

From: [Mark Dopp](#)
To: [Carroll, John \(BOS\)](#)
Cc: [Somera, Alisa \(BOS\)](#); [Board of Supervisors, \(BOS\)](#); [Pete Thomson](#); [Janet Riley](#)
Subject: San Fran Antibiotics letter Sept 2017 final
Date: Tuesday, September 26, 2017 11:12:58 AM
Attachments: [San Fran Antibiotics letter Sept 2017 final.pdf](#)

Mr. Carroll, good afternoon. Attached is a letter from the North American Meat Institute expressing the Meat Institute's concerns about File No. 170763, Antibiotic Use in Food Animals. I was unable to find on the city's website the email addresses of Supervisors Ronen, Sheehy, and Fewer so I would appreciate you forwarding this letter to them. Please contact me if you have questions about the letter or this email. Regards.

Register today for these NAMI Events:

Animal Care and Handling Conference, Oct. 19-20, Kansas City, MO

Advanced Listeria monocytogenes Intervention and Control Workshop, Oct. 24-25, Kansas City, MO

Worker Safety Conference and Awards for the Meat and Poultry Industry, Atlanta, Georgia, January 29-30, 2018

Environmental Conference and Awards for the Meat and Poultry Industry, Atlanta, Georgia, January 29-30, 2018

International Production and Processing Expo, Atlanta, Georgia, January 30-February 1, 2018

www.meatinstitute.org

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September 26, 2017

Mr. John Carroll
Clerk
Public Safety and Neighborhood Services Committee
City and County of San Francisco
1 Dr. Carlton B. Goodlett Place
Room 244
San Francisco, CA 94102

Re: File No. 170763: Environment Code — Antibiotic Use in Food Animals

Dear Mr. Carroll, Committee Members, and Board of Supervisors:

The North American Meat Institute (NAMI or the Meat Institute) submits this letter about the above-referenced file, File No. 170763, pertaining to reporting on antibiotic use in meat and poultry production. The Meat Institute is the nation's oldest and largest trade association representing packers and processors of beef, pork, lamb, veal, turkey, and processed meat products and NAMI member companies account for more than 95 percent of United States output of these products. The Meat Institute provides legislative, regulatory, public relations, technical, scientific, and educational services to the meat and poultry packing and processing industry.

The ordinance under consideration is a recipe for failure. Adopting the proposed ordinance will put livestock and poultry producers whose products are sold in San Francisco at a competitive disadvantage because of additional recordkeeping costs. Likewise, it will put packers and processors those products and the retail grocery stores who sell them in San Francisco at a competitive disadvantage because of the recordkeeping and segregation costs they will incur. Finally, given the added costs the ordinance would impose, San Francisco consumers ultimately would pay the price in more expensive meat and poultry products, all for a reporting program the benefits of which are uncertain.¹

¹ That the benefits of this onerous program are uncertain is evidenced by Section 2703(d), which provides "Five years from enactment of this Chapter, the Director shall evaluate whether the Reporting program continues to provide useful information to the public. Such review shall occur every two years thereafter." In other words, five years after enacting this experiment the city and county will decide whether it is useful.

There are more than a million cattle producers in the United States and about 60,000 hog producers. While not all of those producers raise livestock whose meat ends up in San Francisco, California cattle and hog producers, those producers in neighboring states, and even producers in the Midwest and the Southeast raise livestock and poultry whose meat ends up in California and likely in San Francisco.

The ordinance ignores the practicalities of raising livestock and producing the meat and poultry products they yield. For example, cattle begin life at a cow-calf operation and typically remain there for six to eight months. They then may go to a livestock auction market and end up with a stocker or backgrounder, or both, or they may go directly to the stocker or backgrounder. Most fed cattle spend the last four to six months at a feedyard before going to the packing house for slaughter. Dairy cattle, whose meat is used extensively in ground beef production, typically stay at one dairy before going to a slaughter facility. At any point along this process any individual animal, or subset of animals within a larger group, may be administered antibiotics to treat a condition. The ordinance effectively would impose costly recordkeeping obligations on everyone in this production process whose products may be sold in San Francisco, with the vast majority of those producers not knowing whether their products will be sold in that jurisdiction.

Likewise, the ordinance would impose recordkeeping and segregation costs on packers and processors who sell meat or poultry products in San Francisco. A packer who sells products that may end up in San Francisco would be forced either to dedicate lines or shifts to produce meat or poultry for that specific market or keep antibiotic use records for all animals the packer processes to ensure it could provide the required information to the retailer. In either event, the packer would require its suppliers to keep and provide the records discussed above.

The ordinance ignores other aspects of the meat and poultry industry that further complicating the system and making compliance impossible. For example, live cattle are bought into the United States from Canada and Mexico and feeder pigs are imported from Canada and eventually processed in this country. Likewise, the United States imports substantial amounts of beef from Canada, Australia, New Zealand, and Uruguay. Although some imported meat is used in further processed products, some of it sold in case ready form, *e.g.* lamb chops from New Zealand and Australia, and much of it is used in fresh ground beef production. Retailers would be responsible for securing antibiotic use information pertaining to livestock producers half way around the world. Simply put, the ordinance would impose costs and burdens on retailers that cannot be met.

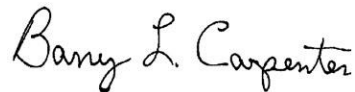
That these costs would put producers, packers, processors, distributors, and retailers at a disadvantage is undeniable. The California cattle producer whose meat eventually ends up in a San Francisco retail store required to report will bear recordkeeping costs that the producer just down the road or in Washington whose

meat is sold in Oakland, Sacramento, or elsewhere in California does not. Likewise, the California meat packer who sells meat in San Francisco will incur costs that his or her competitor whose products sell in Oakland, San Jose, or Palo Alto does not. Indeed, this recordkeeping burden could cause packers to elect to abandon the San Francisco market, harming consumers not only by making meat and poultry product more expensive but by limiting choice.

These costs and burdens would be imposed when the issues surrounding antibiotic use are being addressed. Earlier this year the Food and Drug Administration (FDA) implemented significant changes regarding how antibiotics are used and regulated for animals in the United States. FDA's new policy eliminates the use of medically important antibiotics for promoting growth in animals and requires all remaining uses to be accomplished under the supervision of a veterinarian. This new policy helps ensure medically-important antibiotics are used in food animals only to fight disease under the supervision of a licensed veterinarian.

Given this new federal policy and the commitment of the meat and poultry industry to limit antibiotic use, this ordinance would impose unnecessary recordkeeping burdens and costs. To avoid the red tape and paperwork nightmare that would come from adopting this ordinance, the North American Meat Institute urges rejection of this proposal.

Respectfully submitted,



Barry Carpenter
President and Chief Executive Officer

Cc: Mark Dopp
Pete Thomson
Janet Riley