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Illness

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Scientists

Waterkeeper Alliance

October 4, 2012

Bob Langert, Vice President  
Corporate Social Responsibility  
McDonald's Corporation  
2111 Midwest Rd  
Oak Brook, IL 60523

Dear Mr. Langert,

We are writing you as core members of Keep Antibiotics Working (KAW), a coalition representing more than 11 million supporters concerned about the health impacts of the overuse of antibiotics in livestock and poultry production. We are interested in finding market and policy approaches to reducing that overuse.

Several of us remember interacting with you prior to the issuance of the 2005 McDonald's policy on antibiotic use in concert with the Environmental Defense Fund.

Given McDonald's previous leadership on this issue, and your continued status as a large purchaser of beef, pork and poultry products, we are writing to explore potential opportunities to work with you to further improve McDonald's policies and practices to keep pace with recent science and movement in the marketplace. The 2005 policy specifically stated that McDonald's would periodically update its policies.

We request a meeting with you at your Chicago-based headquarters in Oak Brook to discuss these opportunities in more detail, at your convenience. In particular, we are interested in exploring some of the following questions:

- 1) When was the last time the 2005 McDonald's antibiotics policy was updated? What changes were made?
- 2) Is McDonald's interested in updating its existing policy?

In particular, would McDonald's be interested in partnering with KAW to update its policy with respect to pork production? It is our understanding that the policy has so far only been applied to chicken suppliers because McDonald's only has a "direct relationship" in the meat purchasing supply chain process for poultry, and not other animal products.

- 3) Given the FDA's draft Guidance documents<sup>1</sup>, which are not requirements, we believe McDonald's policy – which is forward looking – should be amended to refer to both regulatory requirements *and* guidance for industry.
- 4) Subsequent to 2005, it has become clear that cephalosporins and gentamicin are routinely used extralabel through injections to eggs destined to become broiler chickens. FDA has issued a ban on extralabel use of cephalosporins in most applications. While McDonald's current policy would seem to preclude cephalosporin use, it is unclear whether it would also preclude extralabel use of gentamicin and other medically important antibiotics.

Please contact Lisa Isenhart, KAW Coalition Manager, at [lisenhart@keepantibioticsworking.com](mailto:lisenhart@keepantibioticsworking.com) or 773-525-4952 to determine a time when representatives of KAW could meet with you to discuss the above questions. We thank you for your consideration and look forward to hearing from you soon.

Sincerely,

Cindy Roberts  
Research Associate, Food Safety  
Center for Science in the Public Interest

Steven Roach  
Public Health Program Director  
Food Animal Concerns Trust

Lisa Isenhart  
Coalition Manager  
Keep Antibiotics Working

David Wallinga, MD  
Senior Advisor in Science, Food and Health  
Institute for Agriculture and Trade Policy

Jonathan Kaplan  
Senior Policy Specialist  
Natural Resources Defense Council

Susan Vaughn Grooters, MPH  
Director of Research and Education  
STOP Foodborne Illness

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<sup>1</sup> FDA Draft Guidance #213 available here:  
<http://www.fda.gov/downloads/AnimalVeterinary/GuidanceComplianceEnforcement/GuidanceforIndustry/UCM299624.pdf>

