



ANTIBIOTICS OFF THE MENU

HOW GLOBAL RESTAURANT CHAINS CAN
HELP TO TACKLE ANTIBIOTIC RESISTANCE



INTRODUCTION

Antibiotic resistance is one of the biggest threats to global health facing us today. Massive overconsumption of existing antibiotics, along with a shortage of new ones, has hastened the emergence of highly resistant bacteria, or ‘superbugs.’ Antibiotic resistant infections are already spreading in all parts of the world. If urgent action is not taken we could face a future where simple cuts and scrapes can once again kill.

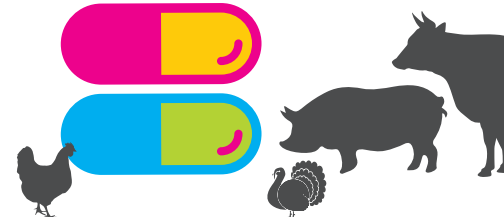
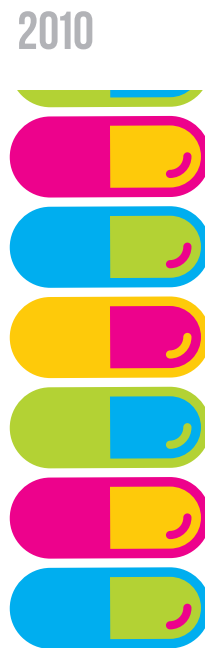
Around half of the antibiotics produced globally are used in agriculture, with much of this being used to make animals grow faster and to prevent rather than treat disease. Despite worldwide concern about the overuse of antibiotics, their use in agriculture is due to increase by two thirds by 2030: from 63,200 tons in 2010, to 105,600 tons in 2030¹. Antibiotic resistant bacteria spread from farms to people through air, soil, water, manure and the consumption of contaminated meat and animal products.

National governments are starting to respond to this impending crisis. The World Health Organization is co-ordinating the international response through its Global Action Plan on Antimicrobial Resistance.

A high level meeting on antimicrobial resistance will take place in New York in September 2016². Along with addressing overconsumption of antibiotics in human medicine and promoting the development of new drugs, changes in farming practices are on the agenda for policy makers everywhere. Government action alone however will not be enough. Business, civil society and consumers will need to play a role. Multinational food businesses with global supply chains are in a position to drive changes faster than legislation alone.

ANTIBIOTIC USE IN AGRICULTURE IS DUE TO INCREASE BY TWO THIRDS BY 2030.

FROM 63,200 TO 105,600 TONS.



The consumer movement has been increasingly vocal on the topic of overuse of antibiotics in agriculture. Consumers International and its members have been calling for international action since 2014³. As public awareness of the health implications of antibiotic resistance grows, consumers are waking up to the dangers posed by the practice of routinely mass administering food animals with antibiotics used in human medicine. In a World Health Organization survey of 12 countries, 73% of respondents agreed that farmers should give fewer antibiotics to animals⁴. There is a strong case for consumer facing businesses like global restaurant chains to take a lead.



CONSUMER GROUPS AND CIVIL SOCIETY CAN PLAY AN IMPORTANT ROLE IN COMBATING ANTIMICROBIAL RESISTANCE. THEY ARE IMPORTANT MOVERS, SHAKERS, AND FRONT-LINE PLAYERS, ESPECIALLY IN THIS AGE OF SOCIAL MEDIA.

CONSUMERS WHO QUESTION THE SAFETY OF FOOD PRODUCED FROM HEAVILY-MEDICATED ANIMALS, AND MAKE PURCHASING DECISIONS ACCORDINGLY, CAN HAVE A PROFOUND IMPACT ON INDUSTRY PRACTICES.

Margaret Chan
Director General of WHO
Speech to the G7, 2015



IN A WORLD HEALTH ORGANIZATION SURVEY OF 12 COUNTRIES



THAT FARMERS SHOULD GIVE FEWER ANTIBIOTICS TO ANIMALS.

WHAT CAN GLOBAL RESTAURANT CHAINS DO?

Multinational restaurant chains are in a strong position to drive a decrease in the agricultural use of antibiotics, faster than legislative change alone. With over 100,000 outlets around the world, McDonald's, Subway and KFC have an influence on supply chains that could be used to great effect.

Restaurant chains should source meat from animals that have been raised without the routine use of antibiotics that are used in human medicine. This must include all antibiotics listed by the World Health Organization as critically important, highly important and important (see Appendix 1). By eliminating non essential uses of antibiotics, and by improving standards in order to prevent the need for antibiotics arising, farmers can help to preserve the effectiveness of essential drugs for humans.

Antibiotics that are used in human medicine should only be used in veterinary medicine to treat sick animals and, on rare occasions, for non-routine disease control if disease has been identified in other close contact animals. Antibiotics that are used in human medicine should never be used for growth, feed efficiency, or for routine disease prevention.

In March 2015, McDonalds announced that chicken served in its US restaurants would be from birds raised without antibiotics important to human medicine within two years⁵. This promise did not extend to its restaurants outside the US, nor to other animal products served in its restaurants. In October 2015, it announced that chicken served in its Canadian restaurants would also be from birds raised without antibiotics important to human medicine⁶.

In October 2015 Subway announced that by the end of 2016 all chicken served in its US restaurants will be from birds raised without antibiotics; and that it will introduce Turkey raised without antibiotics in 2016, with a completed transition expected within 2-3 years; and pork and beef raised without antibiotics by 2025⁷.

A MEANINGFUL GLOBAL COMMITMENT WOULD INCLUDE:

- 1** DEFINING A GLOBAL, TIME-BOUND ACTION PLAN TO PHASE OUT THE ROUTINE USE OF ANTIBIOTICS USED IN HUMAN MEDICINE ACROSS ALL MEAT AND POULTRY SUPPLY CHAINS.
- 2** ADOPTING THIRD-PARTY AUDITING OF THEIR ANTIBIOTICS USE POLICIES AND BENCHMARKING RESULTS SHOWING PROGRESS IN MEETING THE GOAL DESCRIBED ABOVE.



WHAT WE DID

In November 2015 Consumers International (CI) wrote⁸ to the global headquarters McDonald's, Subway and KFC. At the same time 19 CI members wrote letters, some to national or regional headquarters of the three chains and some to other chains. McDonald's, Subway and KFC all responded to our letters.

CI members also received replies from Burger King (Sweden and Germany), Hesburger (Finland), Max (Sweden), Nandos (South Africa), Pizza Hut (Germany), Quick (Belgium) and Vapiano (Germany)⁹.

Our letters called on the chains to make a **global, time-bound** commitment to stop serving meat from animals routinely given antibiotics used in human medicine.

In addition to reviewing responses to our letters, we examined company websites, annual reports and other publicly available information on company policy.

RESTAURANT CHAINS SHOULD SOURCE MEAT FROM ANIMALS THAT HAVE BEEN RAISED WITHOUT THE ROUTINE USE OF ANTIBIOTICS.

GLOBAL CAMPAIGN

CI members that sent letters to companies in November 2015 included:

- Test-Achats (Belgium)
- Kuluttajat-Konsumerterna ry (Finland)
- Union Fédérale des Consommateurs-Que Choisir (France)
- Verbraucherzentrale Bundesverband (VZBV) (Germany)
- Liga del Consumidor (LIDECOM) (Guatemala)
- Hong Kong Consumer Council
- Altroconsumo (Italy)
- Nihon Shohisha Renmei (Japan);
- Consumer Information Network of Kenya (CIN)
- Kenya Consumers Organisation
- Citizen Consumer and Civic Action Group (CAG) (India)
- Consumer NZ (New Zealand)
- Interrepublican Confederation of Consumer Societies (Konfop) (Russia)
- Consumers Korea (South Korea)
- Swedish Consumers' Association
- National Consumer Forum (South Africa)
- Namibia Consumer Trust, Asociación Peruana de Consumidores y Usuarios (Peru)
- Association de Défense des Droits des Consommateurs (Niger).

Following an earlier US based campaign CI members Consumers Union (USA), and Food Animal Concerns Trust (USA) provided advice and support. Additional support was provided by the National Resources Defence Council (USA).



WHY ACTION NEEDS TO BE GLOBAL

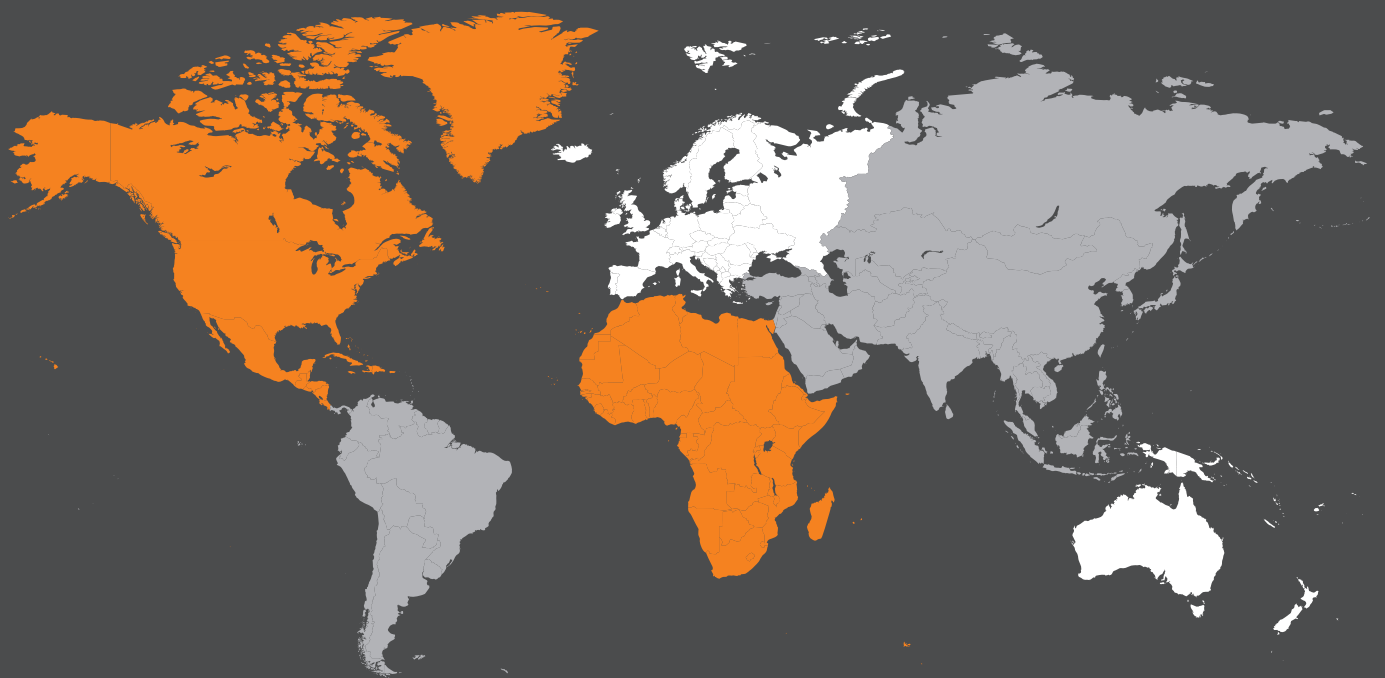
Deaths from antimicrobial resistance (AMR) are predicted to reach the millions by the middle of the century. Antibiotic resistance is the most pressing type of AMR. Antibiotic resistant bacteria travel across national boundaries in myriad ways. Use of antibiotics increases antibiotic resistance. Reducing use of antibiotics in one or two countries does little to address this global crisis.

DEATHS ATTRIBUTABLE TO ANTIMICROBIAL RESISTANCE EVERY YEAR BY 2050

NORTH AMERICA
317,000

EUROPE
390,000

ASIA
4,730,000















LATIN AMERICA
392,000

AFRICA
4,150,000

OCEANIA
22,000

THE GLOBAL COMMITMENTS OF MCDONALD'S, SUBWAY AND KFC

SUMMARY

	MCDONALD'S	SUBWAY	KFC
Number of stores	36,000	44,589	19,420
Number of countries in which they operate	100	111	115
Number of countries in which time bound commitment has been made to end routine use of antibiotics used in human medicine?*	2	1	0
National commitments made to end routine use of antibiotics used in human medicine*	 USA 2017  CANADA 2018	 USA 2016  2019  2025  2025	NONE
Global, time bound commitment to end routine use of antibiotics used in human medicine?*			
Have a publicly available global policy?			
Model chain or failing to make the grade?	COULD TRY HARDER	COULD TRY HARDER	TOTAL WASHOUT

*Including all antibiotics listed as critically important, highly important, or important by the World Health Organization

MCDONALD'S

OWNED BY:

McDonald's Corporation (NYSE: MCD)

CORPORATE HEADQUARTERS:

2111 McDonald's Drive, Oak Brook, IL 60523, USA

CEO:

Stephen J. "Steve" Easterbrook

NUMBER OF LOCATIONS:

36,000

Defined a global, time-bound action plan to phase out the routine use of antibiotics used in human medicine across all of its meat and poultry supply chains?*

No.

Any time bound commitments to phase out the routine use of antibiotics used in human medicine across any of its meat and poultry supply chains?*

In March 2015, McDonald's announced its commitment to stop using antibiotics important to human medicine in chicken production for McDonald's USA by March 2017¹⁰. In October 2015, McDonald's Canada announced that it would only source chicken raised without antibiotics that are important to human medicine by the end of 2018¹¹.

Have a publicly available global policy?

McDonald's published its Global Vision for Antimicrobial Stewardship in Food Animals in March 2015¹². The policy does not include any time bound global commitments but describes a set of goals. One goal is to prohibit the use of antimicrobials defined by the WHO as 'critically important' and not currently approved for veterinary use. It does not extend the prohibition

to antimicrobials defined by WHO as 'highly important' or 'important' and allows the use of critically important antibiotics as long as they were on the market before the policy was released. The policy does include the goal of prohibiting the use of medically important antimicrobials for growth promotion, a practice which is already the law in some places such as the EU and New Zealand. The goal does not extend to other forms of routine use. Another goal is to utilise and to share animal production practices that reduce, and where possible eliminate, the need for antimicrobial therapies and adopt existing best practices.

Response

McDonald's responded to CI's letter. It also responded to CI members in Peru, Russia,

Hong Kong, Finland, Sweden and Belgium. The company referred to its Global Vision for Antimicrobial Stewardship in Food Animals. It did not inform us of any new or imminent time-bound commitments to stop sourcing meat from animals routinely given antibiotics used in human medicine.

Our verdict

McDonald's is the only chain of the three to have a published global policy and has made time bound commitments in two countries. That said, McDonald's should extend its policy within the USA and Canada to cover other meat and poultry besides chicken. It should also extend its commitments to the rest of the world.



*Including all antibiotics listed as critically important, highly important, or important by the World Health Organization

SUBWAY

OWNED BY:

Doctor's Associates, Inc.

CORPORATE HEADQUARTERS:

325 Sub Way, Milford, CT 06461, USA

CEO:

Suzanne Greco

NUMBER OF LOCATIONS:

44,589

Defined a global, time-bound action plan to phase out the routine use of antibiotics used in human medicine across all of its meat and poultry supply chains?*

No.

Any time bound commitments to phase out the routine use of antibiotics used in human medicine across any of its meat and poultry supply chains?*

In October 2015 Subway announced¹³ its intention that its restaurants in the USA will only serve animal proteins that have never been treated with antibiotics. The chain will be serving meals made with chicken raised without antibiotics by the end of 2016. Turkey raised without antibiotics will be introduced in 2016, with a completed transition expected within 2-3 years. Pork and beef raised without antibiotics will follow within six years after that.

Have a publicly available global policy?

No

Response

Subway responded to CI's letter. It also responded to CI members in New Zealand, Russia, Finland, Hong Kong, Sweden, Belgium and Germany. The chain indicated that it hopes to roll out the changes made in the US in New Zealand as soon as possible. It also suggested that it hoped to make similar commitments globally. It did not offer any indication as to when.

Our verdict

Subway's USA policy goes further than that of McDonald's, in that it does not just cover chicken and prohibits all uses of antibiotics, including for treatment and non routine prevention. The chain does not however have a global policy or time-bound commitments in any other country.



*Including all antibiotics listed as critically important, highly important, or important by the World Health Organization



OWNED BY:

Yum! Brands, Inc. (NYSE: YUM)

CEO:

Roger Eaton

CORPORATE HEADQUARTERS:

1441 Gardiner Lane, Louisville, KY 40213, USA

NUMBER OF LOCATIONS:

19,420¹⁴

Defined a global, time-bound action plan to phase out the routine use of antibiotics used in human medicine across all of its meat and poultry supply chains?*

No.

Any time bound commitments to phase out the routine use of antibiotics used in human medicine across any of its meat and poultry supply chains?*

No.

Have a publicly available global policy?

No

Response

KFC responded to CI's letter. It also responded to CI members in Italy, Kenya, Japan, South Africa and Germany. KFC told CI that it follows all local laws and regulations in the countries where it operates. We were not made aware of any commitments or intention to make any commitments to stop selling meat from animals routinely given antibiotics used in human medicine. According to Yum! Brands' US website KFC, Pizza Hut and Taco Bell are committed to sourcing chicken in the U.S. raised without antibiotics that are critically important to human medicine by the end of 2016¹⁵. It does not confirm whether this includes all of the antibiotics defined by the WHO as critically important, and makes no reference to those listed as highly important and important.

KFC Africa told us that its products are antibiotic free at the point of consumption.

Our verdict

KFC trails behind McDonald's and Subway. Its commitment in the US falls well short of what is needed. The argument that it follows local laws and regulations is also insufficient, since many local laws and regulations have not yet caught up with the urgency of the threat of antibiotic resistance. Furthermore, unless companies say otherwise, it is reasonable to expect that not all meat served in restaurants in one country is sourced from that country. The point about products being free from antibiotics or antibiotic residues is irrelevant in this instance, since we are concerned with antibiotic resistant bacteria.



*Including all antibiotics listed as critically important, highly important, or important by the World Health Organization

CONCLUSION AND RECOMMENDATIONS

Given the scale of the public health crisis that we are facing, the lack of commitment from three of the biggest restaurant chains in the world is disappointing. McDonald's and Subway have made some progress but could both do more. KFC lags far behind the other two chains.

Governments around the world are starting to act to try to put the brakes on antibiotic resistance. Global restaurant chains are in a position to use their huge buying power to have real impact on the use of antibiotics in food production, to set the agenda for other businesses and to promote public awareness of this looming crisis.

McDonald's, Subway, KFC and others should make global time-bound commitments to stop serving meat from animals routinely given antibiotics used in human medicine.

MCDONALD'S, SUBWAY, KFC AND OTHERS SHOULD MAKE GLOBAL TIME-BOUND COMMITMENTS TO STOP SERVING MEAT FROM ANIMALS ROUTINELY GIVEN ANTIBIOTICS USED IN HUMAN MEDICINE.



APPENDIX

ANTIMICROBIALS IMPORTANT TO HUMAN MEDICINE LISTED BY THE WORLD HEALTH ORGANIZATION

The World Health Organization maintains a list of Critically Important Antimicrobials for Human Medicine¹⁶. Any drugs listed below should only be used in veterinary medicine to treat sick animals and, on rare occasions, for non-routine disease control if disease has been identified in other close contact animals. Classes of drugs classified as Highest Priority Critically Important Antimicrobials should not be used in veterinary medicine. None of these drugs should ever be used for growth, feed efficiency, or for routine disease prevention.

Critically important antimicrobials

Aminoglycosides
 Carbapenems and other penems
 Cephalosporins (3rd and 4th generation)*
 Cyclic esters
 Flouro- and other quinolones*
 Glycopeptides*
 Glycylcyclines
 Lipopeptides
 Macrolides* and ketolides
 Monobactams
 Oxazolidinones
 Penicillins (natural, aminopenicillins, and antistaphylococcal)
 Polymyxins
 Rifamycins
 Drugs used solely to treat tuberculosis or other mycobacterial diseases
 Designated by the WHO as Highest Priority Critically Important Antimicrobials.

Highly important antimicrobials

Aminopenicillins
 Amphenicols
 Cephalosporins (1st and 2nd generation) and cephamycins
 Lincosamides
 Penicillins (Antistaphylococcal)
 Pleuromutilins
 Pseudomonic acids
 Riminofenazines
 Steroid antibacterials
 Streptogramins
 Sulfonamides, Dihydrofolate reductase inhibitors and combinations
 Sulfones
 Tetracyclines

Important antimicrobials

Aminocyclitols
 Cyclic polypeptides
 Nitrofurantoin
 Nitroimidazoles

References

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- ²World Health Organization, Options, including potential deliverables, for the conduct of a high-level meeting in 2016, in the margins of the United Nations General Assembly http://apps.who.int/gb/ebwha/pdf_files/EB138/B138_24-en.pdf
- ³Consumers International, Recommendations to reduce the use of antibiotics in farm animals, 2014 <http://www.consumersinternational.org/media/1456844/antibiotics-in-farming-ci-recommendations-english.pdf>
- ⁴World Health Organization, Antibiotic Resistance: Multi-Country Public Awareness Survey, 2015 http://apps.who.int/iris/bitstream/10665/194460/1/9789241509817_eng.pdf?ua=1
- ⁵<http://news.mcdonalds.com/US/Media-Statements/Response-to-Antibiotics-in-Chicken>
- ⁶<http://news.mcdonalds.ca/en-CA/news-stories/McDonald-s-Canada-Announces-New-Antibiotics-Policy>
- ⁷<http://www.reuters.com/article/us-usa-subway-antibiotics-idUSKCN0SE2FF20151020>
- ⁸Letters are available at <http://www.consumersinternational.org/news-and-media/news/2015/11/antibiotics-campaign-launch/>
- ⁹Responses are summarised on our WCRD map: <http://www.consumersinternational.org/our-work/wcrd/wcrd-2016/wcrd-2016-map>
- ¹⁰Accessed 2/2/16 at <http://news.mcdonalds.com/US/Media-Statements/Response-to-Antibiotics-in-Chicken>
- ¹¹Accessed 2/2/16 at <http://news.mcdonalds.ca/en-CA/news-stories/McDonald-s-Canada-Announces-New-Antibiotics-Policy>
- ¹²Accessed 2/2/16 at http://www.aboutmcdonalds.com/content/dam/AboutMcDonalds/Sustainability/Antimicrobial_Stewardship_Vision.pdf
- ¹³Accessed 2/2/16 at https://www.subway.com/subwayroot/about_us/PR_Docs/AntibioticFreeRelease10.20.15.pdf
- ¹⁴Accessed 02/02/16 at <http://www.yum.com/investors/restcounts.asp>
- ¹⁵<http://www.yumcsr.com/food/animal-welfare.asp>
- ¹⁶2011; World Health Organization, Critically Important Antimicrobials for Human Medicine, 3rd Revision http://apps.who.int/iris/bitstream/10665/77376/1/9789241504485_eng.pdf



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