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May 14, 2015

Alfred V. Almanza  
Acting Administrator  
Food Safety and Inspection Service  
1400 Independence Avenue SW  
Washington DC 20250

RE: FSIS Petition Number 13-03 (SUPPORT)

Dear Acting Administrator Almanza:

U.S. Public Interest Research Group (U.S. PIRG) is a nonprofit, public interest organization that works to win concrete results for our health and our well-being. Within our public health program, stopping the overuse of antibiotics on livestock and poultry has been and will continue to be a major priority.

We write in support of Petition Number 13-03 (labeling of antibiotic use) and urge USDA to take action on this important consumer and public health issue.

Up to seventy percent of medically-important antibiotics in the U.S. are sold for use on livestock and poultry, and much of this is routinely given to healthy animals. The overuse of antibiotics contributes to the development of antibiotic-resistant bacteria, and we're already seeing the consequences. According to the Centers for Disease Control and Prevention (CDC), every year 2 million Americans get sick and 23,000 die from drug-resistant infections. Additionally, 430,000 drug-resistant illnesses can be pinpointed to foodborne bacteria, which are strongly linked to antibiotic use on animals.

The simplest regulatory solution to the overuse of antibiotics on livestock and poultry, at least in concept, is for the U.S. to adopt a policy to prohibit the use of antibiotics on healthy animals, but past efforts by the Food and Drug Administration and members of Congress have fallen short.

Nonetheless, progress has been seen in the marketplace.

One of the reasons for this progress is that consumers are increasingly aware of the problem. In the past two years, a steady drumbeat of reports by the World Health Organization, CDC, President's Council of Advisors on Science and Technology, and others have elevated the issue. Additionally, advertisements touting meat raised without antibiotics by certain restaurants have raised public consciousness.

A second reason for progress in the marketplace is that major actors in the food industry have been responsive to consumer concerns about the overuse of antibiotics, or have been motivated to be part of

the solution. For example, Perdue Farms, Tyson Foods, and Pilgrim's Pride have all made announcements about ending or reducing antibiotic use in their chickens. Restaurants such as Panera Bread, Chipotle, Shake Shack, Elevation Burger, Carl's Jr., and most recently McDonald's, to name just a few, have made a commitment to serve meat (at least one type of meat, or one menu item) raised without antibiotics.

If the marketplace is to continue making progress, consumers must have sufficient information about antibiotic use. In the case of buying grocery store meats, the information must be available at the point of purchase.

To that end, a simple label, as described in the petition, would inform consumers of whether meat on shelves comes from animals either (a) raised on antibiotics, (b) raised without antibiotics, or (c) given antibiotics only when appropriate such as to treat sick animals or halt a diagnosed infectious disease outbreak.

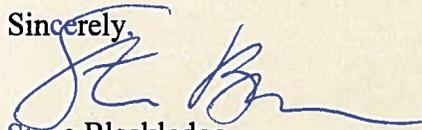
Consumers want this information. A 2014 Consumer Reports poll found that 83% of those polled want the government to label meat when it comes from animals raised on antibiotics.

Enhancing and accelerating the recent progress in the marketplace is needed to truly drive down routine antibiotic use. Despite the aforementioned decisions by some restaurants and meat producers, the latest data from the Animal Drug User Fee Act show that the sales of medically-important antibiotics for use on animals continues to climb, increasing by 20% between 2009 and 2013.

The USDA can and should play a critical role in confronting this public health issue, and we strongly urge you to take action on this petition.

Please contact me at [sblackledge@pirg.org](mailto:sblackledge@pirg.org) or 916-394-5413 if you have any questions.

Sincerely,



Steve Blackledge  
Public Health Program Director