

Purchasing Guidelines That Minimize the Use of Antibiotics in Poultry Production



Recommendations for Schools and Other Institutional Food Service Buyers



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Introduction and Rationale

The School Food FOCUS Learning Lab and the Pew Campaign on Human Health and Industrial Farming (HHIF) have developed purchasing guidelines for poultry that reflect the concern FOCUS school districts have about the public health impact of antibiotic overuse in food animal production. This initiative seeks to promote *safe, sustainable, and minimal* use that protects these drugs, which are the world's most important, and most vulnerable, tools for combating infectious disease. It also acknowledges the value of some antibiotic applications, in very limited circumstances, for the treatment of certain illnesses in poultry.

The non-medical use of antibiotics to promote growth and compensate for the effects of overcrowded and unsanitary conditions in livestock production seriously compromises their efficacy in treating human disease. **People who eat meat and poultry and people who do not are equally affected, as drug resistant bacteria can spread beyond animals and animal foods and into produce and the environment.** While any use of antibiotics can potentially contribute to the development of bacterial resistance, the routine use that is common on American farms has clearly hastened the process.¹ Excessive agricultural use has resulted in a perilous situation that, if not soon contained, will profoundly affect the future well-being of today's children. The World Health Organization warns of a "return to the pre-antibiotic era,"² and recognizes non-

therapeutic use on farms as a culprit. Other major health authorities are in strong agreement with this position.³

Antibiotic overuse occurs not just on poultry farms, but throughout the American livestock industry.⁴ FOCUS has singled out poultry as its starting place because of the exceptionally large amount of chicken that its member districts buy. Chicken is the most popular meat protein served in schools, offered daily in many cafeterias across the nation. FOCUS districts will buy tens of millions of pounds of chicken during 2011–12 academic year.

As this project moves forward, it is important to note that the poultry currently served in schools is safe and wholesome. The use of antibiotics in raising poultry does not compromise its nutritional value; and properly cooked chicken and turkey do not spread antibiotic-resistant pathogens. This antibiotics awareness initiative is based on the understanding of the longer-term environmental and public health consequences of inappropriate and excessive drug use. FOCUS, comprised of the nation's leading institutional purchasers of food for children, is in a unique position to catalyze reform. The goal of its collaboration with HHIF is an industry-wide cessation of inappropriate antibiotic use in animal production.

¹ Joint FAO/OIE/WHO Expert Workshop on Non-Human Antimicrobial Usage and Antimicrobial Resistance: Scientific assessment, Geneva, December 1 – 5, 2003; *Appropriate regulation of antibiotics in livestock feed*. R.L. Goforth and C.R. Goforth. Boston College Environmental Affairs Law Review, 2000. 28(1): 39-77; 2004 U.S. Government Accountability Office Report: *Antibiotic Resistance: Federal Agencies Need to Better Focus Efforts to Address Risks to Humans From Antibiotic Use in Animals*

² World Health Organization Fact Sheet No. 194, *Antimicrobial Resistance*, February 2011

³ These include the Centers for Disease Control and Prevention, the Food and Drug Administration, the American Medical Association, the American Academy of Pediatrics, the American Public Health Association, the American College of Preventative Medicine, the Union of Concerned Scientists, Consumers Union, and the Institute of Medicine.

⁴ The amount of antibiotics sold for food animal production in 2009 was 28.7 million pounds, about 80% of the total antibiotics sold in the U.S. that year. (*Summary Report on Antimicrobials Sold or Distributed for Use in Food-Producing Animals*, www.fda.gov/downloads/ForIndustry/UserFees/AnimalDrugUserFeeActADUFA/UCM231851.pdf).

RFP Content Background

The language that HHIF/FOCUS is recommending for use in RFPs is necessarily technical. The following information will help purchasers understand enough of the details to engage credibly and effectively with poultry producers.

“Therapeutic” vs. “Non-Therapeutic” Use

Food-service buyers need to be very clear with producers when they talk about “therapeutic” and “non-therapeutic” applications of antibiotics. These terms are widely used and can mean different things in different contexts. The US Food and Drug Administration (FDA) describes “therapeutic use” broadly, as the treatment, prevention, and control of disease.⁵

The HHIF/FOCUS recommended RFP language defines “therapeutic use” more tightly and more specifically to mean **the use of antibiotics with analogues to human drugs⁶ only under the following circumstances:**

- a) In poultry with diagnosed bacterial disease; or
- b) In healthy poultry if there is a medical reason, determined and documented by a licensed veterinarian, to believe that the birds are at significant risk for developing a clinical bacterial infection (prophylaxis).

HHIF/FOCUS refer to any non-medical use of antibiotics (e.g., for growth promotion or given in the absence of disease) with analogues to human drugs as “non-therapeutic.”

General Guidelines and Explicit Restrictions

The HHIF/FOCUS guidelines for antibiotic use in poultry are based on the following “judicious use” practices proposed by the FDA:

- Emphasis on sound preventive programs, including vaccination and blood testing;

⁵ www.fda.gov/downloads/AnimalVeterinary/SafetyHealth/AntimicrobialResistance/JudiciousUseofAntimicrobials/UCM095590.pdf

⁶ “Antibiotics with analogues to human drugs” refer to veterinary antibiotics that are the same as or very closely related to drugs used in human medicine.

⁷ For instance, antibiotics excreted into manure are not released into the environment until there has been adequate time allowed for them to break down. This can take hours, days, or months, depending on the drug in question.

⁸ The permitted veterinary drugs listed in the RFP have no relationship to human drugs and have no use in treating human disease. At this time they are the only drugs with no analogues in human medicine that are approved for use by the FDA and currently used by poultry producers.

- Documented need for antibiotics and demonstration that no viable alternative exists;
- Veterinarians consulted prior to use of antibiotics;
- Records kept of treatment and outcome;
- Treatment for grouped animals is done at barn/house level. Animals in adjacent housing should not be treated if not exposed;
- Environmental contamination is minimized.⁷

HHIF/FOCUS have tightened the above guidelines as follows:

- a) A written veterinary report to the purchaser is required whenever antibiotics are used for prophylaxis for more than two consecutive growing cycles. This report must describe the underlying problem(s) and outline a plan of action to correct it if not already resolved.
- b) Growers will maintain records of all feed and water additives for each growing cycle.

These two amendments to FDA guidelines *explicitly* restrict antibiotic use on the farm. **Producers that adhere to the HHIF/FOCUS guidelines will not be in a position to use antibiotics with analogues in human medicine routinely or without clear medical justification.**

Veterinary antibiotics that do not have analogues in human medicine are not regulated, as their use apparently presents minimal risk to public health. The recommended RFP text is clear about which drugs are in this category.⁸

Assurance of Compliance

How does a purchaser know if the poultry grower is in compliance with the terms spelled out in the RFP and subsequent contract? An open and trusting relationship may be sufficient—a good producer will regard this as critical for sustaining success over the long term. But the purchaser should always reserve the right to employ a third-party certifier, with the terms of that right made clear in the contract. The “antibiotics aware” agreement between purchaser and poultry supplier that HHIF and FOCUS are proposing is complicated enough to call for, at the very least, the ready availability of verification.

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Recommended RFP text

The following language can be incorporated into a school district RFP for poultry purchase:

Use of antibiotics on the farm, if practiced, must be minimal. Use of drugs with analogues in human medicine must be non-routine and rare.

Restrictions on antibiotic use

1. No administration of antibiotics pre-hatch.
2. Antibiotics with analogues in human medicine can only be used therapeutically. Drug classes that fall in category include:
 - Tetracyclines (Chlortetracycline, Oxytetracycline)
 - Penicillin (Penicillin G procaine)
 - Macrolides (Tylosin, Erythromycin, Tilmicosin, Oleandomycin)
 - Lincosamides (Lincomycin)
 - Streptogramins (Virginiamycin)
 - Aminoglycosides (Spectinomycin, Neomycin)
 - Sulfonamides (Sulfanitran, Sulfadimethoxine, Sulfamethazine, Sulfaquinoxaline, Sulfathiazole)

“**Therapeutic use**” is defined as follows:

- The use of antibiotics with analogues to human drugs in poultry diagnosed with bacterial disease; or
 - The use of antibiotics with analogues to human drugs in healthy poultry if there is a medical reason, determined and documented by a licensed veterinarian, to believe that the birds are at significantly increased risk for developing a clinical bacterial infection or after an exposure to infectious bacteria but before the onset of clinical signs or laboratory confirmed disease (prophylaxis)
3. If antibiotics with analogues to human drugs are used for prophylaxis for more than two consecutive growing cycles, there must be a written veterinary statement indicating the

underlying problem(s) and a plan of action to correct the problem(s). If the underlying problem has been resolved, the veterinary statement may indicate that a successful solution has been found that does not include the prophylactic use of antibiotics, and that no further plan of action is needed. Veterinary documentation of treatment and outcomes must include culture and sensitivity reports.

4. Non-therapeutic use of antibiotics with analogues in human medicine is disallowed. “Non therapeutic use” is defined as use in the absence of microbial disease, known (documented) disease exposure, or a medical reason to believe there is a significant risk for developing a clinical bacterial infection. Non-therapeutic use includes administration of antibiotics for growth promotion, feed efficiency, weight gain, or in the absence of documented exposure.
5. Use of drugs with no analogues in human medicine—aminocoumarins, glycolipids, ionophores, and quinoxalines—is not disallowed.

Required management principles

- Emphasis on sound preventive programs, including vaccination and serologic monitoring for disease exposure;
- Treatment for grouped animals is done at barn/house level. Animals in adjacent housing should not be treated if not exposed; and
- Environmental contamination is minimized.

Assurance of compliance

[Purchaser] reserves the right to use a third-party certifier to verify that the producer is in compliance with the above restrictions and requirements.