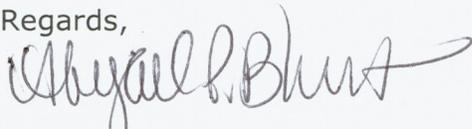
Kraft Foods supports the FDA approval process for veterinary drugs, which was made more vigorous with the addition of significant FDA risk assessment requirements several years ago. We also support the federal residue monitoring of all meat and poultry, which demonstrates the cooperation among animal health companies, feed companies, producers, and regulatory agencies to help ensure that antimicrobial products are used appropriately.

Given that FDA regulations provide that labels of approved animal medicines have very clear "withdrawal time" requirements for the medicines' use, our suppliers should have appropriate protocols in place to ensure the animals are not introduced into the food supply until the medicines have sufficiently cleared the animals' systems.

In addition, we are following the changes being implemented by the FDA, which recently published additional guidance documents implementing its policy to phase out sub-therapeutic use and phase-in veterinary oversight for all medically important antibiotics. We believe this is a pragmatic approach and will evaluate how we can support adoption of practices that are aligned with these principles.

I hope this information is useful to you. If you have any questions about the information provided above, please contact me.

Regards,

A handwritten signature in black ink, appearing to read "Abigail P. Blunt". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Abigail P. Blunt
Senior Director, External Relations



McDonald's Corporation
Government Relations
1099 New York Avenue NW
Suite 510
Washington, DC 20001-4493
Office: (202) 469-8020
Fax: (202) 469-8027

June 13, 2012

Hand-delivered

The Honorable Louise Slaughter
U.S. House of Representatives
2469 Rayburn House Office Building
Washington, DC 20515-3221

Re: Antibiotics Inquiry

Dear Representative Slaughter:

I am writing in response to your earlier letter to McDonald's Corporation regarding the use of antibiotics in the production of meat and poultry. McDonald's is committed to ensuring wholesome and safe food for our customers. Food safety is McDonald's number one priority and is central to all of our company's operations and supply programs as we feed more than 68 million customers a day worldwide. As a global company, we are aware that the use of antibiotics in food animals is a subject of debate in many countries around the world, by scientists, policy makers, and other concerned stakeholders. For purposes of your inquiry, we will focus this response on our U.S. business which is operated by McDonald's USA, LLC ("McDonald's").

McDonald's recognizes the importance of having effective antibiotics available for the purpose of treating infections both in humans and animals. We believe that rigorous review and approval processes conducted by FDA in combination with voluntary, market-based actions – informed by science and implemented with transparency - can help ensure the efficacy of antibiotics that play an important role in treating disease. McDonald's supports the federal residue monitoring of meat and poultry, an effort that demonstrates how cooperation at various levels in the meat and poultry supply chain and regulatory agencies can help ensure the appropriate use of antibiotics in the food chain. To that point, we do not oppose the responsible use of antibiotics to treat sick animals in appropriate circumstances.

Several years ago, McDonald's developed guidelines for our supply chain regarding the use of antibiotics in food animals ("McDonald's Global Policy on Antibiotic Use in Food Animals"). McDonald's Policy encourages the use of disease prevention strategies, recognizes the importance of the sustainable judicious use of antibiotics and emphasizes compliance with all

applicable regulatory requirements. The Policy also prohibits the use of antibiotics belonging to classes of compounds approved for use in human medicine when used solely for growth promotion purposes (i.e., subtherapeutic—the use of antibiotics for any purpose other than disease treatment, control or prevention). I am attaching a complete copy of our Policy for your reference. The policy also is posted on our website for consumers and stakeholders who want to learn more about our position on this issue.

http://www.aboutmcdonalds.com/content/dam/AboutMcDonalds/Sustainability/Sustainability%20Library/antibiotics_policy.pdf

It is important to note that McDonald's has a complex supply chain with many different levels of direct and indirect suppliers. The Policy applies to those suppliers that raise animals and with whom McDonald's has a direct relationship in the meat purchasing supply chain process. That category of suppliers currently consists of the dedicated facilities of our direct-relationship poultry suppliers, which account for the majority of our chicken menu items sold in the US. When necessary (e.g., as production demand rises), we do source boneless chicken from our suppliers' other (i.e., non-dedicated) operations. We do want to note that McDonald's does not currently have direct business relationships with the ranches and farms that provide other food animals to our direct suppliers.

McDonald's remains committed to serving wholesome and safe food for our customers. As an industry leader, McDonald's will continue to look to scientific evidence to guide us on this issue, and to our suppliers for continued compliance with all applicable laws and regulations.

I hope this information is helpful as you review this complex issue. Thank you for giving McDonald's an opportunity to provide feedback on this important matter.

Best regards,

A handwritten signature in black ink, appearing to read 'Steve Hilton', with a horizontal line extending to the right.

Steve Hilton
Vice President, Government Relations
McDonald's Corporation



McDonald's Corporation
Government Relations
1099 New York Avenue NW
Suite 510
Washington, DC 20001-4493
Office: (202) 469-8020
Fax: (202) 469-8027

Restricting Antibiotic Use :: AboutMcDonalds.com - Mozilla Firefox

File View History Bookmarks Tools Help

Restricting Antibiotic Use :: A... +

www.aboutmcdonalds.com/mcd/sustainability/library/policies_programs/sustainable_supply_chain/product_safety/antibiotics.h

The screenshot shows a web browser window displaying the McDonald's website. The page title is "Restricting Antibiotic Use". The browser's address bar shows the URL: www.aboutmcdonalds.com/mcd/sustainability/library/policies_programs/sustainable_supply_chain/product_safety/antibiotics.h. The website header features the McDonald's logo and navigation links: OUR COMPANY, INVESTORS, FRANCHISING, SUSTAINABILITY, NEWSROOM, CAREERS, and LET'S TALK. The main content area has a header image showing books and McDonald's reports. The main text reads: "Restricting Antibiotic Use. McDonald's global minimum standard prohibits the use of antibiotics belonging to classes of compounds approved for use in human medicine when used solely for growth promotion purposes. This applies to all global suppliers where McDonald's has a direct relationship in the meat purchasing supply chain process. Today, this means that poultry suppliers and our direct-relationship poultry suppliers (approximately 60% of our poultry supply) around the world acknowledge their compliance with our [antibiotics policy](#). For suppliers with whom McDonald's does not have a direct relationship, compliance with this policy is a favorable factor in purchasing decisions. Some McDonald's markets have government regulations that supersede McDonald's policy. In Europe, for example, use of antibiotics for any purpose other than disease treatment or prevention is prohibited for all products." On the right side, there is a "Sustainability" sidebar with a list of focus areas: Our Focus Areas, Signature Programs, Sustainability Library, Policies & Programs, Nutrition & Well-Being, Sustainable Supply Chain, Animal Welfare, Product Safety, To: Safety, Restricting Antibiotic Use (highlighted with a red arrow), Animal Cloning, Nanotechnology, Beef, Coffee, Environmental Scorecard, Supplier/Workplace Accountability, and Packaging Scorecard.

McDonald's Global Policy on Antibiotic¹ Use in Food Animals²

Introduction

McDonald's recognizes that the use of antibiotics in food animals is under active review by scientists and regulators around the world, and we support these transparent, science-based processes. We also recognize the importance of combating antibiotic resistance, and believe that voluntary, market-based actions can complement ongoing activities to address the issue of antibiotic resistance. McDonald's policy represents one such complementary step and provides the foundation for further work on the sustainable use of antibiotics. McDonald's policy was formed with input from a variety of experts, including physicians, suppliers, animal welfare scientists, veterinarians, retail representatives, and environmental experts. We know that scientific understanding of antibiotic resistance continues to grow, and we will update our policy as necessary to remain consistent with available scientific information.

Executive Summary

- All uses of antibiotics in food animal production should follow the Guiding Principles for Sustainable Use. Sustained reductions in the total use of antibiotics belonging to classes of compounds currently approved for use in human medicine are encouraged and will be considered a favorable factor in supply decisions.
- The use of those antibiotics belonging to classes of compounds currently approved in one or more countries worldwide for use in human medicine is prohibited when used solely for growth promotion purposes³.
- McDonald's Antibiotics Use Policy applies to all global suppliers where McDonald's has a "direct relationship" in the meat purchasing supply chain process. For suppliers with whom McDonald's does not have a "direct relationship", compliance with this policy will be a favorable factor in supply decisions.
- McDonald's Antibiotics Use Policy will be enforced through supplier certification and assurance programs or regular audits. This policy is to be phased in by the end of 2004.

Rationale

McDonald's is committed to a global policy on the sustainable use of antibiotics because:

1. Antibiotics are important for maintaining health and welfare and reducing morbidity and mortality of food animals.
2. Antibiotic use contributes to the selection of antibiotic resistance in disease causing bacteria.
3. Antibiotic-resistant bacterial pathogens are a risk to human and animal health because they compromise the effectiveness of antibiotics used in human and veterinary medicine.
4. All users of antibiotics, including those who supervise use in animals and those who supervise use in humans, must work to sustain the long-term efficacy of antibiotics for human and veterinary medicine.

¹ The term antibiotic is used in this policy to refer to both antibiotics (as defined in the Definitions section below) and synthetic agents that have an antibiotic effect (commonly referred to as antimicrobials). This policy allows the use of ionophores and other anticoccidials for the treatment and prevention (as defined by this policy) of coccidiosis. The use of anticoccidials from classes of drugs not approved for use in human medicine is permitted for other purposes as approved by applicable regulatory authorities. Use of these compounds is not linked to the development of resistance in bacteria that cause disease in humans.

² The term food animal is used in this policy to refer to all species of farmed animals including cultivated fish and shellfish.

³ When drug combinations are used, this policy applies to every antibiotic in the combination.

McDonald's Global Antibiotic Policy

All uses of antibiotics in food animal production should follow the Guiding Principles for Sustainable Use.

McDonald's prohibits the use of antibiotics belonging to classes of compounds approved for use in human medicine when used solely for growth promotion purposes. Growth promotion is defined as the use of antibiotics for any purpose other than disease treatment, control or prevention (as defined in the Definitions section below).

Guiding Principles for Sustainable Use of Antibiotics

Sustainable use of antibiotics is the foundation of McDonald's Antibiotic Policy.

The concept of sustainability is based on conserving natural and social resources in the present and future while creating economic value. The following principles of sustainable use draw from existing frameworks including the World Veterinary Association's *Prudent Use of Antibiotics Global Basic Principles* and the American Veterinary Medical Association's *Judicious Therapeutic Use of Antimicrobials General Principles*.

- 1. Quality and safety:** McDonald's is committed to ensuring wholesome and safe food for our customers. Food safety is McDonald's number one priority and is central to all company operations and supply programs.
- 2. Animal welfare:** Treating animals with care is integral to McDonald's overall quality assurance and animal welfare programs. Disease prevention strategies, such as good husbandry and hygiene, routine health monitoring, and immunization, and other preventative options should be emphasized before the use of antibiotics.
- 3. Antibiotics for animals:** Sustainable use of antibiotics is an integral part of an overall animal care and welfare program. Animals that are ill or at imminent risk of becoming ill must be treated. Sustainable use of antibiotics complements good animal husbandry practices.
- 4. Supervise use:** Antibiotics shall be used in accordance with all applicable regulatory requirements. The use of antibiotics for disease prevention, control or treatment shall occur only under the oversight of a veterinarian who meets all applicable requirements for training and certification. All uses and prescriptions must be based on current pharmacological information and principles. Antibiotics shall be used only in accordance with the product license requirements or as directed by a veterinarian.
- 5. People first:** Antibiotics that are in classes used in human medicine may be used in animals for disease treatment, control or prevention only in accordance with applicable regulatory requirements and after thorough consideration of alternatives, including the use of antibiotics belonging to classes not used in human medicine.
- 6. Limit exposure:** Exposure to antibiotics for disease treatment, control or prevention should be minimized by limiting treatment to ill animals or animals at risk of a specific disease, using the narrowest spectrum antibiotic, treating the fewest animals indicated, and treating only for as long as needed for the desired clinical response. The use of antibiotics for disease control or prevention should be reviewed regularly to determine continued need. Antibiotic use should be confined to appropriate clinical indications. Extra-label therapies should be prescribed only after other treatment options have been exhausted, and should be prescribed in accordance with the most up-to-date laws and regulations that govern drug use and in accordance with McDonald's Antibiotics Use Policy. Dispersal of antibiotics into the environment should be minimized.
- 7. Record keeping:** Suppliers must maintain accurate records of all antibiotic administrations for the purpose of certifying compliance with the policy, including the elimination of growth promotion uses of antibiotics belonging to classes of compounds approved for use in human medicine and compliance with the Guiding Principles for Sustainable Use. Records of extra-label therapies should be delineated.

Compliance

- **Supplier certification:** Every supplier under this policy must certify in writing their commitment to abide by McDonald's Antibiotic Use Policy in all of their operations that supply McDonald's anywhere in the world regardless of local practices. Certification must include alignment of all policies and practices regarding the use of antibiotics.
- **Assurance:** Suppliers will maintain records of antibiotic use and document compliance through an internal assurance program and by regular audits.

Implementation

- **Policy applied in "direct relationships":** McDonald's Antibiotic Use Policy will apply and compliance will be assured in those areas of our global supply chain where we have a "direct relationship," defined as facilities dedicated to producing products for McDonald's. The policy will be fully implemented in those areas by the end of 2004.
- **Progress reporting:** Suppliers not currently in compliance with this policy will be expected to share their implementation plans with McDonald's and report annually on progress toward achieving compliance.
- **Supply decisions:** With regards to supply where we do not have "direct relationships" and compliance is not mandatory, compliance will be a favorable factor in supply decisions. Additional measures leading to demonstrated, sustained reductions in the use of antibiotics belonging to classes approved for use in human medicine will also be considered a favorable factor in supply decisions.
- **Regular review:** It is our intention that McDonald's Antibiotic Use Policy does not conflict with government measures and that compliance is consistent with or more restrictive than all applicable laws. This policy will be updated as guided by new scientific knowledge.
- **Minimum global standard:** This policy provides a set of minimum global standards for antibiotic use. Any existing McDonald's policies or standards in individual markets that go beyond these minimum standards remain in effect.
- **Industry advocate:** McDonald's advocates the expansion and adoption of sustainable antibiotic use beyond areas in which we have "direct relationships," both within our supply chain and within the industry as a whole.

Definitions

Antibiotic: This policy uses the term 'antibiotic' to refer to both "Substances of natural origin that are used for treatment of infection or disease that kills or inhibits the growth or multiplication of microorganisms" (*American Veterinary Medical Association Judicious Therapeutic Use of Antimicrobials*, <http://www.avma.org/scienact/jtua/jtua98.asp>), and synthetic agents that have an antibiotic effect (commonly referred to as antimicrobials.)

Narrow Spectrum Antibiotic: an antibiotic effective against a limited number of bacterial genera. Often applied to an antimicrobial active against either Gram-positive or Gram-negative bacteria.

Broad Spectrum Antibiotic: an antibiotic effective against a large number of bacterial genera; generally describes antibiotics effective against both Gram-positive and Gram-negative bacteria.

Anticoccidial: Antibiotics that are used to prevent or treat coccidia, single cell protozoan parasites that attack the intestinal tract and are especially prevalent when animals or birds are grouped together in large numbers. Anticoccidials are extremely useful in most poultry rearing operations to prevent illness and treat infections.

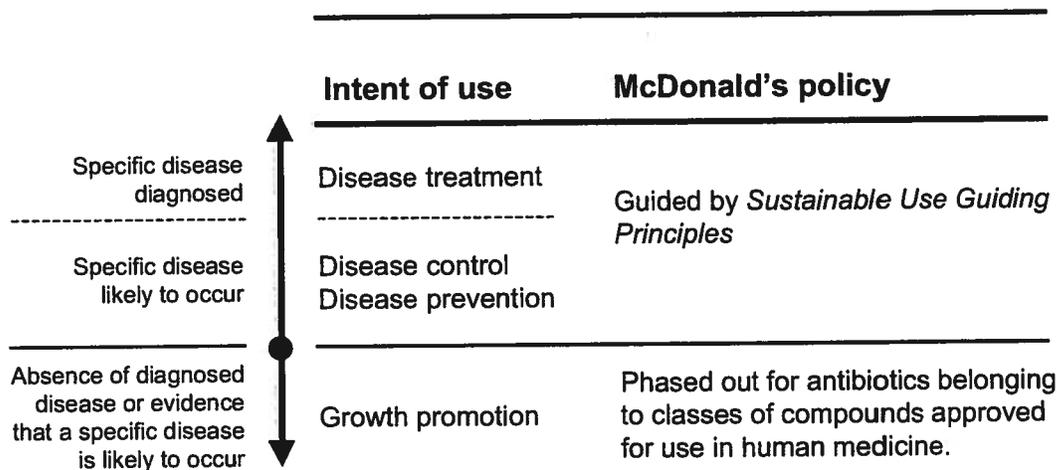
Disease Treatment: Use of antibiotics, under the direction of a certified veterinarian, for the specific purpose of treating animals with an established disease or illness. Once the treatment is over and the animal is cured, the application of the antibiotic ceases. (Adapted from the World Veterinary Association's *Prudent Use of Antibiotics Global Basic Principles* and *Canadian Committee on Antibiotic Resistance*, <http://www.ccar-ccra.org/agriglos-e.htm>.)

Disease Control: Disease control is defined for the purposes of this policy to be the administration of an antibiotic in a herd or flock situation, rather than to an individual animal, for a limited duration with the purpose of reducing incidence of a specific disease following exposure to the related infectious agent. The use of antibiotics for disease control is further described under McDonald's Antibiotics Policy's Sustainable Use Guiding Principle 6 – Limit exposure.

Disease Prevention: The administration of an antimicrobial to healthy animals prior to an expected exposure to an infectious agent or, following such an exposure prior to onset of laboratory-confirmed clinical disease. Generally, such usage is in a herd or flock situation and not an individual animal. (*WHO Global Principles For The Containment Of Antimicrobial Resistance In Animals Intended For Food*, http://www.who.int/emc/diseases/zoo/who_global_principles/annex_1.htm.)

Use of antibiotics for prevention of disease can only be justified where it can be shown that a particular disease is present on the premises or is likely to occur. (*WHO Global Principles for the Containment of Antimicrobial Resistance in Animals Intended for Food*, http://www.who.int/emc/diseases/zoo/who_global_principles.html.)

Growth Promotion: The use of certain antimicrobials in low concentrations in feed in the absence of diagnosed disease or evidence that a specific disease is likely to occur which results in animals growing faster than animals not given such drugs over the same time period or for the same amount of feed consumed. (adapted from *Canadian Committee on Antibiotic Resistance*, <http://www.ccar-ccra.org/agriglos-e.htm>.)



Sub-therapeutic Use: There are many different and conflicting definitions of sub-therapeutic use of antibiotics. Since there is no commonly accepted definition, this policy does not use this terminology.

June 2003



May 30,2012

Honorary Louise Slaughter
Congress Of The United States
2469 Rayburn Building
Washington, D.C. 20515-3221

Dear Congresswoman Slaughter;

In response to your letter, dated February 16, please see below the responses you are requesting.

1. We do not ever administer antibiotics from egg to table. We have internal and third party protocols in place that must be followed with zero tolerance.
2. We educate through our website, point of sale, as well as social media.
3. 100% is produced without antibiotics.
4. Less than 1% is treated with antibiotics for disease, but these are not sold under the Murray's label.
5. Zero percent.
6. Zero percent.
7. No planned changes at this time.

Please feel free to contact me at 845-558-1266 or sgold@murrayschicken.com if you require additional information. Please continue your valiant effort to reduce the unnecessary use of antibiotics in our food supply.

Sincerely,

A handwritten signature in black ink that reads "Steve Gold".

Steve Gold, Vice President Sales and Marketing

28 Lady Godiva Way, New City, NY 10956
845-639-3154
Murrayschicken.com



National Beef[®]

June 14, 2012

JUN 21 2012

Hon. Louise Slaughter
Member of Congress
2469 Rayburn Building
Washington, DC 20515-3221

Dear Representative Slaughter:

National Beef Packing Company, LLC (“National Beef”) received your letter dated February 16, 2012 inquiring about the use of antibiotics and the production of meat and poultry.

National Beef processes, packages and delivers fresh and frozen beef and beef by-products for sale worldwide to customers such as retailers, food service providers, distributors and further processors. We tailor our products and develop programs to meet a broad variety of consumer needs, tastes and preferences. These products and programs include beef produced from cattle that have not been treated with antibiotics (“Antibiotic-Free Programs”).

As a beef processing Company, National Beef’s business consists primarily of procuring cattle, processing the cattle into beef and beef by-products, and packaging and delivering our products to our customers. As such, National Beef does not generally feed or treat animals and accordingly does not possess much of the information you requested. We can, however, provide you with the following information.

National Beef supports the Food and Drug Administration’s (“FDA”) stringent approval process for veterinary drugs. We also support the federal residue monitoring of all meat and poultry, which demonstrates the cooperation among animal health companies, feed companies, producers, and regulatory agencies to help ensure that antimicrobial products are used appropriately.

FDA regulations require that labels of approved animal medicines have very clear “withdrawal time” requirements for the medicines’ use. National Beef expects its cattle suppliers to administer antibiotics in compliance with these withdrawal time requirements and to have protocols in place to ensure that the animals are not introduced into the food supply until the medicines have sufficiently cleared the animals’ systems. We also expect our suppliers to work with trained veterinarians in administering antibiotics consistent with the American Veterinary Medical Association’s comprehensive guidelines regarding the judicious therapeutic use of

*P.O. Box 20046 • Kansas City, MO 64195-0046
12200 N. Ambassador Drive, Suite 500 • Kansas City, MO 64163
1-800-449-BEEF • www.nationalbeef.com*

Hon. Louise Slaughter

June 14, 2012

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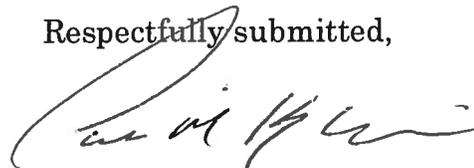
antimicrobials (www.avma.org). In addition, we audit selected cattle suppliers who supply cattle for our Antibiotic-Free Programs to test for compliance with our program attributes.

National Beef supports the policy changes FDA currently is implementing to phase out sub-therapeutic use and phase-in veterinary oversight for all medically important antibiotics. We believe these changes will be welcomed by consumers and can lead to a better understanding of the important role antibiotics plays in keeping food animals healthy.

We believe that farmers and ranchers work diligently to manage their livestock in the best manner possible through a combination of sound husbandry practices, including genetics, nutrition, housing, handling, and veterinary care. Livestock producers, working with their veterinarian, are in the best position to create the animal health strategies and protocols on farms today. Optimal animal health and welfare is not only good for farmers and ranchers—it is good for the rest of the food production chain and is essential to help ensure a safe, affordable, and abundant food supply.

I hope this information has proven useful to you. If you have any questions about the information provided above, please contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Timothy M. Klein", written in a cursive style.

Timothy M. Klein



Enhancing the quality of life for all we serve

June 12, 2012

Hon. Louise Slaughter
Member of Congress
2469 Rayburn Building
Washington, DC 20515-3221

Dear Representative Slaughter:

The National Restaurant Association is the leading business association for the restaurant and food service industry. The industry is comprised of 970,000 restaurant and food service outlets, many of which are owned by small businesses.

We are aware that in February, you sent letters to some of our members asking for information regarding the use of antibiotics in their meat and poultry purchases. While we anticipate that companies will respond directly to you, we would like to provide you with some background about the restaurant industry regarding your request.

Animal welfare is an important issue to restaurateurs who recognize that treating animals humanely is an important part of their quality assurance efforts. Our members believe that farmers and ranchers work diligently to manage their livestock in the best manner possible. We trust that they do so through a combination of sound husbandry practices, including genetics, nutrition, housing, handling, as well as veterinary care. Optimal animal health and welfare is not only good for farmers and ranchers, it is good for the rest of the food production chain, and it is essential to ensuring a safe, affordable, and abundant food supply for our guests.

The restaurant industry recognizes that use of antibiotics in food animals is being actively debated. As an understanding of the risks and benefits of antibiotic use in food animals continues to evolve, we support the active review by scientist and regulators and the adoption of sound scientific policies and practices.

Our industry supports the stringent Food and Drug Administration (FDA) approval process for veterinary drugs, which was made even more vigorous with the addition of significant FDA risk assessment requirements several years ago. We have followed the changes being implemented by FDA, which recently published additional guidance documents implementing its policy to phase out sub-therapeutic use and phase-in veterinary oversight for all medically important antibiotics. We also support the long-standing federal residue monitoring program of all meat and poultry, which demonstrates

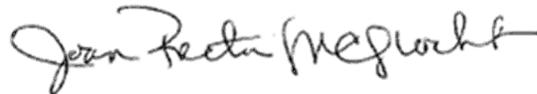
the cooperation among animal health companies, feed companies, producers, and regulatory agencies to help ensure that antimicrobial products are used appropriately.

Many of our members are actively working with their suppliers to ensure that the use of antibiotics in food animals is being addressed in compliance with applicable laws and regulations. While some have specific procurement policies addressing antibiotics, most restaurateurs rely upon established government regulations to ensure that suppliers are utilizing technologies and products, such as antibiotics, in a judicious and appropriate manner.

With the reliance that their suppliers are in conformity with all applicable laws and regulations, most of our members do not have the level of detail that you have requested in your letter. Additionally, some of our members regard the information you requested as proprietary to their brand and thus believe that the requested information is to be protected from public disclosure. Consequently, some of our members will not be able to provide you with the level of detail you requested.

I hope this information has proven useful to you. If you have any questions about the information provided above, please contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joan Pectin McGlockton". The signature is fluid and cursive, with the first name "Joan" being the most prominent.

Joan McGlockton
Vice President, Industry Affairs & Food Policy
National Restaurant Association



June 15, 2012

By Regular Mail (with e-mail copy to carolyn.shore@mail.house.gov)

Hon. Louise Slaughter
Member of Congress
2469 Rayburn Building
Washington, DC 20515-3221

Re: February 16, 2012 letter regarding antibiotics in the production
of meat and poultry

Dear Representative Slaughter:

By way of introduction, I am the Chief Legal Officer and General Counsel of Panera, LLC ("Panera").

We are in receipt of your letter dated February 16, 2012 inquiring about the use of antibiotics in the production of meat and poultry.

As you may know, Patrice McInnis (who also works at Panera) and I have twice spoken with Carolyn Shore of your office regarding your letter, this reply and, most importantly, how we might be of assistance to you and your office regarding your industry review and objectives.

As we explained to Carolyn, your concerns are important to Panera.

Not intending to sound like an ad, Panera truly does strive to serve high quality "clean" food at a reasonable price point to its broad base of guests.

To this end, and I believe consistent with your objectives, almost a decade ago, Panera started serving antibiotic free chicken in certain sandwiches and salads. Today, **all** of Panera's sandwiches and salads that feature chicken are made with antibiotic free chicken. Moreover, last year, Panera introduced an antibiotic free roasted turkey for certain salads and sandwiches. In the restaurant sector, Panera is one of the (if not the) **largest** providers of antibiotic free chicken and turkey. In addition, a growing portion of the sausage, ham and bacon we serve is also antibiotic free (as suggested, this remains a work in progress given sourcing).

Panera is continually looking for ways to enhance its products consistent with its mission of providing high quality "clean" food to its guests. Panera works closely with its vendors towards this end, including sourcing antibiotic free products.

Hon. Louise Slaughter
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June 15, 2012

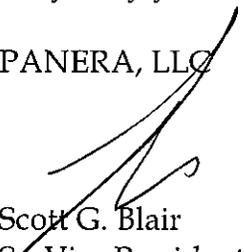
Simply, it seems we have aligned interests and Panera certainly has many years of experience and leadership in sourcing and providing "clean" food to our guests.

As we explained to Carolyn, we are happy to speak in detail with you and your staff regarding our experiences, including meeting with you in your DC or NY office, at our office in St. Louis or Needham, MA or even one of our bakery cafes.

We look forward to hearing from you and your office regarding this important mission.

Very truly yours,

PANERA, LLC



Scott G. Blair
Sr. Vice President, Chief Legal Officer and
General Counsel

cc: Ron Shaich, Chairman and Co-CEO, Panera, LLC
Bill Moreton, President and Co-CEO, Panera, LLC



The Honorable Louise Slaughter
Member of Congress
2469 Rayburn Building
Washington, DC 20515-3221

Dear Congresswoman Slaughter,

Thank you for your Feb. 16, 2012, correspondence regarding the use of antibiotics in meat and poultry production. We recognize that food safety is the No. 1 priority of American consumers when serving food to their families. Pilgrim's is committed to providing consumers with safe, wholesome food. An important part of our commitment is the legal and judicious use of antibiotics.

The use of antibiotics in animal agriculture has come under public scrutiny as consumers seek more information about how their food is produced. As consumers ourselves who proudly serve the products we produce to our own families, Pilgrim's appreciates this increased interest. Our decisions and actions are based on science to ensure the safety of our products, the integrity of our internal policies governing the use of antibiotics, and the well-being of the animals under our care.

Pilgrim's continually works with scientists to update our policies to remain consistent with the most recent scientific data available. We also rely on direction provided by the federal government to guide our use of antibiotics. As such, all antibiotics at Pilgrim's are used in strict accordance with Food and Drug Administration (FDA) and United States Department of Agriculture (USDA) regulations and guidelines.

We will continue to review relevant scientific data regarding the use of antibiotics in animal agriculture and comply with all current and future federal guidelines governing the proper use of antibiotics in poultry. We recognize our responsibilities to both the animals under our care and the consumers who enjoy our products.

As always, producing safe, wholesome and affordable food is our first priority.

Regards,

Kendra Waldbusser
Senior Vice President
Food Safety & Quality Assurance
Pilgrim's Pride Corporation



1770 Promontory Circle
Greeley, CO 80634-9039 USA

800-321-1470
www.pilgrims.com

June 6, 2012

JUN 19 2012

The Honorable Louise M. Slaughter
United States House of Representatives
2469 Rayburn House Office Building
Washington, D.C. 20515-3221

Dear Representative Slaughter:

Thank you for your recent letter regarding the use of antibiotics in the production of meat and poultry. I appreciate the opportunity to share Safeway's policies in this area, as well as information about the availability of raw meat and poultry products raised without antibiotics at Safeway and our family of stores.

As one of the largest supermarket retail chains in the United States and western Canada, Safeway is committed to providing a wide variety of safe, nutritious and affordable product options for our customers at our various operating divisions (Safeway, Vons, Dominick's, Randalls, Tom Thumb, Carrs). We currently offer two private label brands of meat and poultry items that are specifically available to our consumers who choose to purchase meat and poultry products raised without antibiotics: Open Nature and O Organics.

Safeway offers six O Organics fresh chicken products and, seasonally, a frozen turkey. In addition, we offer over 35 Open Nature items including fresh beef, pork, chicken, lamb and turkey. Also available under the Open Nature brand offerings are chicken and pork sausage, bacon, franks, and meatballs.

These products are available in our meat cases across the country where economically feasible. Customers may also request to purchase these products at their local Safeway store if they are not offered in the current item set.

To help inform our customers, Safeway maintains a list of offerings on our website, including meat items, under the Open Nature and O Organics lines, as well as FAQ sections for additional detailed information. We update these website sections from time to time, as our item selections change. Safeway also offers all natural and organic ground beef options under various national brands throughout our divisions nationally.

We constantly review consumer trends and requests, and we strive to offer our customers quality products at reasonable prices. Current limitations to product offerings include limited availability of raw material and production facilities. In addition, because consumer demand for natural and organic items is much higher for the premium cuts (e.g., loin cuts) and lower for the remaining portions, the value proposition is often skewed toward higher priced items.



Smithfield Foods, Inc.
200 Commerce Street
Smithfield, VA 23430

June 12, 2012

Hon. Louise Slaughter
Member of Congress
2469 Rayburn Building
Washington, DC 20515-3221

Dear Representative Slaughter:

Smithfield Foods, Inc. ("Smithfield") received your letter of February 16, 2012 inquiring about the use of antibiotics and the production of meat and poultry and provides the following responses.¹

As a threshold matter, Smithfield supports the stringent Food and Drug Administration ("FDA") approval process for veterinary drugs, which was made even more vigorous with the addition of significant FDA risk assessment requirements several years ago. We also support the federal residue monitoring of all meat and poultry, which demonstrates the cooperation among animal health companies, feed companies, producers, and regulatory agencies to help ensure that antimicrobial products are used appropriately.

In making our livestock purchasing decisions, we recognize and believe that farmers and ranchers work diligently to manage their livestock in the best manner possible and that they do so through a combination of sound husbandry practices, including genetics, nutrition, housing, handling, as well as veterinary care. Livestock producers, working with their veterinarian, are in the best position to create the animal health strategies and protocols on farms today. In short, optimal animal health and welfare is not only good for farmers and ranchers, it is good for the rest of the food production chain, and it is essential to helping ensure a safe, affordable, and abundant food supply.

Against that background, Smithfield maintains rigorous policies, procedures and purchasing specifications with respect to the swine we raise and meat products that we acquire. We require our livestock suppliers to utilize technologies and products, including the use of animal health products such as antibiotics, in a judicious and appropriate manner. Since 2002, we have had a formal and publicly available antibiotics use policy that outlines our commitments and usage requirements for antibiotics.² Adherence to the policy is obligatory for anyone who works with the animals owned or managed by or under contract to our hog

¹ This response is also sent on behalf of Smithfield's independent operating companies, including Farmland Foods, Inc., The Smithfield Packing Co., Inc., John Morrell & Co., and Murphy-Brown LLC.

² See <http://www.smithfieldcommitments.com/core-reporting-areas/animal-care/animal-care-spotlights/antibiotic-use-in-hogs/>

production subsidiary. We review our policy periodically to confirm it is up-to-date with the best science of the day.

Our policy calls for the responsible use of antibiotics for three specific purposes: to prevent disease, control disease, and treat disease, with proper diagnostic confirmation. Sound science tells us that the healthier the animal, the safer the food. Antibiotics are given strategically when pigs are sick or injured, or when they may be exposed to illnesses. Antibiotics are not continuously fed to our animals. We do not use antibiotics for growth promotion purposes, nor do we use hormones in pigs to promote growth. (In fact, there are no hormones approved by the FDA for growth promotion in pigs.)

Smithfield hog-raising operations employ a team of about 15 licensed staff veterinarians who scrutinize, evaluate, and adjust the antibiotics used on our farms. The veterinarians consult with our staff nutritionists and production specialists to make informed, science-based decisions about which type of antibiotics to use, when and how the antibiotics should be administered and for how long. Smithfield also expects our suppliers to look to programs such as the National Pork Board's Pork Quality Assurance Plus and the National Cattlemen's Beef Association Beef Quality Assurance program to provide principles and guidelines for judicious antibiotic use.

FDA regulations provide that labels of approved animal medicines have very clear "withdrawal time" requirements for the medicines' use. Smithfield similarly requires that when antibiotics are administered our suppliers have protocols in place to ensure that the animals are not introduced into the food supply until the medicines have sufficiently cleared the animals' systems. To that end, we insist that our suppliers work closely with a trained veterinarian. Indeed, the American Veterinary Medical Association has comprehensive guidelines pertaining to the judicious therapeutic use of antimicrobials.³

A small percentage of our own hogs are raised without antibiotics on designated farms in response to a niche market segment. However, if one of the pigs in this program becomes ill, we will treat that animal with antibiotics and remove it from the antibiotics-free program. This program is targeted at a select group of customers who are willing to pay up to 30 percent more to cover the higher production costs for hogs raised in this manner.

In addition, we are following with great interest the changes being implemented by FDA, which recently published additional guidance documents implementing its policy to phase out sub-therapeutic use and phase-in veterinary oversight for all medically important antibiotics. We believe these changes will be welcomed by consumers and can lead to a better understanding of the important role antibiotics plays in keeping food animals healthy.

³ <http://www.avma.org/reference/jtua.asp>

I hope this information has proven useful to you. If you have any questions about the information provided above, please contact Stewart Leeth at 757.357.8164.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Dennis H. Treacy', with a long horizontal stroke extending to the right.

Dennis H. Treacy
Executive Vice President &
Chief Sustainability Officer

Safeway does have a policy statement about antibiotic use in meat, which is as follows:

Policy Statement:

Safeway Inc. is committed to providing safe, wholesome food products and part of that commitment is in support of the responsible use of antibiotics as a health management tool for use with livestock to prevent and treat disease. The use of antibiotics is heavily regulated by the US Food and Drug Administration (FDA) and the US Department of Agriculture (USDA). Safeway is in support of FDA approved product use in livestock production and supports the FDA's recommended withdrawal time and random residue testing conducted by USDA through the National Antimicrobial Resistance Monitoring System. Antibiotics are administered under the guidance of certified veterinarians or trained personnel who follow regulations set forth by the Animal Medicinal Drug Use Clarification Act and comply with the Judicious Use Guidelines established by the American Veterinary Medical Association. Withholding medicine from sick animals is inhumane and does not comply with our Animal Welfare program however; animals produced for Safeway's Rancher's Reserve Beef Program will be removed from the program if antibiotic treatment is administered more than twice in an animal's life-span.

As a leader in the grocery industry, Safeway actively pursues growth through leadership in environmental, socially responsible and ethical business practices. Corporate social responsibility is core to Safeway's operating philosophy, and that commitment drives our dedication to People, Products, Community, and the Planet.

Please feel free to contact me directly at kate.coler@safeway.com or 202-239-3928 if I can be of further assistance.

Sincerely,



Kate Coler
Vice President
Federal Government Relations



June 14, 2012

The Honorable Louise M. Slaughter
2469 Rayburn House Office Building
Washington, D.C. 20515-3221

Via Facsimile: (202) 225-7822

Dear Congresswoman Slaughter:

Thank you for contacting Starbucks Coffee Company regarding the use of antibiotics in the production of meat and poultry. We appreciate the opportunity to share some information about our company and related practices.

By way of background, Starbucks was founded over 40 years ago as a company that believed it was possible to balance good business with uncompromising values. One of those values is promoting health and wellness. Over the last several years, Starbucks has decreased the calorie and fat content in our offerings and eliminated artificial flavors, dyes, trans fat, preservatives, and other artificial ingredients where we can in our food. Additionally, we have made nutritional information easier to access and understand, including via brochures in our stores, the nutritional information page on our website, and our iPhone nutrition application.

Starbucks supports rigorous food safety standards and practices, including stringent inspection, approval, risk assessment, quality assurance, monitoring and surveillance programs designed to address the use of antibiotics used for food producing animals. Meat and poultry producers and processors are subject to regulatory requirements established by the United States Department of Agriculture ("USDA") working together with the Food & Drug Administration ("FDA") to ensure that livestock are suitable for human consumption. These requirements include a regulatory system governing the appropriate use of antibiotics in food use animals. As part of that system, meat and poultry products are subject to an inspection and approval process before they are sold to end-users like Starbucks, and we maintain a

rigorous oversight system to assure that all of our meat and poultry suppliers fully comply with this process. Although Starbucks Coffee Company procures a relatively small amount of meat and poultry, we take our obligations very seriously.

We support your efforts to engage directly with USDA and FDA regarding the regulatory requirements to which meat and poultry producers and processors are subject, in order to determine whether it is appropriate to take further steps in this area, and we support the recent FDA initiative to encourage meat and poultry producers to reduce the quantities of antibiotics given to animals to promote growth.

Thank you again for your work on this important issue.

Sincerely yours,



Mary K. Wagner, Ph.D.
Senior Vice President, Global Quality Assurance
Starbucks Coffee Company



June 25, 2012

The Honorable Louise M. Slaughter
United States House of Representatives
2469 Rayburn Building
Washington, DC 20515-3221

Dear Representative Slaughter:

I write in my capacity as the Director of Government Affairs for Ahold USA, Inc. ("AUSA") in response to your letter dated February 16, 2012 directed to The Stop & Shop Supermarket Company LLC concerning its policies on the purchase of meat and poultry products from animals treated with antibiotics.

AUSA is the parent company of Stop & Shop and supports four regional Divisions – Stop & Shop New England, Stop & Shop New York Metro, Giant Landover, and Giant Carlisle – that operate in the Northeast and Mid-Atlantic and together operate more than 750 supermarkets, as well as Peapod, Inc., the nation's leading online grocer.

Food safety is the top priority at all AUSA operating units. We work closely with our meat and poultry suppliers, government regulators and industry groups to provide safe, affordable and nutritious products from healthy animals to our customers every day. AUSA operating units comply with all applicable laws and regulations and they support programs administered by the U.S. Food and Drug Administration, Environmental Protection Agency and Department of Agriculture concerning the use and monitoring of and testing for antibiotics in animals that are used to produce meat and poultry products, including without limitation the National Residue Program pursuant to which meat and poultry products are sampled and inspected to prevent adulterated meat from entering into commerce.

Ahold USA supports FDA's recent actions to address unnecessary use of antibiotics in food animal production. AUSA operating units support the goal of bolstering existing programs to ensure that they each achieve their stated objectives while meeting consumer expectations concerning the variety, safety and affordability of the meat and poultry products they purchase. AUSA continues to monitor and work with industry in supporting the reduction of unnecessary antibiotic use in animals.

In addition to their own food safety policies and procedures applicable Division stores and distribution facilities, it is the policy of each Division and Peapod to purchase meat and poultry products only from federally inspected plants.

In addition to their focus food safety, AUSA operating units are also committed to providing their customers with choices when they shop to meet their varying food needs and interests. They offer their customers a variety of fresh and frozen meat and poultry items, including free range poultry, natural items and organic meat and poultry that have been produced without hormones or antibiotics.

We thank you for your interest in keeping our nation's food supply safe for our customers.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Thomas Cormier', written over a light blue horizontal line.

Thomas Cormier
Director of Government Affairs
Ahold USA, Inc.
(717) 960-5794
Thomas.cormier@ahold.com



serviced by
FRANCHISE WORLD HEADQUARTERS, LLC
325 Bic Drive, Milford, CT 06461 • (203) 877-4281

June 15, 2012

Representative Louise M. Slaughter
Member of Congress
2469 Rayburn Building
Washington, DC 20515-3221

JUN 25 2012

JUN 25 2012

Dear Representative Slaughter:

Thank you for your request for information regarding the use of antibiotics in the livestock used for our meat and poultry products. We recognize that use of antibiotics in food animals is a growing public health concern and coming under increased scrutiny. To that end, we support active scientific review of animal welfare practices regarding antibiotic use and the adoption of the best science based practices and policies throughout the industry. Although we do not have access to much of the information you requested, we can provide you with the following:

We support the stringent FDA approval process for veterinary drugs, the regulations for judicious use of antibiotics and support the changes that the FDA recently published to phase out sub-therapeutic use and phase-in veterinary oversight for all medically important antibiotics. We believe these changes will lead to a better understanding of the important role of antibiotics in keeping livestock healthy and our food supply safe and abundant. Furthermore, we believe and that these changes will be embraced by the industry and will be well received by consumers.

The SUBWAY® brand is committed to supporting the highest standards of animal welfare. We support our suppliers' who share our commitment to animal well-being and their practice of the best animal welfare programs based on FDA guidelines, scientific research and the recommendations of animal welfare experts in the industry. We believe that the livestock producers, working with their veterinarian, are in the best position to manage animal health strategies and protocols to accomplish our shared goals.

We provide general information about our animal welfare policy on our company web site and more specific requirements in our product specifications and animal welfare directives.

The SUBWAY® brand has strict purchase specifications with respect to the livestock used for our protein products. We have an animal welfare policy and program directives requiring all our

suppliers to follow the FDA, USDA or country specific animal welfare and handling guidelines. Compliance and verification is done by scheduled and random audits.

Additionally our directives require that our suppliers follow animal welfare guidelines of the nationally recognized governance bodies for each animal species.

Given that FDA regulations specify that “withdrawal time” must be clearly communicated on all approved medicine, our suppliers have protocols in place to ensure that livestock does not enter the food supply until the approved medicine, if administered, has cleared the animals’ system. Our suppliers work closely with trained veterinarians on their staff. To that end, the beef, pork and poultry products served in our restaurants do not contain any antibiotics prohibited by the FDA and do not contain residues above federal mandated levels at the time of slaughter. Our pork, chicken and poultry products are hormone free as mandated by federal regulation but some feed additives, allowed by the FDA to promote growth, are used. Our beef products do not contain any hormones prohibited by the FDA at the time of slaughter and do not contain hormone residuals above FDA mandated tolerance levels.

We are committed to continuing to work with our suppliers to further improve animal welfare practices including the judicious use of antibiotics with hopes of identifying new technologies or practices that could eliminate their use in our product supply over time.

We hope this information has proven useful to you. If you have any questions about the information provided above, please contact us.

Respectfully submitted,

Michele DiNello

Michele DiNello

Director of Corporate Communications

Elizabeth Stewart

Elizabeth Stewart

**Marketing Director/Director of Corporate Social
Responsibility**



June 15, 2012

The Honorable Louise Slaughter
2469 Rayburn House Office Building
Washington, D.C. 50515

Dear Representative Slaughter:

Thank you for your letter dated February 16, 2012 inquiring about the use of antibiotics in the care and raising of livestock and poultry used in the production of retail food items. Target recognizes the importance of this issue and the need for the judicious use of antibiotics in the care and raising of farm animals.

Much of the specific information you requested in your letter is not available to Target. Although the responses to many of your questions would require access to the veterinary medical records maintained by the livestock and poultry farmers and their veterinarians, in an attempt to be responsive we can provide you with the following information.

Target is committed to providing safe, high quality products for our guests. We place great emphasis on sourcing food from industry leaders in food safety and quality and require our vendors to fully comply with all regulatory requirements in the production of food products for our guests. Target looks to the Food and Drug Administration (FDA) and the U.S. Department of Agriculture (USDA) to provide the regulatory standards, requirements and guidance for preventive and therapeutic uses of antibiotics to treat animal diseases. As such, Target supports the recent FDA guidance documents and proposed regulations issued on April 11, 2012.

Target's fresh meat and poultry offerings reflect the products our guests want. Target provides a variety of antibiotic-free meat selections and we routinely review our offerings and guest feedback to ensure we are providing a relevant product selection.

As you explore the use of antibiotics in the care of livestock and poultry, we would respectfully encourage you to engage the leading trade associations representing the food industry, especially those representing the livestock and poultry producers. These associations are best equipped to address your inquiries in a knowledgeable and comprehensive manner.

Thank you for your consideration. I hope this information is useful to you. Please feel free to contact me if you have additional questions.

Sincerely,

A handwritten signature in blue ink that reads "Matt Zabel". The signature is stylized with a large, looped "M" and a long, sweeping underline.

Matt Zabel

Vice President, Government Affairs

Target



Tyson Foods, Inc.
Making Great Food. Making A Difference.™

June 13, 2012

The Honorable Louise M. Slaughter
U.S. House of Representatives
2469 Rayburn House Office Building
Washington, D.C. 20515-3221

Dear Representative Slaughter:

Thank you for your letter. We share the concerns you and a majority of Americans have about food safety. Producing 'trusted food products' is one of Tyson Foods' Core Values and drives our commitment to provide consumers with food that is safe to eat. In fact, our reputation depends on it. Our efforts include ensuring the livestock and poultry we depend on are being raised responsibly, especially since healthy animals mean healthy food products.

As you are well aware, the Food and Drug Administration (FDA) recently has undertaken an initiative to encourage the phase out of the use of certain antibiotics for so-called 'production' purposes, such as to enhance growth or improve feed efficiency in an animal. FDA continues to recognize the importance of using antibiotics to prevent, control or treat illnesses in food-producing animals but only if such uses occur under the supervision of a veterinarian. Tyson Foods took action many years ago to require veterinary oversight of the use of antibiotics in company-owned animals (*chickens and a small percentage of the hogs used in our pork operations*).

We respectfully disagree with the premise of your position on antibiotic use in animal agriculture. According to the American Veterinary Medication Association (AVMA), "*based on available science, the likelihood that human consumption of animal products will lead to an infection with resistant organisms is negligible*"¹ and "*there is little to no evidence that restricting or eliminating the use of antimicrobials in food-producing animals would improve human health or reduce the risk of antimicrobial resistance to humans.*"² The AVMA also notes "*...there are greater restrictions on the use of antimicrobials in animals than there are for use in humans.*"³

¹ http://www.avma.org/public_health/antimicrobial_fact_sheet_veterinarians.pdf

² http://www.avma.org/public_health/antimicrobial_use.pdf

³ http://www.avma.org/public_health/antimicrobial_fact_sheet_veterinarians.pdf

While we do not possess all of the data you requested in your letter, we can tell you the following about our business: We believe our company has a world-class food safety system in place that includes policies and procedures covering all aspects of food production, from animals on the farm to our processing facilities and even in the consumer's home.

Tyson's Food Safety and Quality Assurance team plays a key role in our operations. They include 2,100 food safety and quality professionals serving in key functions at both the corporate and operation level. Working in partnership with our facility management teams and regulatory authorities, they monitor the implementation and effectiveness of our food safety and quality assurance policies, procedures, and controls.

In our vertically-integrated poultry business, Tyson owns the chickens and contracts with family farmers to raise them. The company provides the feed for the chickens and works with the farmers to responsibly maintain flock health through good animal husbandry practices, including the judicious use of pharmaceutical compounds and vaccines to treat and prevent disease. Tyson employs specialized poultry veterinarians to help ensure the proper health and welfare of our birds.

Our poultry operations use only FDA-approved pharmaceutical compounds, which may include antibiotics, administered under the direction of a licensed veterinarian in compliance with FDA protocols. In 2002, we discontinued the use of the fluoroquinolone class of antibiotics, which was later banned by the FDA in 2005. According to the AVMA, many antimicrobials used in human medicine are not approved for use in animals or are, quite simply, too expensive to use in animals.

Tyson Foods does not own any cattle ranches or feedlots. The company does have a small hog breeding operation that represents less than 3% of the company's total pork production needs. Most of the livestock Tyson buys for its beef and pork operations come from independent cattle and hog farmers. The company is actively engaged in working with these farmers and their livestock industry trade groups to make sure antibiotics are used responsibly.

Tyson supports cattle and hog farmer involvement in industry programs that emphasize judicious antibiotic use, including the National Cattlemen's Beef Association Beef Quality Assurance program and the National Pork Board's Quality Assurance Plus program. In addition, the AVMA has developed comprehensive professional guidelines on the judicious therapeutic use of antimicrobials. Tyson's small hog breeding business employs veterinarians to help ensure the proper use of any pharmaceutical products.

It is important to note that due to the cost of animal health products, there is a disincentive for livestock farmers and ranchers to misuse or overuse antibiotics. These products are expensive and the inappropriate use of these drugs provides no economic benefits.

By law, meat sold in the United States is not allowed to contain antibiotic residues that violate FDA standards. When antibiotics are used, our birds are harvested only after FDA-regulated withdrawal times are observed. According to the AVMA, "*when withdrawal times are observed, no antimicrobial residues that can cause harm to people who consume them should be present in milk or meat products.*"⁴ Our cattle and hog suppliers are also expected to comply with the appropriate withdrawal times if antibiotics have been used. The U.S. Department of Agriculture (USDA), which has inspectors in every Tyson plant involved in harvesting chickens, cattle and hogs, routinely conducts random testing on carcasses for drug residues, including antibiotics. If a problem is discovered through this testing, the farmer involved is immediately notified and corrective action is taken.

We believe the farm families who supply us share the values of our company and consumers when it comes to ensuring proper handling of livestock and poultry. This includes careful use of antibiotics. We will continue to work with them and others in our industry to evaluate what is best for the animals we rely on to produce meat and poultry, and the consumers we depend on to buy our products.

Sincerely,



Richard A. Roop, Ph.D.
Senior Vice President
Food Safety and Quality Assurance

⁴ http://www.avma.org/public_health/antimicrobial_fact_sheet_veterinarians.pdf



Wegmans Consumer Affairs

Mary Ellen Burris
Senior Vice President
of Consumer Affairs

May 31, 2012

Louise M. Slaughter
Congress of the United States
28th District,
3120 Federal Building
100 State Street
Rochester, NY 14614

This is our reply to your request for information about antibiotics. The numbers below refer to numbers in the request letter.

1. Current Policies on purchasing meat and poultry produced with antibiotics, and how compliance is assured.

Our policy is to provide A WIDE VARETY of fresh and frozen choices to our customers, including antibiotic-free products for customers who want them and understand why there may be a higher price than for meat from the conventionally raised and treated animals. Organic products are of course produced without antibiotics, and are a very rapidly growing segment.

We maintain purchase specifications and our suppliers' plants are audited to assure ourselves that suppliers are in fact meeting our specifications.

FDA, EPA and USDA jointly administer the National Residue Program, which exists to ensure that veterinary drugs and chemical compounds are used as intended and that the food supply is safe for consumption. In the case of veterinary drugs, FDA sets residue standards and USDA monitors for antimicrobial residues in all meat and poultry products. All meat at retail meets the safety requirements of federal programs and is free from unacceptable levels of residues, whether the antibiotic was administered for disease treatment or disease control.

Along with the food retail industry, our company supports these standards and adheres to the stringent levels set in the products being sold.

2. How do we educate consumers about our purchasing policies re antibiotic use

We try to be transparent about our products' attributes, labeling them clearly, and have on our website a chart of attributes for each of the lines of meat, poultry we carry. In addition, there are periodic columns, blogs, articles in our own MENU magazine etc. to tell our customers what we are doing and why we are doing it.

1500 Brooks Avenue
Box 30844 Rochester, NY 14603-0844
(585) 464-4760 or 1-800-WEGMANS (934-6267)
Fax: (585) 464-4669
maryellen.burris@wegmans.com

Our CHART of Attributes is attached, and as noted above, is on our website:
Wegmans.com.

A chart showing percentages as requested below is attached.

3. Provide percentages of beef, poultry and pork for each category that are produced **without any antibiotics**
4. Percentages that include antibiotic **only for disease treatment**
5. Percentages that include antibiotics **only for treatment and control.**
6. Percentages including **routine use of antibiotics.**

The FDA recently released Guidance 209 *The Judicious Use of Medically Important Antimicrobial Drugs in Food-Producing Animals*. These voluntarily phase out the growth promotion use of seven classes of medically important antibiotics and phase-in veterinary oversight for all medically antibiotics. The retail industry supports FDA's actions to address unnecessary food animal production use of antimicrobials that are important in treating humans and to increase veterinary oversight for the therapeutic uses of such drugs to preserve animal health.

7. Inform us of any planned changes in policy regarding antibiotics.

Our company is committed to helping customers enjoy healthier and better lives. We work with our meat and poultry industry suppliers and government regulators to provide safe, affordable, and nutritious products from healthy animals for our customers every day. We take the safety of our products and animal welfare very seriously and work hard to provide cost effective, safe and nutritious meat and poultry products from healthy animals to our customers, day in and day out.

Respectfully,



Mary Ellen Burris
Senior Vice President of Consumer Affairs

Attachments: Meat and Poultry Attributes; Antibiotic Percentages by Species

cc: Carolyn Shore. Carolyn.shore@mail.house.gov.

Food Marketing Institute, dfikes@fmi.org

Kelly.schoeneck@wegmans.com; mark.spagnola@wegmans.com;

Kathleen.odonnell@wegmans.com; Jeanne.colleluori@wegmans.com; jo.natale@wegmans.com

| | Without any antibiotics | Disease treatment | Disease treatment & control | Routine use of |
|----------------|-------------------------|-------------------|-----------------------------|----------------|
| Beef | 8% | 92% | 0% | 0% |
| | | | | |
| Pork | 4% | 0% | 0% | 96% |
| | | | | |
| Poultry | 4% | 9% | 87% | 0% |

Wegmans meat & poultry defined

Last Updated February 18, 2011

| | No Antibiotics Ever | No Added Hormones (prohibited in US poultry & pork) | No Animal By-products in Feed | No Artificial Solutions Added | No Cages/No Tethering | Free Range | Certified Organic (Receive Organic Feed) | Independent 3rd party Audit/Certification for Animal Care | Other |
|--|---------------------|---|-------------------------------|-------------------------------|-----------------------|------------|--|---|---|
| BEEF | | | | | | | | | |
| Wegmans Beef | | | | ✓ | ✓ | | | American Meat Institute (AMI) | |
| <i>Food You Feel Good About Beef</i> | ✓ | ✓ | ✓ | ✓ | ✓ | | | Humane Farm Animal Care Certified; AMI | Finished in low-density feedlots |
| <i>Organic Food You Feel Good About Beef</i> | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | AMI; USDA National Organic Program (NOP) | No feedlots |
| CHICKEN | | | | | | | | | |
| Wegmans Chicken | | ✓ | | ✓ | ✓ | | | National Chicken Council (NCC) | Beak trimming is not used in the poultry meat industry. |
| <i>Organic Food You Feel Good About Chicken</i> | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | NCC; NOP | Beak trimming is not used in the poultry meat industry. |
| TURKEY | | | | | | | | | |
| <i>Food You Feel Good About Turkey Parts</i> | ✓ | ✓ | ✓ | ✓ | ✓ | | | National Turkey Federation (NTF) | Beak trimming is not used in the poultry meat industry. |
| Wegmans Fresh Young Turkey—Whole and Whole Breasts | | ✓ | | ✓ | ✓ | | | NTF | Beak trimming is not used in the poultry meat industry. |
| Wegmans Fresh Premium Holiday Turkey—Whole | | ✓ | | ✓ | ✓ | | | NTF | Beak trimming is not used in the poultry meat industry. |
| <i>Organic Food You Feel Good About Grand Champion Free-Range Turkey—Whole</i> | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | NOP; NTF | Beak trimming is not used in the poultry meat industry. |
| PORK | | | | | | | | | |
| Wegmans Pork | | ✓ | | ✓ | ✓ | | | Pork Quality Assurance Plus; AMI | |
| <i>Organic Food You Feel Good About Pork</i> | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | Humane Farm Animal Care Certified; NOP | No gestation crates; sows are free to move in farrowing pens. |
| LAMB | | | | | | | | | |
| <i>Food You Feel Good About Lamb</i> | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ | | Australian Meat Industry Nat'l Animal Welfare Standards | |
| VEAL | | | | | | | | | |
| Wegmans Veal | | ✓ | | ✓ | ✓ | | | AMI | Group housed |



JUN 13 2012

Paul E. Carothers

Vice President, Government Affairs

Yum! Brands, Inc.

300 New Jersey Avenue, NW Suite 601

Washington, DC 20001

Tel 202 534 4951

Fax 202 534 4975

Cell 203 606 3393

paul.carothers@yum.com

June 12, 2012

The Honorable Louise M. Slaughter
U.S. House of Representatives
Washington, DC 20515-3221

Dear Representative Slaughter:

I am writing on behalf of Yum! Brands, Inc. and our Taco Bell, Pizza Hut, and KFC business units in response to your letters of February 16, 2012 regarding antibiotic usage in animal agriculture. We appreciate the opportunity to share with you our perspective on this important topic.

Food safety is our top priority and we have very high standards and strict guidelines for our system and suppliers. This commitment is reflected in all aspects of our business, from operations and supply chain management to restaurant food preparation and delivery.

As you note in your letter, scientific authorities have identified the importance of appropriate use of antibiotics in both human and animal medicine as necessary to ensure that effective antimicrobial drugs remain available to treat human diseases. With regard to animal agriculture applications, we look to the expertise of the U.S. Food and Drug Administration (FDA) and the U.S. Department of Agriculture (USDA) as the key authorities with responsibility to define and oversee appropriate standards in this regard.

As a restaurant company, we do not own, raise, or transport animals. Rather, we purchase quality beef, pork and chicken as commodities that we source from many of the same suppliers that regularly provide these products to grocery stores and other restaurants and retailers. Our suppliers and those from which they source products must meet all relevant FDA and USDA food safety standards. Our Supplier Tracking, Assessment and Recognition (STAR) supply chain monitoring systems incorporate supplier compliance with food safety and quality standards. Supplier audits are conducted by STAR-certified third-party auditors.

Among our suppliers, antibiotics are used under veterinary supervision only to cure or prevent disease in accordance with applicable FDA requirements. Our suppliers do not use antibiotics to promote the growth of healthy animals, and compliance is verified through our annual supplier certification process.



The Honorable Louise M. Slaughter

June 12, 2012

Page 2

As you know, in April of this year FDA issued updated guidance regarding antibiotic use in food-producing animals. This guidance is intended to further ensure the judicious use of antibiotics and limit the development of antibiotic resistance. We are working with our suppliers to ensure that these new recommendations are fully reflected in their animal production practices.

I hope you find this information helpful in your work on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul E. Carothers". The signature is fluid and cursive, with a prominent initial "P" and "C".

Paul E. Carothers

June 12, 2012

Honorable Louise Slaughter
Member of Congress
2469 Rayburn House Office Building
Washington, DC 20515

Dear Congresswoman Slaughter:

We are aware of the letters you sent in February to establishments throughout the food chain asking for information regarding their purchasing policies related to antibiotic use in food animals. Although we expect companies will respond to you directly, we would like to provide a scientific perspective on the use of antibiotics in food animals, and the risks and benefits it poses to both animal health and human health.

Antibiotics are stringently regulated and judiciously used

Antibiotics used in veterinary medicine are reviewed and approved by the Food and Drug Administration (FDA or the agency) pursuant to the Federal Food, Drug, and Cosmetic Act (FDCA), the same statute governing the approval of drugs used in human medicine. Drug sponsors must submit data to FDA showing the drug to be effective for treating the target pathogen or condition, safe for use in the intended animal, and sponsors must demonstrate the capability of manufacturing the drug while adhering to Good Manufacturing Practices (GMPs).

For animal antibiotics, the safety assessment is more stringent than that for human antibiotics in three ways:

1) If there are unacceptable risks to humans, FDA will not approve the antibiotic for animals.

While FDA conducts a risk-benefit assessment for human antibiotics, there is no similar consideration of benefits in reviewing antibiotics used in food animals. This means that the risk to human health for products under review must be extremely low because FDA does not consider any benefits to offset the risks.

2) FDA requires a food safety assessment to ensure that meat is safe.

The safety assessment for food animal antibiotics requires sponsors to submit toxicology and food residue studies to ensure that meat derived from animals treated with a certain antibiotic will be safe for human consumption. Data from

these studies are used to establish withdrawal periods, *i.e.*, periods prior to harvest during which antibiotics cannot be used in order to ensure that the final food product is free of residues above established tolerance levels.

3) FDA studies the pharmaceutical thoroughly to guarantee it does not increase the risk of antibiotic resistant bacteria in food. In 2003 FDA implemented Guidance 152, a qualitative risk assessment process that outlines a comprehensive, evidence based approach to preventing antimicrobial resistance that may result from the use of antimicrobial drugs in animals.¹ This process was a priority action item in the U.S. Public Health Action Plan (<http://www.cdc.gov/drugresistance/actionplan/actionPlan.html>).

At the end of the review process, FDA regulates the information sponsors must place on the label. This information includes the dose rate at which the drug is to be used and the efficacy claim allowed to be used. For food animal antibiotics, FDA uses four different label claims:

1. Disease treatment;
2. Disease control;
3. Disease prevention; and
4. Increases average daily weight gain or feed efficiency, which are typically referred to as “growth promotion” claims.

Drugs carrying any of these four claims may be administered to flocks or herds of animals via feed. So, for instance, an antibiotic used at a particular dose rate to treat a disease might be given to animals through the feed. Significantly, off-label or extra-label uses of antibiotics approved for use in feed are strictly prohibited. Veterinarians and producers using antibiotics approved for use in feed must follow the directions for use on the label.

Finally, the FDA regulatory requirements are becoming increasingly strict regarding antibiotics in feed. In April 2012 FDA released Guidance for Industry #209, which states that it is injudicious to use medically important compounds to improve production in food animals. Additionally, Guidance #209 provides that veterinary oversight must be demonstrated for therapeutic use of these same antibiotics. This Guidance in essence carries the weight of regulation and FDA has the authority to implement these provisions. The effect of Guidance #209 is that using medically important antibiotics in food producing animals for growth

promotion purposes will cease and the remaining therapeutic uses will be carried out under the guidance of a licensed veterinarian.

Risks of Antibiotic Use

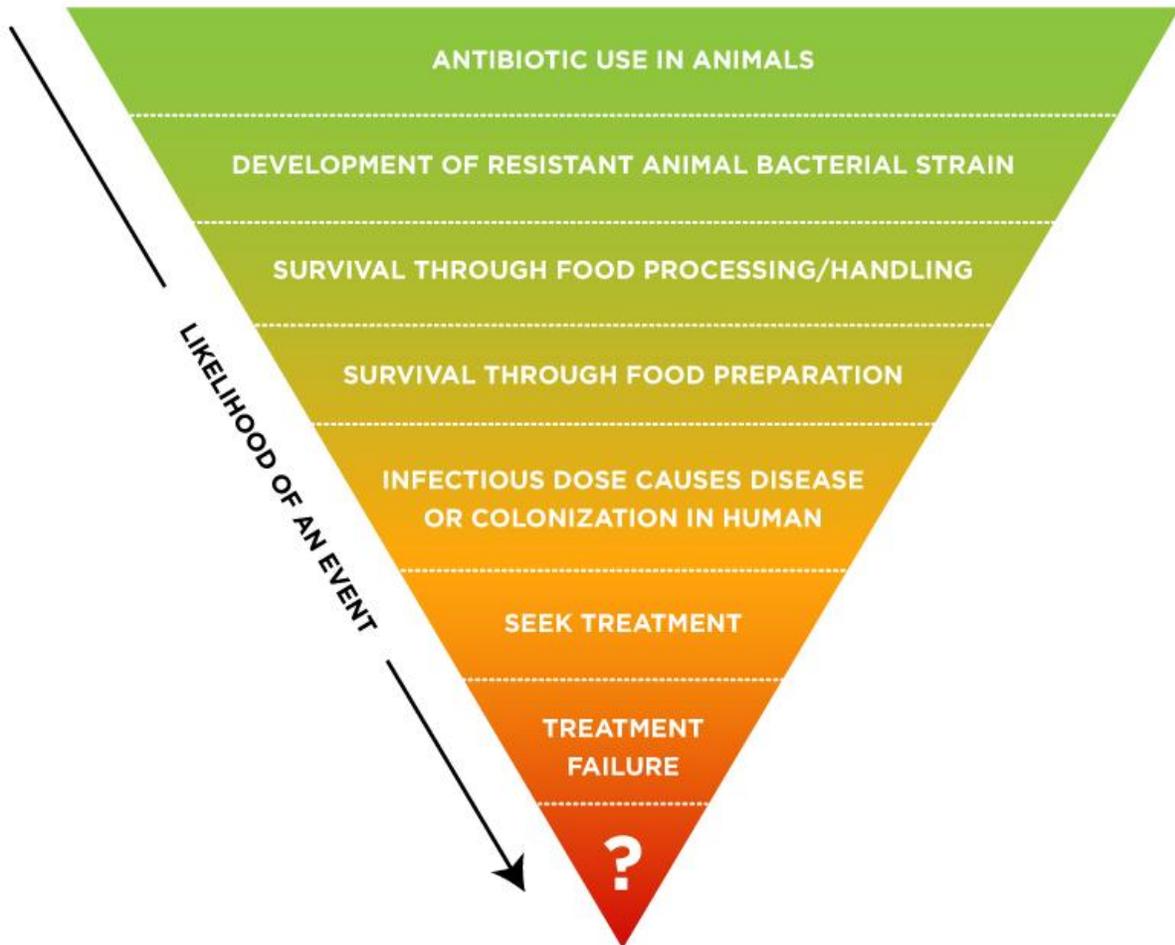
The chart in Figure 1 demonstrates the potential pathway through which antibiotic use in food animals might impact public health. The public policy question is, to what extent does the use of antibiotics in food animals result in the threat of treatment failure when antibiotics are administered to humans?

Risk assessment is the proper tool to answer this question. Several published, peer-reviewed risk assessments have demonstrated that the risk to human health is vanishingly small.

- Assessment of the impact on human health of resistant *Campylobacter jejuni* from fluoroquinolone use in beef cattle. *Anderson SA, et. al., Food Control 2001; 12(1):13-25*. A Georgetown University risk assessment on the use of fluoroquinolones in beef cattle and the resulting human health risk of fluoroquinolone-resistant *Campylobacter* on beef estimated the risk to humans to be 40 additional hospitalizations and 1 case of mortality over the course of 10 years.
- Public Health Consequences of Macrolide Use in Food Animals: A Deterministic Risk Assessment. *Hurd, et. al., Journal of Food Protection, Vol. 67, No. 5, pgs. 980-992*. According to an Iowa State University study, the probability of someone in the U.S. experiencing a treatment failure due to the acquisition of resistant food borne bacteria from eating meat from animals treated with macrolide antibiotics (tylosin, tilmicosin) is less than one in 10 million for resistant *campylobacter*, and less than one in 3 billion for resistant *Enterococcus faecium*. As one of the scientists said; “People would be more likely to die from a bee sting than for their antibiotic treatment to fail because of macrolide-resistant bacteria in meat or poultry.”
- Assessing Potential Human Health Hazards and Benefits from Subtherapeutic Antibiotics in the United States: Tetracyclines as a Case Study. *Cox and Popken, Risk Analysis, 2010*. An assessment of the risk of using tetracycline in food animals concluded that reducing tetracycline use in food animals in the United States should not be expected to cause any improvements in human health or to reduce the risks of tetracycline-resistant infections.

Figure 1

Flow Chart of Antibiotic Resistant Bacteria



- Human health Risk Assessment of Penicillin/Aminopenicillin Resistance in Enterococci Due to Penicillin Use in Food Animals. *Cox, et. al., Risk Analysis, Vol. 29, No. 6, 2009.* A risk assessment of penicillin used in animal feeds concluded that the use of these drugs were unlikely to seriously impact human health from antibiotic-resistant bacteria.

Additionally, FDA's own studies reinforce the results of these and other independently conducted risk assessments. For example, [FDA's risk assessment on the use of Virginiamycin](#), a commonly used antibiotic, found that "assuming a food pathway attribution of 10 percent, the average risk to a random member of the U.S. population of having SREF (streptogramin-resistant *e. faecium*) attributable to animal uses of virginiamycin and that may result in impaired Synercid therapy ranges from 7 chances in 1 billion to 14 chances in 100 million in one year."

Another indication that animal use contributes little, if anything, to the burden of human antibiotic resistance is an examination of the specific resistant bacterial challenges that are the biggest problems in clinical and healthcare settings. The following list is taken from the Infectious Disease Society of America's "Facts About Antibiotic Resistance" and demonstrates the lack of a pathway from antibiotic use in animals to these human resistance challenges.

- **Staphylococcus infections (MRSA)** are mainly hospital nosocomial infections but have been found in communities associated with schools and athletic facilities. These infections are a result of human to human transmission or contact with contaminated materials. IDSA says that 1% of people carry MRSA in their nasal passages. CDC investigates cases of MRSA and has concluded that animal contact is not a risk factor for these infections. Furthermore, CDC also has concluded that MRSA is not a foodborne infection and cannot be acquired by eating meat.
- **Acinetobacter baumannii** is an opportunistic pathogen associated with a high rate of infections in soldiers wounded in Iraq. It is most often associated with wound infections in hospitals and other medical facilities. It is inherently resistant to many antibiotics and has no connection to food animals or antibiotic use in food animals.
- **Vancomycin Resistant Enterococcus (VRE)** is another hospital nosocomial infection that has developed resistance due to extensive use of vancomycin in U.S. hospitals. Vancomycin, or drugs in its class, has never been approved for or used in food producing animals in the U.S.
- **Pseudomonas aeruginosa** is another opportunistic pathogen found in intensive care units that has become resistant to fluoroquinolone antibiotics. It occurs uncommonly in food producing animals where it can cause mastitis in dairy cows. Fluoroquinolones are not approved for use in dairy cows and furthermore Pseudomonas is not a foodborne pathogen.
- **Streptococcus pneumoniae** resistant to several classes of antibiotics is strictly a human pathogen that causes respiratory infections. This organism has no known connection to food producing or companion animals.

- **Neisseria gonorrhoea** is strictly a human pathogen that causes venereal infections transmitted through human sexual contact. Resistance develops because of poor patient compliance with the prescribed course of antibiotic therapy. There is no connection with animals or antibiotic use in animals.
- **Drug resistant tuberculosis, Clostridium difficile, and Klebsiella species** are other bacteria that are mentioned in the IDSA fact sheet. There is no known connection between these pathogens and food producing animals.

Finally, real world experience shows that reducing antibiotic selection pressure in animals has no impact on human resistance levels. In the U.S., for instance, levels of fluoroquinolone-resistant *Campylobacter* have changed little since the use of fluoroquinolones in all poultry was discontinued in 2005, indicating resistance levels in humans are due to selection pressure from something other than use in poultry. Similarly, according to a September 2011 GAO report, Danish officials report that “Denmark’s resistance data have not shown a decrease in antibiotic resistance in humans after implementation of the various Danish policies, except for a few limited examples.” These policies include reducing use by banning the use of antibiotics as growth promoters.

Benefits of Antibiotic Use

While FDA does not consider benefits in the review process for food animal antibiotics, it is important to factor benefits into the public health discussion. Producers and veterinarians take seriously their responsibility for ensuring good animal welfare and antibiotics that are used carefully and judiciously by producers and veterinarians to treat, control, or prevent disease improve animal health and welfare. Animal welfare describes how well an animal is coping with the conditions in which it lives and antibiotics are among the many tools used by producers to provide good welfare to their flocks and herds. Proper housing, management, diet and nutrition, genetics, responsible care, and humane handling are other such tools.

Antibiotic use is also among the several tools used to help enhance food safety. Many steps in meat and poultry processing are designed to eliminate foodborne pathogens. Meat processors seek to reduce incoming pathogen levels from animals and those processors utilize interventions to limit pathogens because it reduces the risk of contamination in the final product. To that end, healthy animals typically have fewer pathogens that need to be removed, which makes other removal steps more effective. Thus, the careful use of antibiotics to keep animals in top health is an important first step in providing the safest possible meat supply. More specifically, a growing body of published research demonstrates that judicious antibiotic use can aid food safety efforts and provided below are citations to research supporting that conclusion.

- Georgia professor Dr. Scott Russell tracked the outcome in the processing plant of birds affected by airsacculitis, a common infection caused by *E. coli*. Presence of the disease increases levels of fecal contamination at the plant and leads to more errors in processing because birds varied in weight, leading to increased levels of *Campylobacter* contamination. According to Dr. Russell, subclinical disease in chickens affects carcass contamination, and subclinical disease can be reduced by antibiotics. (Russell SM. The effect of airsacculitis on bird weights, uniformity, fecal contamination, processing errors, and populations of *Campylobacter* spp. and *Escherichia coli*. *Poult Sci*. 2003 Aug;82 (8): 1326-31)
- Similar research by Dr. Scott Hurd at Iowa State University regarding the presence of carcass lesions, which indicates subclinical disease, was associated with increased levels of *Campylobacter* contamination in swine. (Hurd HS, Brudvig J, Dickson J, Mirceta J, Polovinski M, Mathews N, Griffith R. Swine Health Impact on Carcass Contamination and Human Foodborne Risk. *Public Health Reports*, 2008 May-June Vol 123:343-351.)
- A model constructed by Dr. Randall Singer at the University of Minnesota linking changes in animal illness to possible changes in human foodborne illness observed large increases in human illness days each year as a result of small increases in animal illness levels. “Because the potential human health benefits from continued animal antibiotic use may outweigh the potential increase in human health risks, further clarification of the net human health impact from interventions should be carefully assessed prior to implementation of changes in antibiotic use policy,” wrote the authors. (Singer RS, Cox LA Jr, Dickson JS, Hurd HS, Phillips I, Miller GY. Modeling the relationship between food animal health and human foodborne illness. *Prev Vet Med*. 2007 May 16; 79 (2-40: 186-203.)

All public health professionals, including veterinarians, are serious about reducing the risks of antibiotic resistance. It is vital that public policy decisions about the use of these products be made on the basis of science and risk assessment. The research is clear that the contribution of using antibiotics in food animal production to the human burden of antibiotic resistance is quite small, if it exists at all. We are encouraged by the steps being taken by FDA to extend veterinarian involvement in all uses of antibiotics in food animals and believe FDA’s action will be yet another risk mitigation step to ensure the careful and judicious use of antibiotics in food animals.

We appreciate your interest in this issue and hope we can work with you and your staff in protecting both human and animal health.

Respectfully submitted,

American Farm Bureau Federation
American Feed Industry Association
American Meat Institute
Animal Health Institute
American Veterinary Medical Association
National Cattlemen's Beef Association
National Chicken Council
National Meat Association
National Milk Producers Federation
National Pork Producers Council
National Turkey Federation