

Stuffed



The Use of Antibiotics and Other Drugs in the U.S. Turkey Industry

A report by Food Animal Concerns Trust

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About the Authors

This report was written by FACT's Food Safety Program Director Steven Roach with input from FACT's Humane Farming Program Director Lisa Isenhardt. Intern Travis Barnett helped with outreach to the companies.

This report is a project of FACT, Richard Wood, Executive Director

FACT's Vision

All food producing animals will be raised in a healthy and humane manner so that everyone will have access to safe and humanely-produced food.

FACT's Mission

Food Animal Concerns Trust (FACT) is a nonprofit organization that promotes humane farming and advocates for the safe production of meat, milk, and eggs. FACT helps consumers make humane and healthy choices.

More information about FACT is available at www.foodanimalconcerns.org

Layout by: Jacki Rossi, FACT's Communications Director

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Introduction

Food Animal Concerns Trust (FACT) is a nonprofit organization that promotes humane farming and advocates for the safe production of meat, milk, and eggs. We identify and advocate for steps that farmers should take to keep their cattle, pigs, turkeys and chickens from being the cause of humane disease. We also enable consumers to become informed shoppers & eaters by helping them make humane food choices and reduce their consumption of products from factory farms.

Turkey is a mainstay on holiday tables and is also an everyday staple for many families. Turkey production in the United States is expected to top 6 billion pounds in 2015.¹ Turkey is often considered a healthier option to other meats, but the use of antibiotics and other veterinary drugs in its production raise concerns about how healthy it truly is. The use of antibiotics can lead to the spread of antibiotics resistant superbugs, and other drugs can result in dangerous residues in meat or negatively impact animal health.

Because of these concerns, FACT contacted the 20 largest U.S. turkey producers and asked them about their use of antibiotics, the artificial growth promoter ractopamine, and the arsenic containing veterinary drug nitarsone. We chose antibiotics because of concerns about superbugs, ractopamine because its use can harm animal health, and nitarsone because its use could lead to cancer causing residues.



What did we find?

COMPANY	Stated Medically Important Antibiotics NOT Used For:		Stated Ractopamine NOT Used
	Prevention	Growth	
	YES	YES	YES
	YES	YES	YES
	NO	YES	YES
	NO	YES	YES
	NO	YES	YES
	NO	YES	YES
	NO	NO	YES
	NO	NO	YES
	NO	NO	YES
	NO	NO	NO
	NO	NO	NO
	NO	NO	NO
DID NOT RESPOND TO FACT'S INQUIRY:			
			
			Whitewater Processing Company

Antibiotics



FACT recognizes that animals may need to be treated with antibiotics when they become sick with a bacterial infection. However, antibiotics are often used in the absence of disease, either to promote growth or to prevent disease. Growth promotion uses cause the animals to put on weight more quickly with less feed. Disease prevention uses are to provide some insurance in animals for a disease that might happen but for which there are not currently any signs of illness. When used in this way, antibiotics are often given to all the animals in low doses and for a long duration. This practice is known to lead to the spread of superbugs.

Of the top 20 companies just one, Plainville Farms (a brand of Hain Pure Protein Corporation), sells only meat from turkeys that have not received antibiotics. Eight of the other top twenty companies (Cargill, Perdue Farms, Virginia Poultry Growers Cooperative, Foster Farms, Michigan Turkey Producers, Zacky Farms, Northern Pride, and West Liberty Foods) produce some, but not all of their turkeys under “a raised without antibiotics” or organic program.

While not using antibiotics at all does reduce the spread of superbugs, FACT believes that a policy to allow the sale of meat from animals that are treated when sick while prohibiting other uses, is better on animal health and welfare grounds.² Only Tyson Foods stated that they only use medically important antibiotics³ in their turkey production for the treatment of sick animals. This includes treating all animals in a group with antibiotics in water.

Four companies (Cargill, Jennie-O, Foster Farms, and Norbest) reported to FACT that they prohibit the use of medically important antibiotics for growth promotion, but did not report similar policies prohibiting their use for disease prevention. Because disease prevention is often a flock wide use that creates similar risks to growth promotion, we do not think that prohibiting growth use while allowing continued preventive use provides much public health benefit. Plainville Farms as noted above does not allow any antibiotics to be used. Tyson stated it uses medically important antibiotics only for treatment.

Fourteen of the 20 companies (Butterball, Farbest Foods, Perdue, Kraft Foods/Oscar Mayer, Dakota Provisions, West Liberty Foods, Cooper Farms, Michigan Turkey Producers, Turkey Valley, Zacky Farms, Northern Pride, Prestage Farm, Virginia Pultry Growers Cooperative and Whitewater Processing) did not report to us or include on their websites any indication that they have policies limiting the use of antibiotics for growth promotion or disease prevention in the conventional turkeys they raise.

Ractopamine

Ractopamine is an artificial growth promoter that is used in the last two weeks before slaughter to allow turkeys to add more muscle without getting fat. When it was approved, FDA recognized that its use could lead to increased mortality in turkeys under heat stress and its use in cattle and pigs has also been associated with health problems. It is banned in several countries because of concerns that its residues can cause heart problems in humans consuming meat from animals that received it.

Nine of the top twenty turkey producers (Butterball, Jennie-O, Turkey Store, Cargill, Tyson Foods, Plainville Farms, Perdue, Prestage Farms, and Norbest) told us that they do not use ractopamine in their turkeys. The other eleven companies did not respond to question about ractopamine use and we were unable to find any information about the drug on their websites.

Nitarsonsone

Nitarsonsone is an arsenical feed additive that was until recently used in turkey feed to prevent a parasitic disease. Nitarsonsone was the only arsenical drug that could legally be used in food animals in 2015. A similar drug, roxarsone, used to be fed to chickens but was pulled from the market in 2011 after the FDA found evidence that its use led to carcinogenic residues in chickens fed the drug.⁴ In May 2015, FDA announced that nitarsonsone, the remaining arsenical drug, would be withdrawn from sale by the end of 2015. When FACT started collecting information on turkey veterinary drug use in 2014, nitarsonsone was one of our major concerns. We are happy to report that after 2015 it will no longer be used in the United States. We do not report on the use of nitarsonsone because it will soon be withdrawn from the market if it has not already been withdrawn.

Transparency

FACT did its best to contact all of the top 20 turkey companies and received at least some response from 12 companies (Butterball, Jennie-O, Cargill, Farbest Foods, Tyson Foods, Perdue Farms, Kraft Foods/Oscar Mayer, Foster Farms, Prestage Foods, Michigan Turkey Producers, Hain Pure Protein, and Norbest.) The other 8 companies did not respond to written letters or emails requesting information, nor do they have readily identifiable information on the use of these drugs on their websites except in cases where they mention raising some portion of their turkeys without antibiotics or using organic production.

How Did We Collect This Information?

FACT sent certified mail letters to all of the top 20 turkey companies and asked them to fill out a survey (see Appendix A) on their use of antibiotics, ractopamine, and nitarsonsone. We followed up with emails to 19 of the companies (all except Turkey Valley Farms where we did not have an email address to contact). If we received an answer, we directed any follow-up questions to the person responding. We also reviewed the information available on the company websites. In some cases, we directed questions to company consumer affairs representatives using the contact information listed on the company webpages. We report above what the companies told us but are unable to verify it directly. It is likely that some companies purchase some turkeys from outside their systems and in these cases company policies may not apply. Most of the information on organic or raised without antibiotics claims came from company websites. FACT contacted, or attempted to contact, these companies during fall 2014 and through November 2015.

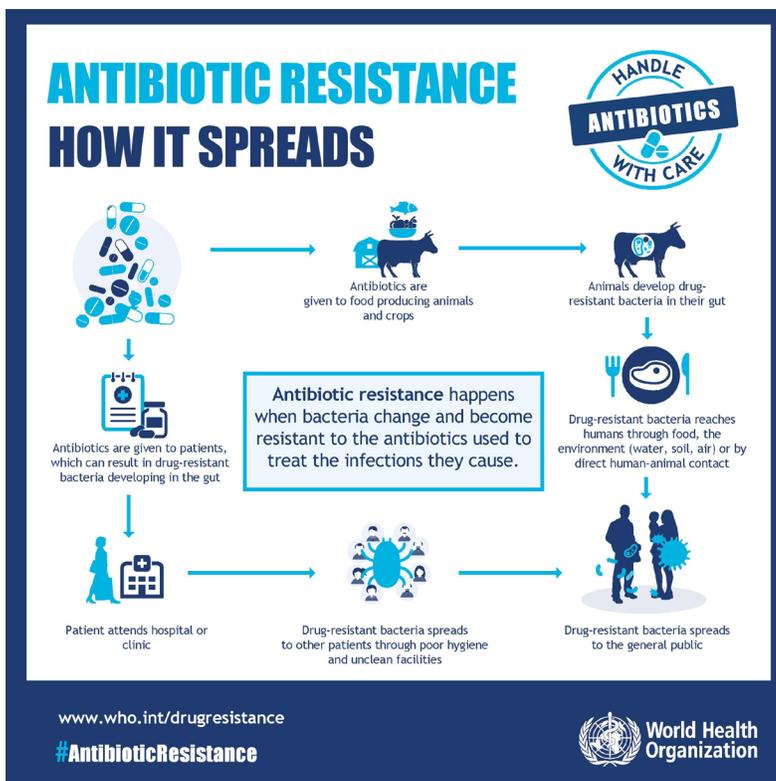
Several companies referred to a letter sent to FACT by the National Turkey Federation, but the National Turkey Federation letter did not state that ractopamine or routine antibiotics are never used to raise turkeys. Several companies referred to FDA guidelines but these guidelines have not been implemented and are not likely to take effect until December 2016. Several companies stated that they use antibiotics for treatment and prevention, but did not explicitly state that they do not use antibiotics for growth promotion. We did not interpret any of these responses as statements that they do not use antibiotics for growth or disease prevention or that they do not use ractopamine.

U.S. Turkey Production and Antibiotics



The spread of antibiotic resistance superbugs is an urgent public health crisis that already leads to over 2 million resistant illnesses and 23,000 deaths⁵ in the U.S. each year. The major driver of resistance is the overuse of antibiotics both in human medicine and animal agriculture. When antibiotics are used on farms, this can lead to the spread of superbugs through food, farm workers, and contaminated air and water. These resistant superbugs cause difficult to treat illness in people and in the animals themselves.

The FDA, which has authority over the safety of animal drugs acknowledges that the use of antibiotics in food animals can lead to the spread of superbugs affecting animal and human health. Since 2003, FDA has required new drugs coming on to the market to be shown to be safe with respect to resistance before they can legally be sold.⁶ Most antibiotics used in food animals were approved well before 2003. For these drugs, FDA has asked the drug makers to voluntarily remove labeled indications for growth promotion by December 2016.⁷ The companies have agreed to do this, but are not expected to make significant changes until the December 2016 deadline. Even if the companies make the changes as planned, the FDA plan does not restrict the routine use of antibiotics for disease prevention.

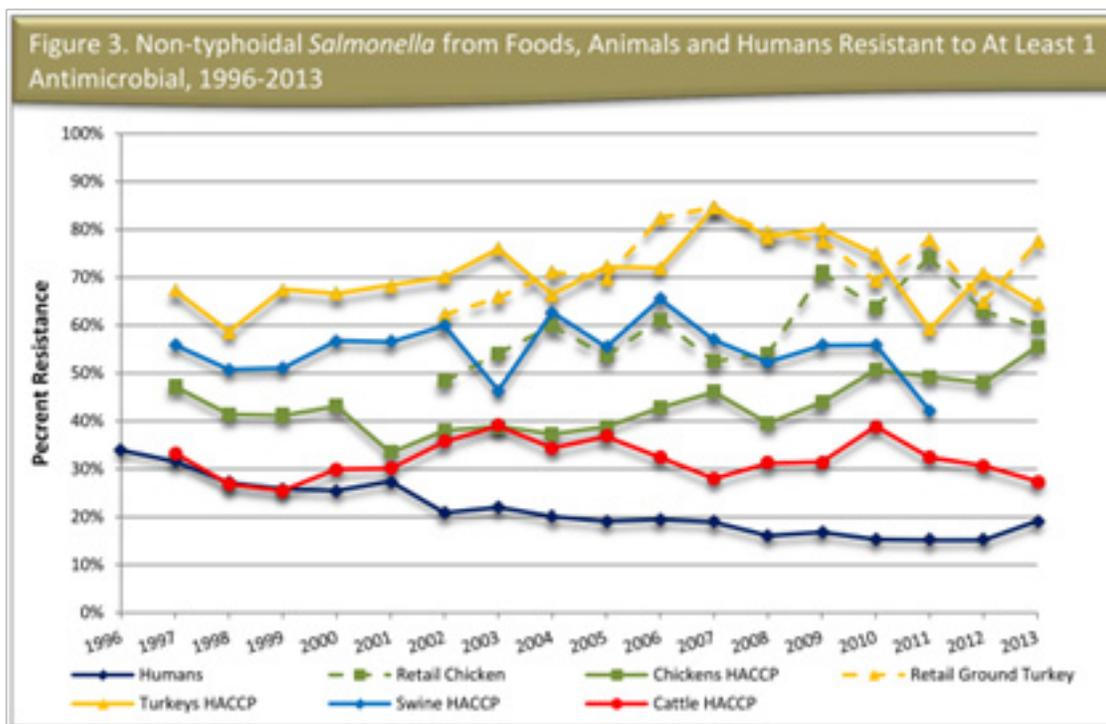


We do not know the quantity of antibiotics that are used on turkey farms nor do we know exactly why they are used. For all the major food animal species there is a lack of information on the use of antibiotics in their production, but for turkey this lack of data is comparatively much worse. The U.S. Department of Agriculture (USDA) has surveyed cattle, chicken, and pig producers about the antibiotics they use. This gives us a rough idea of what drugs are being used for what purposes.⁸ For turkeys, there is no such publicly available information.

What we do have are studies by the FDA and the USDA looking for the presence of superbugs on retail meat or in the animals at slaughter.⁹ The data collected by both of the federal agencies show that bacteria from turkeys and turkey meat are more resistant than bacteria from other animal species.

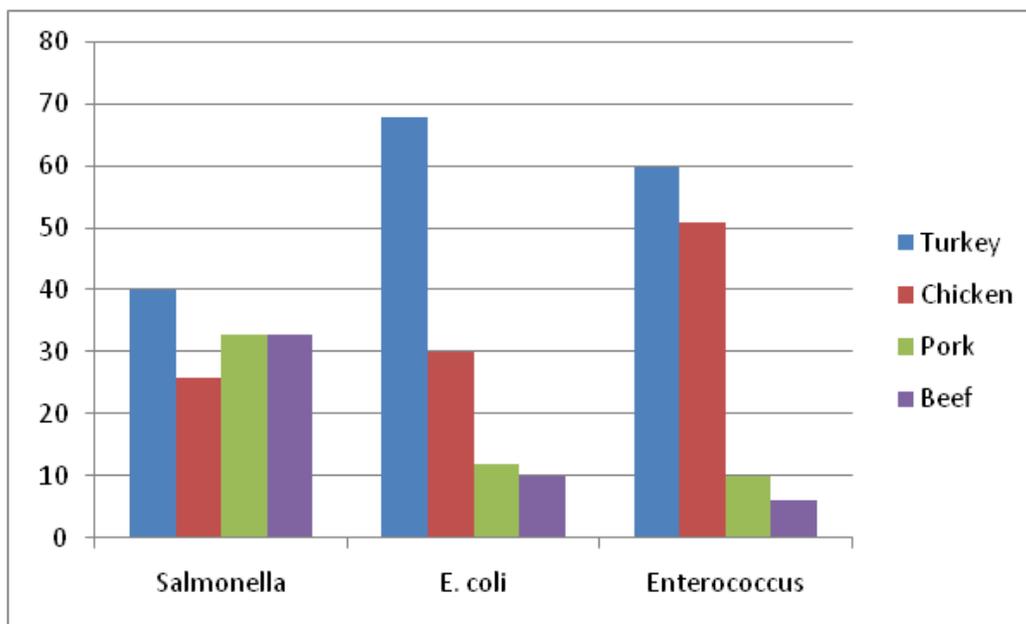


The image below from a recent FDA report on antibiotic resistance shows the percent of *Salmonella* collected both at slaughter and from retail meat that is resistant to at least one antibiotic.¹⁰ *Salmonella* is the most common bacterial foodborne pathogen in the United States and the Centers for Disease Control and Prevention consider resistant *Salmonella* to be a serious public health threat. As the figure shows, *Salmonella* from turkeys or turkey meat (the yellow lines) has consistently been more resistant than *Salmonella* from other food animals.



The same FDA report shows that in 2013, turkeys carried the highest level of multidrug resistant *Salmonella* (resistance to 3 or more types of antibiotics) among animal species. Second to *Salmonella* in occurrence is the foodborne pathogen *Campylobacter*, which is treated by the critically important antibiotic ciprofloxacin. The FDA report found that turkeys carried the highest level of resistant bacteria to this antibiotic. Another FDA report¹¹ that only looked at meat collected in retail stores found that in 2012 for two other bacteria (*Enterococcus* and *E. coli*) the turkey samples were much more likely to be multidrug resistant than bacteria from other food animal species. While we do not have good information on how antibiotic are used in turkey production, these studies show that turkey meat is clearly a source of superbugs.

Percent of Bacteria on Retail Meat Resistant to 3 or More Classes of Drugs



Given the high levels of multidrug resistance in bacteria from turkeys, FACT recommends that consumers not purchase turkey meat from companies that do not prohibit the routine use of antibiotics for growth promotion or disease prevention. FACT recommends that turkey producers make changes to their production systems so that the use of medically important can be limited to disease treatment.

U.S. Turkey Production and Ractopamine

While turkey companies are quick to say they do not use hormones or steroids, they rarely mention the beta-agonist drug ractopamine. Unlike steroids or hormones which cannot legally be used in turkeys, ractopamine is marketed under the trade name Topmax™ 9 for use in turkeys as an artificial growth promoter.¹² Beta-agonists are used in human medicine to control asthma, but are fed to animals to add more muscle with less feed. Many countries do not allow the use of ractopamine and have banned the import of meat produced with it.¹³ The main human health concern associated with ractopamine residues are effects on the heart.¹⁴

The threat to animal health of beta-agonists is clearer than the potential effects on human health from its residues. At the time of its approval for use in turkeys, FDA knew that ractopamine caused an elevated rate of mortality in turkeys during periods of heat stress.¹⁵ The use of beta-agonists in swine and cattle has also been associated with negative animal health effects including increased mortality in cattle.¹⁶

Given the potential human health impacts from residues combined with the negative animal health impacts, FACT recommends that consumers avoid products from companies that do not prohibit the use of this type of drugs. We recommend that food animal producers not use this product.

What should consumers do?



Value transparency. The food choices you make have a significant impact on the welfare of farm animals across the country. Your purchases let retailers and producers know that consumers are interested in humanely raised food products. FACT recommends that you avoid food from companies that refuse to answer questions about how the food is produced. “Just trust us” is not something that you should accept when it comes to the food you eat. We advocate for transparency in food production and recommend that you stay away from the turkey companies that that did not respond to the questions in our survey.

FACT also believes that it is important to avoid meats from companies that do not prohibit the feeding of ractopamine or the routine use of medically important antibiotics for growth promotion and/or disease prevention. Antibiotics and ractopamine are not the only concerns FACT holds about how turkeys are raised. Most turkeys in the United States are raised in large enclosed sheds housing around 15,000 birds per flock. FACT does not recommend purchasing from farms raising turkeys in this manner as they do not have access to the outdoors and do not experience a high level of animal welfare.

Buy humanely raised turkey. For those interested in purchasing turkey, we recommend you purchase turkeys that carry a 3rd party verified humane certification, such as Animal Welfare Approved. FACT’s [Guide to Common Food Labels](#) can help you to understand which labels are meaningful and backed up by independent verification, and which labels are misleading and promote unverified welfare claims. If you plan on purchasing a turkey from a local farm that raises turkeys on pasture, you can use our [Humane Principles for Turkeys](#) to evaluate how humane their production practices really are. For more information on how to find humanely raised products near you, [visit our Humane Choices webpage](#).

Advocate for an end to drug abuse on farms. Whether you eat turkey or not, you can contact companies that sell turkey in your area and ask them to stop using routine antibiotics or ractopamine. We have provided the contact information from all of the major turkey companies in Appendix B.

Appendix A. Survey

Survey For Turkey Producers on Veterinary Drug Use

Company Name _____

- 1) Do you have a published policy prohibiting the use of the arsenical veterinary drug nitarsone in turkeys raised or sold by your company?

Yes ___ No ___

- 2) Do you have a policy prohibiting the use of the beta-agonist ractopamine in turkeys raised or sold by your company?

Yes ___ No ___

- 3) Do you have a published policy regarding the use of antibiotics in turkeys raised or sold by your company?

Yes ___ No ___

- 4) If the answer to #3 is yes, then:

- a. Does the policy:

- 1) Prohibit the use of medically important antibiotics* for production purposes such as growth promotion, improved feed efficiency, or maintenance of growth?

Yes ___ No ___

- 2) Prohibit the routine use of medically important* antibiotics for disease prevention (i.e. use in flocks that do not have clinical signs of disease for animal health purposes)?

Yes ___ No ___

- 3) Does the policy prohibit the use of antibiotics in hatcheries supplying poults to your company?

Yes ___ No ___

- a. Please email the policy or provide a link to where it is available on line.

.* Medically important antibiotics are antibiotics that are in classes used both in human medicine and in food animals such as penicillins and tetracyclines.

- 1) Do you have product lines that have different standards than those described above?

Yes ___ No ___

- 2) If the answer to #5 is yes, then please list the lines along with information about what standards they must meet (e.g. organic, raised without antibiotics).

1) Do you track veterinary drug use in turkeys raised or sold by your company?

Yes ____ No ____

2) If the answer to #7 is yes, do you make information on the frequency of antibiotic and veterinary drug use in the production of your turkeys publically available?

Yes ____ No ____

If yes, please indicate where the information can be found:

Thank you very much! If you have questions regarding this survey, please contact Steve Roach of Food Animal Concerns Trust at sroach@foodanimalconcerns.org or (618) 203-2233.

Appendix B.

Company Responses (listed in order of number of turkeys produced)



1. Butter Ball LLC.

www.butterball.com

Contact: www.butterball.com/contact-us/contact-us-form, @butterball
Butterball Consumer Affairs, PO Box 1547, Kings Mountain, NC 28086.

A spokesperson from Jenni-O Turkey Store made the following statement to FACT in an email dated September 30, 2015: "To confirm, Butterball does not use ractopamine in its turkeys" and "Medications, such as antibiotics, are directed for prevention and treatment of disease and are always monitored closely by our veterinarians to maintain health and ensure comfort. We understand the sensitivities related to antibiotic use. That's why any medications used in the raising of our turkeys are approved by the United States Food and Drug Administration (FDA), in strict compliance with state and federal regulations."



2. Jennie-O Turkey Store (Hormel Foods)

www.jennieo.com

Contact: www.jennieo.com/contactus, @switchtoturkey

Hormel Foods Corporation, Consumer Response, 1 Hormel Place, Austin, MN 55912

A spokesperson from Jenni-O Turkey Store made the following statement to FACT in an email dated October 5, 2015: "We do not use medically important antibiotics for growth promotion as referenced in FDA's Guidance for Industry #213. Nitarsone has been banned for use beginning in 2016 and we are not using it. We also do not use Ractopamine in our system."



3. Cargill Turkey and Cooked Meats (Honeysuckle White®, Shady Brook Farms®, Plantation™, Schweigert™ and Harvest Provisions™)

www.cargill.com/company/businesses/cargill-turkey-cooked-meats/index.jsp

Contact: www.honeysucklewhite.com/Contact.aspx, @cargill

Cargill Meat Solutions Corp., P.O. Box 2519, Wichita, KS 67201-2519

In an email reply dated November 20, 2014 to a question placed through their consumer contact page Cargill stated: "Cargill does not use Ractopamine in turkey production. We do not use arsenic." Cargill publically announced on July 15, 2014 that it would phase out the use of antibiotics for growth promotion by the end of 2015. The 2015 Cargill Annual Report states "Cargill has removed growth-promoting antibiotics from our turkey flocks and we are exploring alternative methods for keeping animals healthy." Cargill sells a turkey labeled "no antibiotics ever" that is marketed under its Honeysuckle White brand.



4. Farbest Foods

www.farbestfoods.com

Contact: www.farbestfoods.com/contact-us

Farbest Foods Corporate Office, P.O. Box 480, Huntingburg, IN 47542-0480

A spokesperson from Farbest Foods replied in an email dated April 16, 2015 stating: "Farbest Foods, Inc. supports the position that the National Turkey Federation has outlined for you recently. I have attached a copy of that position for your convenience, and it will serve as our official position on this matter."



5. Tyson Foods (Hillshire Farm)

www.tysonfoods.com

Contact: comments@tyson.com, @tysonfoods

Tyson Foods, Inc. P.O. Box 2020, CP631, Springdale, AR 72765-2020



A spokesperson from Tyson Foods made the following statement to FACT in an email dated October 5, 2015: “For turkeys we don’t use any antibiotics in the hatchery or feed. If antibiotics are administered it is done via the drinking water and under the direction and prescription of a veterinarian. We do use ionophores in the feed. No arsenicals or ractopamine are used in our turkey production.” Tyson Foods responded to FACT’s survey on April 2, 2015 stating that Tyson Food’s policy did not allow the use of medically important antibiotics for disease prevention.



6. Perdue Farms

www.perdue.com

Contact: www.perdue.com/connect-with-us, @perduechicken

Perdue Consumer Relations, P.O. Box 788, Kings Mountain, NC 28086

Perdue Farms responded to our request for information on April 1, 2015 stating: “Close to one-fifth of the turkeys we raise are produced using no-antibiotics-ever, and we are learning from this effort. We are committed to reducing antibiotic use in turkeys...[W]e’re not as advanced in reducing antibiotic use in turkeys as we are in chickens.” Perdue responded to a follow up email stating on October 20, 2015 that:

Turkey products that do not carry a No Antibiotics Ever label may receive antibiotics. In general, our conventionally raised turkeys:

- Receive an FDA-approved antibiotic at the hatchery,
- Receive FDA-approved antibiotics, such as ionophores, in the feed for disease prevention
- If a flock gets sick with a treatable disease, they may receive a FDA-approved antibiotic in the drinking water with board-certified veterinarian oversight.

This clearly indicates that they allow the use of antibiotics for routine disease prevention. FACT received an email reply from a Perdue spokesperson on October 10, 2015 stating that they did not allow the use of ractopamine.



7. Kraft Foods (Oscar Mayer)

www.oscarmayer.com

Contact: www.kraftfoods.custhelp.com/app/contact/sa/1, @kraftfoods

Kraft Heinz Company, Consumer Relations, Three Lakes Drive, Northfield, IL 60093

A spokesperson from Kraft Foods (Oscar Mayer) made the following statement to FACT with respect to the companies use of ractopamine in an email dated October 5, 2015: “I’m sorry as I’d like to assist you, the information you’re requesting isn’t currently available.” Kraft Foods (Oscar Mayer) has the following statement on their website “Kraft requires our suppliers to meet or exceed all government regulations, including those from the USDA and the FDA. Antibiotics, administered under veterinary supervision, play an important role helping sick animals recover. New FDA guidelines call for meat, poultry and dairy farmers to stop using antibiotics important to people as growth promotants in animals in 2016.” Since the FDA Guidelines are not likely to take effect before December 2016, this policy will not currently have any impact.



8. Virginia Poultry Growers Cooperative

www.vapoultrygrowers.com

Contact: www.kraftfoods.custhelp.com/app/contact/sa/1, @kraftfoods

Kraft Heinz Company, Consumer Relations, Three Lakes Drive, Northfield, IL 60093

FACT didn't receive a reply from the Virginia Poultry Growers Cooperative. The company website indicates that Virginia Poultry Growers Cooperative produce organic and no antibiotics used as well as conventional turkeys. We were unable to find any information on antibiotic use or ractopamine on the website.



9. Foster Farms

www.fosterfarms.com

Contact: www.fosterfarms.com/about/contact.asp, @fosterfarms

Foster Farms Consumer Affairs, P.O. Box 306, Livingston, CA 95334

Foster Farms stated in an email dated April 16, 2015 that they do not use ractopamine. Foster Farms has information on their antibiotic use on the company website stating "Foster Farms never uses antibiotics for the purpose of growth promotion." Elsewhere, the website states that "animal-use only antibiotics will be the primary choice for prevention of disease" in its chicken flocks indicating that medically important antibiotics may be used for disease prevention in chickens as a secondary choice. Foster Farms announced in July 2015 that it was marketing organic ground turkey.



10. Dakota Provisions

www.dakotaprovisions.com/

Contact: contact@dakotaprovisions.com

Dakota Provisions, 40253 US-14, Huron, SD 57350

FACT did not receive a reply from Dakota Provisions. We were unable to find any information on antibiotic use or ractopamine on the company website.



11. West Liberty Foods

www.wlfoods.com

Contact: www.wlfoods.com/wlf_inquiry.aspx

West Liberty Foods, L.L.C., P.O. Box 318, West Liberty, Iowa 5277

FACT did not receive a reply from West Liberty Foods. We were unable to find any information on antibiotic use or ractopamine on the company website. A media report states that West Liberty Foods is producing some raised without antibiotic turkeys.



12. Cooper Farms

www.cooperfarms.com

Contact: www.cooperfarms.com/contactus.aspx

Cooper Farms, P.O. Box 339, North Fort Recovery, OH 45846

FACT did not receive a reply from Cooper Farms. We were unable to find any information on antibiotic use or ractopamine on the company website.

**13. Michigan Turkey Producers**

www.miturkey.com

Contact: info@miturkey.com

Michigan Turkey Producers, 1100 Hall Street SW, Grand Rapids, MI 49503

A spokesperson from Michigan Turkey Producer made the following statement to FACT in an email dated October 7, 2015: "As you are aware, the NTF [National Turkey Federation] has previously responded to your inquiries on this matter. Their response is accurate and we have nothing to add."

**14. Turkey Valley Farms**

www.turkeyvalleyfarms.com

Contact: (507)337-3100

Turkey Valley Farms, P.O. Box 200, Marshall, MN 56258

FACT did not receive a reply from Turkey Valley Farms. We were unable to find any information on antibiotic use or ractopamine on the company website.

**15. Hain Pure Protein (Plainville Farms)**

www.plainvillefarms.com

Contact: <http://plainvillefarms.com/about-plainville-farmscontact>, @plainvillefarms

Plainville Farms - a division of Hain Pure Protein Corp
PO Box 38, New Oxford, PA 17350



In an email dated October 20, 2014, Plainville Farms stated they do not use ractopamine and that they never use antibiotics. The company website is also clear on the use of antibiotics.

**16. Prestage Farms**

www.prestagefarms.com

Contact: www.prestagefarms.com/contact

Prestage Farms P. O. Box 438 Clinton, NC 28329

Prestage Farms stated in an email dated April 16, 2015 they do not use ractopamine. With respect to antibiotics Prestage Farms stated that "We use as few antibiotics as possible, and it is important to understand that it is often more prudent to use antibiotics to prevent and control disease, earlier and at lower levels, than it is to treat disease later at higher levels, often with poorer results, and closer to processing age. FDA Guidance 209 and 213 will be federal law, and we fully intend to comply, which dictate no use of growth promotant antibiotics, and veterinary oversight and mandatory prescription of antibiotics used in food animals of all species." Since Guidance 209 and 213 are not expected to take effect until December 2016, this does not indicate they do not currently use antibiotics for growth promotion. This does state that they use antibiotics for disease prevention.



17. Norbest Inc.

www.norbest.com

Contact: www.norbest.com/contact-us

Norbest, LLC, P.O. Box 890, Moroni, UT 84646

Norbest stated in an email dated April 17, 2015 that Norbest/Moroni Feed Company does not use, nor does our drug policy permit, the use of ractopamine, nitarsone, or the routine use of medically important antibiotics. In a follow up email the Norbest spokesperson stated "The more specific meaning of my "routine use" was that we don't use medically important antibiotics for growth promotion or as a disease preventative in flocks that are in good health." The Norbest spokesperson did not answer a follow up question about preventive use in hatcheries.



18. Zacky Farms

www.zacky.com

Contact: Lillianzacky@zacky.com

Zacky Farms P.O. Box 12556, Fresno, CA 93778

FACT did not receive a reply from Zacky Farms. We were unable to find any information on antibiotic use or ractopamine on the company website. Zacky Farms does produce "free range" turkeys but did not provide any information on antibiotic use or ractopamine for them.



19. Northern Pride

www.northernprideinc.com

Contact: troy@northernprideinc.com

Northern Pride, Inc., 401 South Conley Ave., Thief River Falls, MN 56701

FACT did not receive a reply from Northern Pride. We were unable to find any information on antibiotic use or ractopamine on the company website. The company website does indicate that produce some turkeys without antibiotics.

20. Whitewater Processing Co.

No website

Contact: (513) 367-4133

Whitewater Processing Co. ,10964 Campbell Road Harrison, OH 45030

FACT did not receive a reply from White Water Processing. We where unable to identify a publically available company website.

Endnotes

1. <http://www.wattagnet.com/articles/19011-us-poultry-production-to-increase-in-2015-says-usda>
2. Companies marketing products as raised without antibiotics require animals to be treated when needed but then remove the treated animals from the marketing program. This can cause welfare problems if a farmer delays treatment to avoid leaving the program, is unfair to farmers that despite taking appropriate steps to prevent disease have sick animals, and creates the expectation in consumers that animals never get sick.
3. Antibiotics are considered medically important if they are the same as or closely related to drugs used in human medicine. While there are risks associated with using antibiotics that are not medically important the available evidence suggests that these risk are less than for the medically important drugs
4. <http://www.fda.gov/AnimalVeterinary/SafetyHealth/ProductSafetyInformation/ucm257540.htm>
5. <http://www.cdc.gov/drugresistance/threat-report-2013/>
6. <http://www.fda.gov/downloads/AnimalVeterinary/GuidanceComplianceEnforcement/GuidanceforIndustry/ucm052519.pdf>
7. <http://www.fda.gov/downloads/AnimalVeterinary/GuidanceComplianceEnforcement/GuidanceforIndustry/UCM299624.pdf>
8. <http://www.usda.gov/documents/usda-antimicrobial-resistance-action-plan.pdf>
9. <http://www.fda.gov/AnimalVeterinary/SafetyHealth/AntimicrobialResistance/NationalAntimicrobialResistanceMonitoringSystem/>
10. <http://www.fda.gov/downloads/AnimalVeterinary/SafetyHealth/AntimicrobialResistance/NationalAntimicrobialResistanceMonitoringSystem/UCM453398.pdf>
11. <http://www.fda.gov/downloads/AnimalVeterinary/SafetyHealth/AntimicrobialResistance/NationalAntimicrobialResistanceMonitoringSystem/UCM442212.pdf>
12. <http://www.accessdata.fda.gov/scripts/animaldrugsatfda/details.cfm?dn=141-290>
13. <http://nationalaglawcenter.org/wp-content/uploads/assets/crs/R42954.pdf>
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