CENTER FOR Science IN THE Public Interest
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Board of Directors
U.S. Roundtable for Sustainable Beef
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To Whom It May Concern,

We write from the Center for Science in the Public Interest (CSPI) to express our concern and disappointment at your rejection of our application to become a member of the U.S. Roundtable for Sustainable Beef (USRSB). We received a cursory letter from the USRSB denying our application earlier this month.[i] The letter provided no reason for the rejection, but instead simply indicated that our application was denied.

CSPI had hoped to serve as the first consumer group to join the USRSB. We aimed to bring a unique set of perspectives to the process, including greater emphasis on food safety, antibiotic stewardship, and public health. We would like to express our concern that the continued exclusion of consumer groups from membership in the USRSB will ultimately undermine the effectiveness of the Roundtable's work. In lieu of our participation as members, we offer three specific recommendations for improving the roundtable process moving forward:

1. ***Include Consumer Groups***

The USRSB is composed mainly of members of the beef and "allied" industries, including restaurants and pharmaceutical companies, but also represents itself as open members of civil society "with a stake in the beef value chain."[ii] Several environmental groups are current members, including the World Wildlife Fund and the Nature Conservancy. However, none of the current USRSB civil society members focuses primarily on representing consumers.

Consumers of beef certainly have a stake in its production and should be represented in any multi-stakeholder effort to make beef more sustainable. Moreover, CSPI is well-qualified to do so, based on more than 45 years representing consumer interests with independent, science-based advocacy on nutrition, food safety, and health. CSPI also expressed a willingness to engage collaboratively with other stakeholders toward the goal of continuous improvement in U.S. beef sustainability.

Our unexplained rejection therefore comes as a disappointment, undermining our confidence in the USRSB as a transparent and collaborative process. Ultimately, we fear that decisions like these weaken consumer trust in the USRSB, jeopardizing its efforts and credibility, and we encourage you to reconsider your choice.

2. ***Make Maintaining the Effectiveness of Antibiotics a High-Priority Indicator***

We agree with the USRSB's publicly stated vision that the U.S. beef industry should be a "global leader" in sustainability.[iii] When it comes to farming and food, Americans deserve the best, and that includes the best practices when it comes to sustaining the effectiveness of antibiotics for future generations of people and animals.

Antibiotic resistance threatens not only consumers but also farm families and rural communities. The pervasive nature of this threat is illustrated by the recent multi-state outbreak of multi-drug-resistant *Salmonella* linked to contact with bull dairy cows.[iv] People who make regular contact with animals may be especially at risk, as farmers,[v] their families, [vi] and people living in farming communities[vii] are more likely to carry methicillin-resistant *Staphylococcus aureus* (MRSA). Resistance also poses risks to animals, as is evident from the fact that high rates of multi-drug resistant bacteria associated with bovine respiratory disease have been detected in U.S. cattle, presenting a growing challenge in treating this economically devastating disease.[viii]

Antibiotics have historically delivered some of the greatest benefits known in human and animal health. Sustaining the effectiveness of antibiotics through careful stewardship must be a core component of any effort to promote the long-term sustainability of the beef industry. Globally, responsible use of antibiotics has been expressly recognized as a sustainability goal by the Canadian Roundtable for Sustainable Beef,[ix] the Australian Beef Sustainability Framework,[x] and the European Sustainable Agriculture Initiative Platform.[xi]

Yet far from being a global leader in this space, the USRSB has been conspicuously silent when it comes to sustainability for antibiotics. Strikingly, the words "antibiotic" and "antimicrobial" do not appear even once in the foundational USRSB documents describing proposed "indicators" and "metrics" that will serve as a basis for prioritizing, assessing, and measuring progress on sustainability.[xii]

When CSPI inquired about this lack of attention to antibiotics stewardship in the proposed indicators and metrics, we were informed that the USRSB addresses the issue indirectly as part of the metric on "Animal Health & Well-Being," by encouraging beef producers to incorporate "principles" of the Beef Quality Assurance (BQA) program into their management practices.

This approach strikes us as insufficient. First, failure to expressly incorporate antibiotic resistance directly into the USRSB's foundational indicators and metrics reflects a lack of appropriate prioritization and does not clearly communicate the necessary urgency around this important issue. Second, the BQA's history and continued focus is not aimed at combatting antibiotic resistance, but on reducing drug residues in meat, which is a fundamentally different goal.[xiii] And while the BQA, combined with strict federal regulation, has been highly effective in minimizing residues, its efforts are largely focused on assuring adequate withdrawal periods, which are not necessarily effective in reducing antibiotic resistance.[xiv]

Instead, the most effective way to prevent antibiotic resistance is through careful stewardship: minimizing the use of antibiotics that lead to resistance in the first place. While the BQA does offer a program manual that reprints standard veterinary advice on judicious antibiotics use and

summarizes recent federal guidance,[xv] it is not immediately clear how BQA certification, let alone incorporation of non-specific BQA "principles," would contribute to industry-wide improvements in antibiotics stewardship.

As a separate but related issue, we are concerned that the current set of six indicators selected by the USRSB to measure sustainability lacks an indicator for food safety. This absence is troubling because food safety is important to consumers and also offers a valuable frame for addressing antimicrobial resistance and its impact on human health. "Food Safety" as an indicator of sustainability was also ranked highly by USRSB stakeholders during the indicator development process, receiving the top score among indicators within the "Community" dimension of sustainability.[xvi] Nevertheless, the USRSB has not included food safety among its final set of six high-priority indicators. Instead, it selected "Worker Safety and Wellbeing" to serve as the sole "Community" indicator. This choice is particularly surprising given the fact that worker safety was ranked by USRSB stakeholders as relatively lower-priority during the indicator development process, well below food safety, transparency, consumer perception, and other options.[xvii]

We recommend that you expressly include the goal of sustaining the effectiveness of antibiotics among your high-priority sustainability indicators. This could be done by including a new indicator focused on antimicrobial effectiveness and/or food safety, or by incorporating language on antibiotics use directly within the primary definition of one of the existing indicators.

3. ***Select Specific, Meaningful, and Verifiable Metrics***

In addition to prioritizing the preservation of antibiotics as a top-line sustainability goal, the foundational USRSB documents should also include metrics for implementation that are specific, meaningful, and verifiable. For example, a metric promoting animal health and/or combating antibiotic resistance would include goals for specific improvements in meaningful animal health outcomes, such as a reduction in the frequency with which cattle require antibiotics treatment for disease. Alternatively, the metric could assess utilization of practices known to promote animal health and/or reduce the need for antibiotics, such as calf vaccination, use of probiotics in animal feed, or low-stress weaning techniques.[xviii,xix] Metrics could also rely on third-party verification, including qualified certification programs or third-party auditors, to verify improvements in animal health outcomes or the utilization of beneficial practices.

Unfortunately, the current metrics selected by USRSB beef producers to measure progress in Animal Health & Well-Being employ none of these measures.[xx] Instead, as noted above, the beef producers' metric on Animal Health & Well-Being is limited to encouraging producers to incorporate non-specific BQA "principles" into their operations. This failure to select specific, meaningful, and verifiable measures will impair the effectiveness of the USRSB in its goal of making the U.S. beef industry a trusted global leader in sustainability. We urge you to revise the current approach and lay a better framework for assessing beef sustainability moving forward.

Conclusion

For the credibility and reputation of the USRSB, and to promote its vision of global leadership, we ask that you:

1) Reconsider your decision to exclude consumer representatives from your membership.
2) Expressly include the goal of sustaining the effectiveness of antibiotics among your high-priority sustainability indicators.
3) Improve the existing metrics for beef producers by providing specific, meaningful, and verifiable measures for improvement.

We look forward to your reply and hope that, in the future, the USRSB will demonstrate that it includes and values the participation of all groups with a stake in the beef value chain, including consumers.

Respectfully,

Sarah Sorscher
Deputy Director of Regulatory Affairs, Center for Science in the Public Interest

Peter Lurie
President, Center for Science in the Public Interest

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[i] U.S. Roundtable for Sustainable Beef. Letter to Sarah Sorscher, Center for Science in the Public Interest. January 2, 2018. https://cspinet.org/sites/default/files/attachment/cspi-beef-letter.pdf. The letter was delivered by email to CSPI on January 9th.
[ii] U.S. Roundtable for Sustainable Beef. About. 2018. www.usrsb.org/about.aspx.
[iii] U.S. Roundtable for Sustainable Beef. Make a Difference. 2018. www.usrsb.org/.
[iv] Centers for Disease Control. Multistate Outbreak of Multidrug-Resistant *Salmonella* Heidelberg Infections Linked to Contact with Dairy Bull Calves. November 14, 2017. www.cdc.gov/salmonella/heidelberg-11-16/index.html. Accessed January 23, 2018.
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[viii] Klima et al. Pathogens of bovine respiratory disease in North American feedlots conferring multidrug resistance via integrative conjugative elements. *J. Clin Microbiol*. 2014;52(2):438-48.
[ix] Canadian Roundtable for Sustainable Beef. Sustainability Benchmarking. www.crsb.ca/about-us/our-work/sustainability-benchmark/. Accessed January 23, 2018. (Goal #8).
[x] Australian Beef Sustainability Framework. www.sustainableaustralianbeef.com.au/. Accessed January 23, 2018. (Priority Area 8.3 Antimicrobial Stewardship).
[xi] European Sustainable Agriculture Initiative Platform. Principles for Sustainable Beef Farming. www.saiplatform.org/uploads/Modules/Library/sai-platform-principles-for-sustainable-beef-farming-final.pdf. Accessed January 23, 2018. (Item 12).
[xii] U.S. Roundtable for Sustainable Beef. Indicator and Metric Summary. Undated. www.usrsb.org/CMDocs/USRSB/USRSB_metric_report_v2.pdf. Accessed January 23, 2018. The term "antibiotics stewardship," which includes "Residue Avoidance and Judicious Use," does make a solitary appearance among the principles described on page 60 of the 64-page document explaining how the current proposed USRSB indicators and metrics were developed. Boles EC, Matlock MD, Indicator Working Group Metric Development Report Version 5.0. November 14, 2017.
[xiii] Beef Quality Assurance. History of BQA. www.bqa.org/Media/BQA/Docs/bqa_antibiotics_final.pdf. Accessed January 23, 2018.
[xiv] Cazer CL, Monte Carlo simulations suggest current chlortetracycline drug-residue based withdrawal periods would not control antimicrobial resistance dissemination from feedlot to slaughterhouse. 2017;8. Article 1753.
[xv] Beef Quality Assurance. Antibiotic stewardship for beef producers. Undated. https://www.bqa.org/Media/BQA/Docs/bqa_antibiotics_final.pdf. Accessed January 23, 2018.
[xvi] Boles EC, Matlock MD, Indicator Working Group High Priority Indicator Development. University of Arkansas. February 1, 2016. https://cspinet.org/sites/default/files/attachment/usrsb-iwg-indicator-priority-report.pdf. Page 12. A different version of this document, which excludes information on rankings, is also available through the USRSB website: Boles EC, Matlock MD, Indicator Working Group Metric Development Report Version 5.0. November 14, 2017. www.usrsb.org/CMDocs/USRSB/USRSB_IWG_Metric_Report_V5_FINAL.pdf. Accessed January 23, 2018.
[xvii] Food safety was ranked first out of nine highest-priority "Community" indicators, and worker safety and wellbeing was ranked seventh. *Ibid.*
[xviii] Pew Charitable Trusts. Alternatives to Antibiotics in Animal Agriculture. July 10, 2017. www.pewtrusts.org/en/research-and-analysis/reports/2017/07/alternatives-to-antibiotics-in-animal-agriculture. Accessed January 23, 2018.
[xix] Beef Cattle Research Council. Weaning. www.beefresearch.ca/research-topic.cfm/weaning-65. Accessed January 23, 2018.
[xx] The USRSB allows each segment of the beef industry (producers, packers & processors, and retail & food service) to develop its own metrics, with input from other USRSB members. In contrast with the metrics for producers, the USRSB metrics proposed for Packers & Processors and Retail & Food Service are slightly more robust, with proposals to track and address animal welfare violations, track and set goals for animal health and well-being over time, and require animal welfare audits or certifications to verify compliance. U.S. Roundtable for Sustainable Beef. Indicator and Metric Summary. Undated. www.usrsb.org/CMDocs/USRSB/USRSB_metric_report_v2.pdf. Accessed January 23, 2018.