

Dr. Margaret A. Hamburg, Commissioner
U.S. Food and Drug Administration
10903 New Hampshire Ave.
Silver Spring, MD 20993-0002

December 18, 2013

Dear Commissioner Hamburg:

Consumers Union, the public policy and advocacy arm of *Consumer Reports*, is writing to share our concerns about the presence of antibiotic-resistant bacteria in the poultry consumers purchase every day. *Consumer Reports* is releasing an article, “The High Cost of Cheap Chicken,” which will appear in its February 2014 issue, and which includes the results of tests of 316 samples of raw chicken breasts for six different bacteria. Our test results found antibiotic-resistant bacteria in many of the samples tested. While we know that the U.S. Food and Drug Administration (FDA) is taking important steps to address antibiotic resistance in food animals, including the announcement last week of the release of Guidance 213 and the proposed Veterinary Feed Directive, there are additional steps we believe the agency must take to protect the public health.

Our Test Results

Every one of the four major brands we tested (Perdue, Pilgrim’s, Sanderson Farms, and Tyson) as well as store brands contained worrisome amounts of bacteria, even the chicken breasts labeled “no antibiotics” or “organic.” Enterococcus was the most common bacterium we found, occurring in 79.8 percent of our samples. Next was E. coli, in 65.2 percent of them; campylobacter, 43 percent; klebsiella pneumoniae, 13.6 percent; salmonella, 10.8 percent; and staphylococcus aureus, 9.2 percent. Of the 65.2 percent of samples testing positive for E. coli, 17.5 percent of the bugs were “ExPEC” bacteria which are more likely than other E. coli to cause urinary tract infections.

Further, about half of our samples (49.7 percent) tested positive for at least one multidrug-resistant bacterium (resistant to three or more antibiotic classes), and 11.5 percent carried two or more types of multidrug-resistant bacteria. In addition, the bacteria we found were significantly more resistant to classes of antibiotics approved by FDA for chicken production than those not approved for such use, raising legitimate concerns about antibiotic use on the farm and the emergence of resistant bacteria.

Consumers Union’s Recommendations for FDA Policy

FDA’s release last week of Guidance 213 and the proposed Veterinary Feed Directive is a good first step toward addressing the public health crisis of antibiotic resistance. However, Consumers Union believes that there is much more that the agency must do to better protect the public health and to reduce the use of antibiotics in food animals. As you know, antibiotic resistant bacteria in poultry and meat can be a direct problem for people if they consume them and become sick, as it can be more difficult to find a drug that works against the illness. Antibiotic resistant bacteria on farms

also contribute to the proliferation of antibiotic “superbugs” elsewhere, via farm workers, air, manure, feed and water runoff.

The pervasiveness of resistant bacteria, and the presence of multi-drug resistant pathogens in these tests, underlines the urgent need to take further action to reduce use of antibiotics in meat and poultry production. We are concerned that even though Guidance 213 and the proposed Veterinary Feed Directive address the use of antibiotics for growth promotion, that producers will still use antibiotics unnecessarily under the rubric of “disease prevention.” We urge the FDA to prohibit all antibiotic use except for treatment of sick animals.

We also believe that it is important to know which antibiotics are being used on which animals for what purpose. We therefore urge FDA to publish data on what antibiotics are used in food animals, and in what quantities. Such data would help us to assess which antibiotics were having the greatest impact on resistance.

Finally, we understand that as part of the National Antimicrobial Resistance Monitoring System (NARMS) program, information is collected as to whether retail samples were labeled “organic” or otherwise made claims about being “raised without antibiotics.” It would be very helpful for NARMS to publish data in relation to such label claims, so that it could be analyzed.

We appreciate your consideration of our concerns, and hope that these test results are helpful to the agency as it continues its mission of protecting the public health. Should you have any questions about this data or want to discuss it further please feel free to contact us.

Sincerely,



Urvashi Rangan, Ph. D.
Executive Director
Consumer Reports Food Safety and Sustainability Center



Director, Food Policy Initiatives
Consumers Union