

From: [Tim James](#)
To: [Sheehy, Jeff \(BOS\)](#)
Cc: [Carroll, John \(BOS\)](#); [Barnes, Bill \(BOS\)](#)
Subject: Antibiotic Use in Food Animals
Date: Wednesday, September 27, 2017 8:14:13 AM
Attachments: [San Francisco Antibiotics LTR - 9-27-17.pdf](#)

Supervisor, please accept the attached letter regarding antibiotic use in food animals. Thank you for your consideration and please contact me with any questions or for additional information. Thank you, Tim

Timothy James
Sr. Manager, Local Government Relations and Regulatory Affairs
California Grocers Association
916-448-3545

September 27, 2017

The Honorable Jeff Sheehy
San Francisco City Hall
1 Dr. Carlton B. Goodlett Place, Rm. 244
San Francisco, CA 94102



RE: Antibiotic Use in Food Animals

Dear Supervisor Sheehy,

On behalf of the California Grocers Association, I write to share concerns and ask for additional consideration in specific areas of the proposed language. As primary food and household goods providers for San Franciscans, grocers take our responsibility seriously to provide products in a safe manner. We look forward to working with our federal, state and local partners to ensure the highest level of safety for our consumers. However, this proposal is focused on the production of meat products and treatment of animals while under the control of producers and is not about the safety of products while in grocers control. We believe the spirit and language of the policy must reflect this dynamic.

San Francisco is a recognized leader on many health, safety and environmental issues. Of note is the work on pharmaceutical take back, which requires producers of medications to work directly with the city on product concerns. The Pharmaceutical Take Back Ordinance is a classic example of Extended Producer Responsibility (EPR), which is dealing directly with entities responsible for a products impact. We believe the city should continue its leadership in regards to EPR with this issue and work directly with producers who control antibiotic use, instead of taking the more difficult route of simply regulating grocers. Unfortunately, this ordinance is determined to hold grocers' responsible for information for which they have no control over and is more easily retrieved by the city directly from producers.

It is important to recognize grocers and other food retailers do not already possess the level of information regarding the use of antibiotics required by the ordinance. The information requested could also not be compelled by the retailer from the producer, nor could the accuracy be directly verified by the retailer. Instead of patching together a complicated regulatory scheme which will be hoisted on retailers without control over antibiotic use or without access to antibiotic use information, we encourage the city compel the information directly from the producers. We believe the Department of Environment has the proven ability to work with producers directly which will ensure accurate and verifiable information regarding antibiotic use.

Specific to the ordinance language currently proposed we have some concerns. This ordinance regulates grocers in an aggressive manner, while simultaneously asking food retailers to be the city's partner. Unfortunately, several sections of this ordinance appear to overly regulate retailers and does not provide necessary protections for grocers, who are being used by the city as a middle-man. Areas of the ordinance which need adjustments include use of the information provided by grocers by the Department of Environment, depth of information required to be provided by retailers, retention of documentation received by grocers from producers and, most importantly, providing retailers liability protection while providing information for which they have no control or ability to compel. We believe these adjustments need to be addressed before the ordinance is finalized.

Thank you for your consideration and we look forward to additional conversation and appreciate the opportunity to address the issues raised.

Sincerely,


TIMOTHY M. JAMES
Sr. Manager, Local Government Relations

cc: City Clerk, City of San Francisco