DOUBLE STANDARDS

ANTIBIOTIC MISUSE BY FAST FOOD COMPANIES

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What is this study about?

- An assessment of fast food companies in India w.r.t. eliminating misuse of antibiotics from meat supply chain in view of antibiotic resistance
  - Focuses on policies and plans of fast food multinationals for India in comparison to developed parts of the world
  - Based on CSE’s correspondence with fast food companies in India (apart from information in public domain)

Antimicrobial resistance (AMR) – antibiotic resistance (ABR) in particular – is a global public health threat of an unprecedented scale!

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Why this assessment?

• Besides in humans, **antibiotic misuse in animals accelerates AMR** (animal contribution possibly higher due to more antibiotic consumption)

• **Intensive food-animal production** involves **extensive misuse of antibiotics** for commercial gains; routine non-therapeutic use for:
  
  – Growth promotion (e.g. fattening chicken in less time with less feed)
  
  – Disease prevention (given to large groups; even in absence of disease)

• Fast food industry, typically **sources meat from such intensive farms**

• Fast food industry, therefore is likely **a big contributor to rising AMR**

• In response to the growing pressure from regulators and other stakeholders, the industry has owned up to the problem and is **acting responsibly in developed parts of the world**

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**Status in India? – in the backdrop of rising AMR; and growing fast food industry which is fuelling greater consumption and production of chicken**
How AMR impacts us?

- AMR arise when bacteria survive exposure to an antibiotic that would normally kill them or stop their growth.

- More and more antibiotics are becoming ineffective to treat infections caused by different bacteria; No new class of antibiotics have been discovered since 1980s.

- AMR can cause huge health and economic impact on individuals and nations:
  - Greater spread of infectious diseases
  - Difficulty in treating common infections
  - Uncertainty in success of high-end procedures
  - Longer hospital stays and more expensive treatments

- It can also impact food safety, nutrition security, livelihood, growth and attainment of Sustainable Development Goals.

By 2050, AMR is estimated to lead to 10 million deaths and lost output worth US$ 100 trillion globally – post-antibiotics world.

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Huge global momentum to address AMR and animal part of the problem

- **2015:** Global Action Plan on AMR led by the tripartite — World Health Organization (WHO), Food and Agricultural Organization of the United Nations (FAO) and World Organization for Animal Health (OIE)

- **2016:** AMR received **global political support at United Nations General Assembly.** Fourth health issue after HIV, NCDs, Ebola to be discussed at that level. Interagency Coordination Group involving UN organizations established

- **2017:** Several countries submitted National Action Plans at the World Health Assembly. **Indian Plan released in April 2017 along with Delhi Declaration**

- **2017:** WHO releases ‘**Guidelines on the Use of Medically Important Antimicrobials in Food-producing Animals**’ aimed at preserving antibiotics for human use; recommends complete restriction on non-therapeutic use

- ‘**World Antibiotic Awareness Week**’ every year; In 2017, its from **Nov 13-19**

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Action to contain antibiotic misuse in food-animals is integral across global and national plans and guidelines; all stakeholders – governments, industry, inter-governmental organisations, civil society are committing to act!

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CSE’s contribution to the understanding of antibiotic use and AMR in food-animal sector of developing countries
CSE’s Assessment – Antibiotic misuse by fast food companies
Scope: popular fast food brands in India

<table>
<thead>
<tr>
<th>11 leading multinational fast food brands</th>
<th>Three Indian fast food brands</th>
</tr>
</thead>
<tbody>
<tr>
<td>McDonald’s</td>
<td>Subway</td>
</tr>
<tr>
<td>Domino’s</td>
<td>KFC</td>
</tr>
<tr>
<td>Dunkin’ Donuts</td>
<td>Starbucks</td>
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<tr>
<td>Wendy’s</td>
<td>Chili’s</td>
</tr>
<tr>
<td>Cafe Coffee Day</td>
<td>Nirulas</td>
</tr>
</tbody>
</table>

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Objective: To know about India-specific policy and plans for antibiotic use in meat supply chain

- CSE wrote to companies and sought response to queries:

CSE queries

- Does your organization have any policy for use or sourcing of fish and meat such as chicken, raised using antibiotics, for your food products? If yes, please share the details
- If there is no policy initiative then what is the plan in future?
- What is the policy of your organization to test for the presence of resistant bacteria and antibiotic residues in meat or fish products sold at your outlets?
### Response summary

<table>
<thead>
<tr>
<th>Response not received (8/14 brands)</th>
<th>Response received (6/14 brands)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MNC brands (7/11)</strong></td>
<td><strong>MNC brands (4/11)</strong></td>
</tr>
<tr>
<td>1. McDonald’s</td>
<td>1. Subway</td>
</tr>
<tr>
<td>2. Pizza Hut</td>
<td>2. Domino’s Pizza</td>
</tr>
<tr>
<td>3. KFC</td>
<td>3. Dunkin’ Donuts</td>
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<tr>
<td>4. Taco Bell</td>
<td>4. Burger King</td>
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<tr>
<td>5. Chili’s Grill &amp; Bar</td>
<td></td>
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<tr>
<td>6. Starbucks</td>
<td><strong>Indian brands (2/3)</strong></td>
</tr>
<tr>
<td>7. Wendy’s</td>
<td>5. Café Coffee Day</td>
</tr>
<tr>
<td><strong>Indian brand (1/3)</strong></td>
<td>6. Barista</td>
</tr>
<tr>
<td>8. Nirula’s</td>
<td></td>
</tr>
</tbody>
</table>

Most foreign multinationals did not even choose to respond!
What CSE found?

‘DOUBLE STANDARDS’
by foreign (US-based) fast food MNCs
Fast food multinationals have committed to eliminate antibiotic misuse in chicken supply chain in the US and European countries

- These commitments are aggressive, specific and time-bound; most companies have an over-arching global policy that recognises the need to limit antibiotic misuse to contain rising AMR.

- Most companies aimed to completely stop using medically important antibiotics – identified and categorised by the WHO into important, highly important and critically important antimicrobials (CIAs); Few have planned to eliminate only routine use i.e. non-therapeutic use for growth promotion and/or disease prevention; One (Dunkin’ Donuts) has even committed for no antibiotic use ever.

- Many companies have fulfilled their promise by now and several others will do by 2018 in the US.

- One (McDonald’s) has also committed to stop using ‘highest priority critically important antibiotics’ in the US and several European countries.

- These commitments are publically available, include third-party audits.

No such commitments are made for India by these global giants!
McDonald’s
(Connaught Plaza Restaurants Pvt. Ltd.; Hardcastle Restaurants Pvt. Ltd.)

Global
- **Eliminated use of** *antibiotics important to human medicine*
  - 2016: US
- **Eliminate use of** *highest priority CIAs*
  - Jan 2018: Brazil, Canada, Japan, S. Korea, US, Europe
  - 2019-end: Australia, Russia, Europe (including colistin)
  - Jan 2027: China
- *Global Vision for Antimicrobial Stewardship in Food Animals*
  - Aims to source meat with no *growth promoter* and *routine prevention use* as well as with no use of *Highest Priority CIAs*

India
- **No commitment** to reduce or eliminate any kind of antibiotic use

**300 outlets** in India
**12/27 non-veg dishes**
**9 chicken, 3 fish or sausage**

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Pizza Hut, KFC, Taco Bell
(Yum! Restaurants India Pvt. Ltd.)

Global

- Eliminate use of antibiotics important to human medicine in US
  - Mar 2017: Pizza Hut
  - 2018-end: KFC
  - Q1 2017: Taco Bell
- Good Antimicrobial Stewardship Programme
  - Mentions efforts to eliminate antibiotic use for growth promotion even where permitted by law

India

- No commitment to reduce or eliminate any kind of antibiotic use

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Starbucks
(TATA Starbucks Pvt. Ltd.)

Global

• Eliminate **routine use** of **medically important antibiotics**
  – 2020: US
• Commitment part of **animal welfare practices**

India

• **No commitment** to reduce or eliminate any kind of antibiotic use

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<table>
<thead>
<tr>
<th>Global</th>
<th>India</th>
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<tbody>
<tr>
<td>• Eliminate use of <strong>medically important antibiotics</strong></td>
<td>• <strong>No commitment</strong> to reduce or eliminate any kind of antibiotic use</td>
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<tr>
<td>– 2017: US</td>
<td></td>
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<tr>
<td>• Commitment part of Wendy’s <em>Antibiotic Use Policy Guidelines</em></td>
<td></td>
</tr>
</tbody>
</table>

Centre for Science and Environment
<table>
<thead>
<tr>
<th>Global</th>
<th>India</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Supports USFDA’s action to eliminate the use of medically important antibiotics for growth promotion and feed conversion</td>
<td>• <strong>No commitment</strong> to reduce or eliminate any kind of antibiotic use</td>
</tr>
</tbody>
</table>

**Chili’s Grill & Bar**  
(TexMex Cuisine India Pvt. Ltd.)

- 10 outlets in India
- 53/85 non-veg dishes
- **33 chicken**: 10 (beef, salmon, pork, shrimp), rest others

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Global

- Eliminated the use of medically important antibiotics for growth promotion
  - 2016: US

India

Response (excerpts/summary)

- Global policy on use of antibiotics to treat, control and prevent disease, but may not be for growth promotion
- Possible transition plans from US for each region, including India
- Raw chicken and lamb meat tested for antibiotic residues; wild-tuna raised without antibiotics
- Third party audits conducted for compliance of food safety and quality protocols and expected practices.
- Would share details on their future plans in 2018

Gaps

- No specific time-bound commitment to reduce/eliminate antibiotics
- Focus only on reducing growth promoter use and not prophylactic use
- No test and audit reports shared

Responded

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Domino’s Pizza
Dunkin’ Donuts
(Jubilant FoodWorks Ltd.)

Domino’s Pizza
• Eliminate use of antibiotics important for human health
  – 2018-beginning: US

Dunkin’ Donuts
• Commitment to use chicken raised with no antibiotics ever
  – 2018-end: US

Response (excerpts/summary)
• Global standards, food safety and quality systems stringently followed
• Chicken bought from farms which use antibiotics for health management and follow withdrawal period
• Regular certifications from processors and factory audits
• Chicken products checked for antibiotic residues and microbial compliances; no residues/resistant bacteria found

Gaps
• No specific time-bound commitment made to reduce/eliminate antibiotics
• ‘Health management’ does not clarify antibiotic use allowed/not allowed
• Tests reports shared largely for antibiotic residues only (not for resistant bacteria). Audit reports not shared

Responded
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Global

• Eliminate use of antibiotics important to human medicine in the
  – 2018-end: US and Canada

Responded

Indian

Response (excerpts/summary)

• Recognize antibiotics to play an important role in animal wellbeing and human health
• Hold suppliers to very high standards, including audits to meet food safety requirements
• Gave reference to global website for commitments made

Gaps

• No specific time-bound commitment made to reduce/eliminate antibiotics
• No reports of tests and audits shared
What CSE found?

Indian fast food brands also need to replicate global best practices
Indian scenario

- **No commitment** to reduce or eliminate any kind of antibiotic use
Indian scenario

Response (excerpts/summary)

• Follow all FSSAI norms
• Vendors source chicken meat from suppliers who follow food safety measures, veterinary care program and biosecurity measures
• Poultry meat and finished products are tested for antibiotic residues from NABL-accredited and FSSAI-approved laboratory
• Confirmation of withdrawal period for antibiotic residues through ‘Health certificate’ by suppliers; no antibiotic residue detected in the poultry meat

Gaps

• No specific time-bound commitment made to reduce/eliminate antibiotics
• No test or audit reports shared
• No FSSAI standards for antibiotic residues in chicken exist as on date

Responded

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Indian scenario

Response (excerpts/summary)

- Response from Vendor 1: Suppliers ensure antibiotic free chicken/mutton and meat derivatives; tested by veterinary doctor
- Response from Vendor 2: Suppliers are approved, there are no antibiotic residues in final product and vendors have traceability system up to the farm level

Gaps

- No specific time-bound commitment made to reduce/eliminate antibiotics
- No test or audit reports shared

Responded

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CSE recommendations
• Indian fast food industry is uniquely positioned to effect a substantial reduction in antibiotic use in food-animal production

• Besides a social responsibility, there is also strong business case for them to sell food without antibiotic use

• Foreign multinational companies know how to do it and must take the lead
Fast food companies must make aggressive, time-bound India-specific commitments

- The commitments must aim to **eliminate** all **non-therapeutic antibiotic use** – growth promotion and disease prevention – and clearly indicate by when the company plans to eliminate such misuse.

- They must also commit to stop any use of critically important antibiotics.

- The commitments should aim to include **products from all food animals** (chicken, lamb, fish etc.) relevant to a company and specify accordingly.

- **Third-party supply chain audits, laboratory testing** for antibiotic residues and resistant bacteria and **documentation of antibiotic use** should be made an integral part of the process.

- The **commitments** and **reports** of audit, compliance and testing should be put up in **public domain**. Information on AMR and antibiotic use should also feed-into the **national-level surveillance databases**.

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Policy makers must also undertake steps to address the issue of antibiotic misuse in food-animals

- Use of antibiotics as growth promoters and for disease prevention must be prohibited. The departments of animal husbandry, dairying and fisheries at the Centre and States must ensure this through appropriate regulations and enforcement.

- FSSAI must develop standards for antibiotic residues and resistant bacteria for food from animals, conduct periodic surveillance and make it public.

- FSSAI should also develop labelling laws, making the consumer aware about use of antibiotics in rearing food animals. It should aim to eliminate routine non-therapeutic antibiotic use from the entire food chain, beginning with fast food sold at restaurants. Such an initiative could be an incentive for a company to make and fulfill its commitment to eliminate antibiotic use.
Food-animal producers and big institutional buyers should develop and support commitments

- Producers of food-animals like such as of poultry and fish, who supply to the fast food companies are typically big and few. These should also pro-actively support the commitments made and adopt practices which reduce dependence on antibiotics

- Big institutional buyers such as hotels, hospitals, airlines and railways should also work towards developing similar policies and commitments of sourcing food from animals
Annexure
### WHO list of important antimicrobial classes (5th revision, 2017)

<table>
<thead>
<tr>
<th>Category</th>
<th>Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highest Priority Critically Important Antimicrobials (HPCIA)</td>
<td>Cephalosporins (3rd, 4th, 5th generation), Glycopeptides, Macrolides and ketolides, Polymyxins, Quinolones</td>
</tr>
<tr>
<td>High Priority Critically Important Antimicrobials</td>
<td>Aminoglycosides, Ansamycins, Carbapenems and other penems, Glycylcyclines, Lipopeptides, Monobactams, Oxazolidinones, Penicillins (natural, aminopenicillins and antipseudomonal), Phosphonic acid derivatives, Drugs used solely to treat tuberculosis or other mycobacterial diseases</td>
</tr>
<tr>
<td>Highly Important Antimicrobials</td>
<td>Amidinopenicillins, Amphenicols, Cephalosporins (1st and 2nd generation) and cephamycins, Lincosamides, Penicillins (anti-staphylococcal), Pseudomonicacids, Riminofenazines, Steroid antibacterials, Streptogramins, Sulfonamides, Dihydrofolatereductase inhibitors and combinations, Sulfofones, Tetracyclines</td>
</tr>
<tr>
<td>Important Antimicrobials</td>
<td>Aminocyclitols, Cyclic polypeptides, Nitrofurazones and Nitroimidazoles, Pleuromutilins</td>
</tr>
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