

CHAIN REACTION



HOW TOP RESTAURANTS RATE ON REDUCING USE OF ANTIBIOTICS IN THEIR MEAT SUPPLY

A REPORT BY:



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Executive Summary

From double bacon cheeseburgers to chicken nuggets, most meat served by America's top chain restaurants comes from animals raised in industrial-scale facilities where they are routinely fed antibiotics.¹ These drugs are often used to accelerate animal growth and prevent diseases stemming from poor diets and crowded, stressful and dirty conditions, rather than for treatment of sick animals.² When livestock producers administer antibiotics routinely to their flocks and herds, bacteria can develop resistance, thrive and even spread to our communities, contributing to the larger problem of antibiotic resistance.³ The worsening epidemic of resistance means that antibiotics may not work when we need them most: when our kids contract a staph infection (MRSA), or our parents get a life-threatening pneumonia. The Centers for Disease Control and Prevention (CDC) has declared antibiotic resistance among the top five health threats facing our nation.⁴

Nearly half of the money Americans devote to food is spent on meals outside the home,⁵ giving

large restaurant chains substantial influence over the meat we eat and how it is produced. At the same time, consumers are increasingly insisting on healthier and more sustainable meat options, including meat produced with fewer antibiotics.⁶

In order to evaluate restaurant chains' policies and practices regarding the use of antibiotics in their meat and poultry supply chains, our group of consumer interest, public health, and environmental organizations⁷—representing millions of supporters—conducted a survey (see Appendix 1) and reviewed public statements of the 25 largest⁸ U.S. fast food and fast casual restaurants. Based on the information collected, we created an industry scorecard that assesses the commitments of U.S. restaurant chains on antibiotics use and transparency in their supply chains. Our intention is to publish the scorecard on an annual basis. Our scorecard criteria are more fully described in Appendix 2.

The scorecard highlights leading companies that are responding to increasing consumer demand



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for meat produced with fewer antibiotics. A number of major chains—Panera Bread, Chipotle Mexican Grill, Chick-fil-A, Dunkin’ Donuts and McDonald’s—have adopted policies that either limit the use of medically-important antibiotics,ⁱ or prohibit any antibiotic use in the production of the meat they serve. Panera and Chipotle are the only chains that publicly affirm that the majority of their meat and poultry offered is produced without routine use of antibiotics. Chick-fil-A and McDonald’s have established policies limiting antibiotic use in their chicken with implementation timelines, while Dunkin’ Donuts has a policy covering all meats but has no reported timeline for implementation.

Most top U.S. chain restaurants, including Subway, Wendy’s, Burger King and Kentucky Fried Chicken (KFC), have so far failed to effectively respond to this growing public health threat by publicly adopting policies restricting routine antibiotic use by their meat suppliers.ⁱⁱ

The prevalence of antibiotic misuse and overuse in U.S. meat production reflects a broader tendency of poor farm management and animal welfare practices in industrial U.S. meat production.

The goal of this soon-to-be annual survey and scorecard is to empower consumers with information to make better choices when they eat in leading U.S. restaurant chains. By highlighting industry leaders and laggards, we hope to encourage more top restaurant chains to publicly adopt policies that would end the routine use of antibiotics. We also seek to promote greater overall transparency about restaurant purchasing policies and supply chain drug use practices in the U.S. restaurant industry.

The prevalence of antibiotic misuse and overuse in U.S. meat production reflects a broader tendency of poor farm management and animal welfare practices in industrial U.S.

meat production.⁹ Eliminating unnecessary uses of these antibiotics by the meat industry is an important step towards creating a healthier food system. Major U.S. restaurant chains can make an important contribution to tackling antibiotic resistance by working with their meat and poultry suppliers to reduce routine use of antibiotics. Restaurant companies should also encourage producers to improve animal diets and management practices within their facilities, as this reduces the reliance on routine drug use for disease prevention.



Antibiotic overuse in animals makes drugs less effective for humans; 23,000 Americans die from antibiotic resistant infections each year.

Antibiotic Resistance and the Role of Antibiotics Misuse in Livestock

Each year, at least two million Americans contract antibiotic-resistant infections, and 23,000 die as a result.¹⁰ The economic costs of this are huge: up to \$55 billion in excess hospital expenses and lost productivity costs.¹¹ The World Health Organization recently stated, “A post-antibiotic era—in which common infections and minor injuries can kill—far from being an apocalyptic fantasy, is instead a very real possibility for the 21st Century.”¹² Numerous leading medical and health groups, including the American Academy of Pediatrics and the American Medical Association, have recognized the urgency of preserving antibiotics.¹³

Antibiotic use in animal agriculture has been

i “Medically important antibiotics” are antibiotics that are the same as, or similar to, drugs used in human medicine. For example the livestock antibiotic, tylosin, is a member of the macrolide class, which also includes the human drug, erythromycin. Tylosin therefore is considered to be medically important.
ii “Routine” use includes use for growth promotion and disease prevention, rather than to treat sick animals.



Fed to animals at low levels day after day, antibiotics kill weak germs, leaving behind those hardest to destroy. These drug-resistant bacteria can multiply and spread to our communities via meat and poultry, farm workers and through the air, soil and water.

linked to human bacterial infections that are resistant to antibiotics.¹⁴ Fed to animals at low levels day after day, antibiotics kill weak germs, leaving behind those hardest to destroy. These drug-resistant bacteria, or “superbugs,” don’t stay at the livestock facilities. They can multiply and spread to our communities via meat and poultry, farm workers and through the air, soil and water.¹⁵ Resistance to antibiotics can pass from bacteria to bacteria, and even to other unrelated species of bacteria.¹⁶ Moreover, use of an antibiotic can lead to the spread among bacteria of resistance to an unrelated drug¹⁷ or even to multiple drugs at once, including some that have never been used in food animals.¹⁸

As antibiotic-resistant bacteria proliferate in the world around us, the medications used to treat infections become less effective, leading to more frequent and longer hospital stays and sometimes even death.¹⁹ While the general population now faces higher risks of contracting an antibiotic-resistant infection, the risk of falling ill or dying from such infections falls especially hard on children, seniors, and those with compromised immune systems.²⁰

Misuse of antibiotics in human medicine is a significant factor in worsening resistance, but

the CDC, the National Academy of Sciences and other expert bodies agree that the misuse and overuse of antibiotics in food animals contributes to this public health problem as well.^{21,22} In its recent report *Antibiotic Resistance Threats in the United States, 2013*, the CDC stated: “Up to half of antibiotic use in humans and much of antibiotic use in animals is unnecessary and inappropriate and makes everyone less safe.”²³

Nonetheless, little has been done to curb systematic misuse of antibiotics in the conventional meat industry.²⁴ According to the Food and Drug Administration (FDA), sales to the livestock sector of medically-important antibiotics surged 20 percent from 2009 to 2013.²⁵ The FDA has provided only voluntary guidance for responsible use of antibiotics in animals, and explicitly condones the continued routine use of antibiotics for disease prevention in the absence of disease (see box on p. 10). In the U.S., about 70 percent of medically-important antibiotics are sold for livestock use.²⁶ Because of the significant role of antibiotic misuse in meat production, the growing problem of antibiotic resistance cannot be solved unless meat producers and large meat buyers—including in the restaurant industry—are part of the solution.

Key Findings

Most top U.S. restaurant chains have no publicly available policy to limit routine use of antibiotics (either all antibiotics or medically-important antibiotics) for disease prevention and growth promotion in their meat and poultry supply chains.

- ❖ Only five of the top 25 chains have adopted publicly available policies that meaningfully limit routine antibiotics use: Chipotle Mexican Grill, Panera Bread, Chick-fil-A, Dunkin' Donuts and McDonald's. These policies range from strict prohibitions on any antibiotics use (Chick-fil-A), to policies that prohibit use in chicken of antibiotics important in human medicine (McDonald's).²⁷
- ❖ While each of the companies received a top score for having "good" policy content, they varied in terms of other points awarded based on whether that policy applied to all the meats that company serves, as well as on the current availability of meat and/or poultry produced without routine antibiotics. For example, McDonald's received fewer points because routine use of antibiotics is still allowed for "disease prevention" in the production of its pork and beef and the company is not publicly reporting on the current percentage of poultry served that is raised without routine antibiotics.
- ❖ Only Chipotle, Panera, Chick-fil-A and Dunkin' Donuts have antibiotics use policies that apply to all the meat they serve. Although Dunkin' Donuts has adopted a good antibiotics use policy, it has not made public a timetable for when suppliers must meet company requirements and it is unclear how much, if any, meat served in its restaurants meets policy specifications. We therefore rated Dunkin' Donuts at 0 (of 8) for estimated current availability.
- ❖ While Subway did not respond to our survey, recent news outlets report that the company's goal is to "eliminate the use of antibiotics in products across the menu" and that Subway is "targeting to transition to chicken raised without antibiotics important to human

medicine in 2016."ⁱⁱⁱ We grant Subway partial credit (5/10) for good policy because: a) the information available on its website indicates only support for the "elimination of sub-therapeutic use of antibiotics", but is unclear whether this would entail the end of all routine antibiotic use in its supply chains, potentially contradicting the above press statement; b) use of the word "targeting" creates uncertainty about the level of commitment; and c) efforts to clarify Subway's position have been unsuccessful, despite repeated attempts by the report's authors to reach out via email and telephone.

- ❖ While Starbucks has made positive statements supporting what it terms as "responsible use of antibiotics to support animal health," to our knowledge the company has failed to adopt a clear policy prohibiting routine use of antibiotics in its meat and poultry supply chains or to provide detailed public information on their purchasing practices.²⁸ Starbucks did not respond to our survey.
- ❖ The following chains either have no disclosed policy on antibiotics use in their meat and poultry, or have policies that in our estimation allow for the continued, routine use of antibiotics in the production of all meats they serve: Burger King, Wendy's, Olive Garden, KFC, Chili's, Sonic, Denny's, Domino's, Starbucks, Papa John's Pizza, Taco Bell, Pizza Hut, Applebee's, Jack in the Box, Arby's, Dairy Queen, IHOP, Outback Steakhouse, and Little Caesars.

Only two top restaurant chains report serving a majority of their meat from animals raised without the routine use of antibiotics.

- ❖ Panera Bread and Chipotle Mexican Grill report that they currently offer an array of meat options produced without the routine use of antibiotics, including pork and beef. Panera reports that 100 percent of its pork and chicken and one-third of its turkey is raised without antibiotics. Its policy for beef is under review.

iii Jennings, L. (2015, Aug 28). Subway plans shift to antibiotic-free meat. Nation's Restaurant News. Retrieved on 3 September 2015 from <http://nrrn.com/health-nutrition/subway-plans-shift-antibiotic-free-meat>.

iv While Panera does not yet have a policy prohibiting the routine use of antibiotics for beef, they provided detailed information in response to our survey on their current beef suppliers and the antibiotics use policies and practices of those suppliers, earning them partial credit in this category.



U.S. pig farms frequently administer antibiotics in feed for growth promotion and/or routine disease prevention.

In the meantime, the company reports that its primary beef supplier provides only meat that was raised without antibiotics, while its other beef supplier allows for treatment only when animals are sick.^{iv} Chipotle reports that it prohibits the routine use of all antibiotics for disease prevention and growth promotion and that this policy applies to over 90 percent of their meat.²⁹

- ❖ Chick-fil-A, the largest U.S. chicken chain by domestic sales volume, has committed to serve 100 percent no-antibiotics chicken by 2019³⁰ and indicates that as of March 2015, 20 percent of its chicken meets this standard.³¹
- ❖ In early 2015, McDonald's, the largest and most iconic fast food chain in the U.S., announced that within two years it would only serve chicken raised without use of medically-important antibiotics in its approximately 14,000 domestic restaurants.³² However, the company has not disclosed what percentage of its chicken currently meets this standard. McDonald's did not complete our survey.

Most restaurants are keeping consumers in the dark about their meat sourcing policies.

- ❖ Panera, Chipotle and Chick-fil-A stand out as the most transparent of the companies surveyed, providing detailed responses to all survey questions.
- ❖ Chick-fil-A and McDonald's provide the most

detailed antibiotics use policies online, but only Chick-fil-A is committed to regularly and publicly reporting progress towards its goal of sourcing 100 percent no-antibiotics chicken by 2019.

- ❖ Many U.S. restaurant chains were unresponsive to our requests for information, with only one-third of those surveyed for this scorecard providing written responses.
- ❖ On their websites, 16 of 25 restaurants surveyed fail to provide customers with basic information about their policies regarding the use of antibiotics and other drugs in the meat they purchase.
- ❖ Of the restaurants reporting strong antibiotics policies, only three have made public commitments to independent third-party monitoring to ensure compliance with those policies. This group includes Panera Bread, Chick-fil-A, and McDonald's.^v
- ❖ Chipotle reports that it relies on a combination of in-house and contracted auditors to monitor compliance with their standards. In addition, all of its suppliers are required to have an internal audit program and schedule. Wendy's also reports the use of both trained in-house Quality Assurance representatives and third party consultants to verify conformance to its antibiotic use policies, which prohibit use of antibiotics for growth promotion purposes but still allow routine use for prevention of illness.

^v As the market for meat raised without antibiotics grows, third-party verification of compliance will be a key element of company policies. The authors of this report support verification programs that are administered by independent third-party certifiers that regularly audit antibiotics use practices against clear, publicly searchable antibiotics use standards, feature unscheduled audits of supplying farms, and require timely correction of any established policy violations. Auditors should be permitted access to records documenting compliance and may conduct spot checks of the premises and contents, including testing if appropriate. In today's marketplace, this includes the USDA Process-Verified program, USDA Certified Organic, and multiple independent certification regimes, such as the Global Animal Partnership and Animal Welfare Approved.

Antibiotics Policies and Sourcing Practices*

Restaurant	Good Policy (10)	Policy Applies to All Types of Meat (8)	Availability of Meat Produced without Routine Antibiotics** (8)	Third Party Audits (4)	Policy Online (3)	Responded to Survey (3)	Total Points	Total Possible Points	Percentage Total	Grade
	10	6	8	3	3	3	33	34	97%	A
	10	7	8	4	3	3	35	36	97%	A
	10	2	3	4	3	3	25	32	78%	B
	10	8	0	0	3	3	24	36	67%	C
	10	2	1	4	3	0	20	34	59%	C
	5	2	1	1	2	0	11	36	31%	F
	0	0	0	3	3	3	9	36	25%	F
	0	0	0	0	3	0	3	34	9%	F
	0	0	0	0	0	3	3	36	8%	F
	0	0	0	0	0	3	3	34	9%	F
	0	0	0	0	1	0	1	36	3%	F
							0	36	0%	F

* Information in this graphic regarding companies' antibiotics policies and/or meat purchasing practices reflects "Reported Information", as defined in Appendix 2, and therefore comes from companies' responses to the survey, follow up emails, public statements made by the companies, and/or efforts by the report's authors to locate such policies online.

**These are estimated percentages as determined by the report's authors and based on Reported Information, as described above.

Survey Methodology

The authors of this report surveyed (in person, and via email and traditional mail) the top 25 U.S. fast food and fast casual restaurant chains, as ranked by total U.S. sales, to compare meat sourcing policies and practices regarding: 1) use of antibiotics; and 2) transparency. The survey in its entirety can be found in Appendix 1.

The survey also asked restaurant companies about their meat sourcing policies and practices in two related areas: 3) availability of organic meats and grass-fed beef options on their menus, as organic production disallows routine antibiotic use and grass-fed production discourages it; and 4) use of hormones and beta-agonists in their meat and poultry supply chains. The last question was largely motivated by the concern that meat producers might increase use of these potentially harmful non-antibiotic growth promoting drugs (see p. 11) as they phase out the use of antibiotics. While responses to these latter two questions are not incorporated into scorecard rankings, a discussion of these issues is summary of the survey findings on this issue can be found in the next section.

In addition to reviewing responses to the survey, we examined company websites, annual reports and other publicly available information on company policies. We sent at least one follow up email and/or phone call in cases where the companies did not respond to the survey. In cases where survey responses were not clear, we followed up with clarification questions via email. Appendix 3 contains a summary of companies' policies and survey responses.

The Reported Information^{vi} collected was used to create an industry scorecard that assesses the commitments of U.S. restaurant chains on antibiotics use and transparency in their supply chains. The scorecard is intended to help consumers make educated choices about the meat they eat, and encourage companies in this industry to improve their sourcing policies. Restaurants were given scores or grades based on criteria, described in Appendix 2, that are weighted according to various factors.

vi As defined in Appendix 2

Government Policy Failures

Despite the threat to public health, many companies in the meat and pharmaceutical industries have for decades successfully blocked regulatory restrictions on antibiotic use in livestock.³³ Legislation to phase out the meat industry's routine use of antibiotics has stalled for years in Congress.³⁴

In December 2013, the FDA initiated tepid reforms by encouraging drug makers to voluntarily stop marketing medically-important antibiotics for growth promotion in animals, and requiring antibiotics to be administered to livestock under veterinary oversight by 2017. Unfortunately, the FDA's voluntary guidance still condones the routine use of antibiotics for disease prevention. Because "growth promotion" and "routine disease prevention" uses overlap significantly, the agency's plan is unlikely to result in major reductions in antibiotic use by the livestock industry.³⁵

In June 2015, the Obama administration published a National Action Plan for Combating Antibiotic-Resistant Bacteria.³⁶ Unfortunately, with respect to antibiotic use in meat production, it does little more than reiterate the FDA's weak plan, repeating the same loophole for "disease prevention" uses of antibiotics.

Use of Other Growth-Promoting Drugs

In the meat industry, antibiotics are routinely used for growth promotion purposes, with the goal of stimulating rapid weight gain in animals with the least amount of feed. Curbing the routine use of antibiotics will not automatically eliminate the industrial meat industry's emphasis on fast growth rates, and there are a number of other drugs on the market that have similar growth promotion effects. Hormones and beta-agonists are already widely used in American animal agriculture.³⁷ As restaurants make progress restricting routine use of antibiotics, producers may increase use of other growth-

promoting drugs to compensate for slower animal growth rates. Hormone and beta-agonist use poses known animal welfare concerns and carries potential human health risks.

Hormones and Beta-Agonists

The beef industry uses six hormones to promote faster growth and weight gain—three naturally-occurring hormones (estradiol, progesterone, and testosterone) and three synthetic hormones (zeranol, melengestrol acetate, and trenbolone acetate).³⁸ The full human health risks from hormone residues in beef are still emerging. However, human and animal studies have demonstrated that environmental exposure to hormones, even at very low levels, can interfere with natural hormone levels in the body and with hormone function, linked to adverse reproductive and other health outcomes.³⁹ U.S. standards for acceptable dietary intake (ADI) levels of one synthetic hormone, zeranol, are more than two and half times higher than the international standards set by the Codex Alimentarius.⁴⁰ Numerous studies have found potential links between zeranol intake and heightened risk for breast cancer.⁴¹

Despite a lack of definitive data, concerns about harmful effects from low levels of hormone exposure prompted the European Food Safety Authority (EFSA) to ban use of these hormones in beef production in Europe in 1989.⁴² And in 2007, after a review of available scientific evidence, the EFSA concluded there is “convincing evidence for an association between the amount of red meat consumed and certain forms of hormone-dependent cancers.”⁴³ The American Public Health Association opposes use of hormone growth promoters in beef, citing the precautionary principle, and urges an end to their use in food production.⁴⁴

Ractopamine and zilpaterol are synthetic beta-agonist (or beta-adrenergic) drugs commonly given to cattle, pigs, and turkeys in feed rations at the “finishing” stage to encourage increase in muscle mass and carcass weight before slaughter. Multiple studies have shown that ractopamine contributes to increased numbers of “downer” animals, a term for animals that cannot walk or stand on their own due to illness or injury.⁴⁵ Ractopamine is linked to significant

health problems and behavioral changes in animals, such as cardiovascular stress, muscular skeletal tremors, increased aggression, hyperactivity and acute toxicity.⁴⁶ Use of zilpaterol, a stress-mimicking beta-agonist administered to cattle, has likewise been linked to “downer” animals⁴⁷ and in 2013, Tyson Foods announced it would no longer accept Zilmax-fed cattle at their plants due to animal welfare concerns.⁴⁸

Ractopamine residues are widely present in our food supply: a recent Consumers Union study tested approximately 240 pork products for ractopamine, and found residual amounts of the drug in about one-fifth of the samples tested.⁴⁹ The USDA conducts regular, but insufficient testing. In 2010, for example, the agency failed

Survey Responses on Growth Promoters

In addition to questions regarding antibiotics use policies, we asked top chain restaurants if they have policies prohibiting use of hormones and/or beta-agonist growth promoters in their meat and poultry supply chains (though these responses were not included in scorecard scores):

- ❖ Of the 25 restaurant chains surveyed, only Panera and Chipotle reported policies restricting the use of growth promoters, including hormones and/or beta-agonists (ractopamine or zilpaterol). Panera reports having strict policies against the use of beta-agonists and reports that most of its beef comes from suppliers that do not use hormones. Chipotle reports that it has policies prohibiting the use of both hormones and beta-agonist growth promoters in their supply chain.
- ❖ Denny’s reports that more than 60 percent of its hamburger meat comes from Australia and/or New Zealand, where beef production roughly 60 percent of beef is produced without added hormones. However, the company states that it does not track its beef supply to the farm and the authors of this report have no way of verifying what share, if any, of Denny’s beef meets this standard.

to conduct a single test on 22 billion pounds of pork, and tested only 712 samples from 26 billion pounds of beef.⁵⁰ Although studies on the human health effects of ractopamine are limited, preliminary data reviewed by the EFSA shows that ractopamine may cause elevated heart rates and heart-pounding sensations in humans, and that the drug may be more risky for people with heart issues.⁵¹

Availability of Organic and Grass-Fed Alternatives

Many consumers seek certified organic meat and poultry, as well as grass-fed beef, because of concerns about the food safety, health, animal welfare and environmental impacts associated with meat from conventional industrial facilities.⁵² Under the U.S. Department of Agriculture's (USDA) organic standard, antibiotics use is highly limited; animals can be treated with antibiotics, but treated animals cannot be sold under the organic label. Use of hormones or other growth promoters under

the organic standard also is prohibited. Beef labeled "grass-fed" comes from cattle raised on pasture and fed a diet of grass, hay and forage instead of being fattened by grain in confined feedlots. Although routine antibiotics use is not prohibited under the USDA definition of "grass-fed,"⁵³ antibiotics are not generally used in grass-fed production systems. Independent grass-fed certification systems, such as the American Grassfed Association and Animal Welfare Approved prohibit routine use of antibiotics and growth hormones.⁵⁴

We asked top restaurants about the availability of these alternative meat options on their menus:

- ❖ Despite the growing market for grass-fed beef, only two of the top U.S. restaurant chains reported serving grass-fed options. Panera has indicated that more than 80 percent of its steak (the chain's only beef offering) is grass-fed. Chipotle reports sourcing between 25 and 50 percent of its beef from grass-fed sources.

Honorable Mentions

Many growing smaller or regional restaurant chains are responding to consumer preferences by offering meat raised without routine use of antibiotics and other drugs. Some also offer organic and grass-fed alternatives. These restaurant chains were not surveyed, as they are not among the largest 25.

While not a comprehensive list, here are a few worthy of a shout out:

Shake Shack - This New York City-based chain, which recently went public, reports sourcing only meat raised without antibiotics or hormones. Shake Shack operates 63 restaurants in the U.S. and abroad (36 domestic locations).⁵⁵

Elevation Burger - This company, with over 50 locations in the U.S. and abroad and plans to add 15 new locations in 2015,⁵⁶ reports sourcing 100 percent organic meat, including beef, chicken and pork; all beef served reportedly is grass-fed.⁵⁷

BurgerFi - This chain's 67 locations around the U.S. reportedly all source grass-fed beef raised without antibiotics or hormones.⁵⁸

Burgerville - This Oregon and Washington-based chain with 40 restaurants reportedly sells all chicken, beef, pork and turkey raised without antibiotics or hormones.⁵⁹

BGR - With 22 locations across the south and eastern U.S., this chain reports that it sources beef raised without hormones or antibiotics.⁶⁰

Farmer Boys - This California-based chain reportedly sources beef without hormones or antibiotics at its 79 restaurants throughout California and Nevada.⁶¹

Pret A Manger - The vast majority of this chain's restaurants are abroad, but it reports that the chicken, turkey, and pork products at its 40+ US locations are all raised without routine use of antibiotics.⁶²

Good Times Burger - This chain with 37 locations in Colorado and Wyoming reportedly serves chicken and beef raised without antibiotics; its beef is also not treated with hormones or steroids.⁶³

Carl's Jr. - This restaurant recently became the first national chain to add a burger to its menu that is reportedly grass-fed and raised without antibiotics, hormones or steroids.⁶⁴

- ❖ None of the top restaurant chains reported serving organic meat or poultry, though Panera and Chipotle both have organic vegetarian options on their menus.

While sales of meat and poultry raised without routine use of antibiotics still account for a small share of total meat sales in the U.S., their growth trajectory is transforming the broader marketplace. Between 2009 and 2012, sales rose by 25 percent, and the trend continues today.

The Business Case for Action

Numerous surveys show consumers increasingly want better meat options. According to a Consumer Reports survey, 86 percent of consumers said that meat raised without antibiotics should be available in their local supermarket — and more than 60 percent said they would be willing to pay at least \$0.05 per pound more for it. Nearly 40 percent said they would pay at least \$1 more per pound.⁶⁵

While sales of meat and poultry raised without routine use of antibiotics still account for a small share of total meat sales in the U.S., their growth trajectory is transforming the broader marketplace. Between 2009 and 2012, sales rose by 25 percent,⁶⁶ and the trend continues today.⁶⁷

USDA certified organic meats (just one segment of the market for meat raised without antibiotics), was the fastest growing segment of the \$31 billion organic foods industry in 2011.⁶⁸ According to SPINS market data, leading brands with certified organic and grass-fed product labels (another key segment of the market for meat raised without routine use of antibiotics) grew by 80 percent from 2012-2014.⁶⁹ A 2015 analysis of top food trends noted that one-third of consumers bought organic meat/poultry in 2013. Amongst the top three reasons given was to avoid hormones or antibiotics.⁷⁰

In many surveys, consumers also express concern about hormone residues in animal products. In a 2014 survey by the University of Florida Public Issues Education Center, 88 percent of respondents were concerned about hormones in food, with 29 percent of those expressing “extreme worry.”⁷¹ A recent study by Fortune magazine and Survey Monkey found that 56.5 percent of consumers were concerned about hormones.⁷² This concern has translated into a 10 percent rise from 2012-2013 in sales of meat brands with no added hormones⁷³ and, as noted, has contributed to the rapid growth in the market for organic meat, which is raised without added hormones or other growth promoters.



While neither company currently has a reported policy prohibiting the routine use of antibiotics in meat production, both Subway and Wendy’s are currently testing the sale of chicken raised without antibiotics at select restaurants due to increased customer interest. Subway’s chicken raised without antibiotics has been spotted in Southern California,⁷⁴ and Wendy’s is testing markets in Orlando and Gainesville, Fla., Kansas City, Mo., and Austin, Tx.⁷⁵ These companies should take the next step and adopt policies prohibiting the routine use of antibiotics in all of their chicken nationwide.



Raised Without Routine Antibiotics — A Growing Trend

The market for meat and poultry raised without routine use of antibiotics is booming. The chicken industry, in particular, appears to be at a tipping point. Consumer demand for either poultry raised without routine use of antibiotics or organic poultry products is driving market change.⁷⁶ In 2014, the *Wall Street Journal* reported that “sales of [antibiotic-free] chicken at U.S. retailers rose 34 percent by value” and that consumer spending on such chicken topped \$1 billion in 2013, not including restaurant and other commercial purchasing.⁷⁷

The largest chicken producers are responding, both to retail consumers and their largest customers in the restaurant industry. Consider the following:

- ❖ In April 2015, Tyson Foods, the country’s largest processor of chicken and a major supplier to McDonald’s, announced it will eliminate the use of human antibiotics for raising chickens in its U.S. operations by September 2017.⁷⁸
- ❖ Following McDonald’s announcement, Keystone Foods, a major supplier to the chain, stated that it “fully supports McDonald’s decision and direction regarding poultry antibiotic usage... Keystone is positioned to support and grow our business with both McDonald’s and our existing customers with minimal impact to our operations.”⁷⁹
- ❖ In June 2015, Foster Farms Co., which processes more than a million chickens a week, announced efforts to eliminate use of antibiotics that are important for human medicine in its chicken production.⁸⁰
- ❖ Pilgrim’s Pride, the nation’s second largest chicken producer—and a major supplier to KFC—committed to raising 25 percent of its birds without drugs by the end of 2018. A representative of the company told the *Wall Street Journal*, “We’re seeing quite a big growth in antibiotic-free product. As consumers and as the population is looking more for that, the industry needs to follow.”⁸¹
- ❖ In 2014, Perdue Farms, the fourth largest chicken producer in the U.S., announced that it is already raising 95 percent of its chickens without antibiotics that are important to human medicine, with the remaining use limited to treating chickens that are sick.⁸² In July 2015, Perdue announced that more than half of their birds are raised completely without antibiotics.⁸³

Conclusion



Top U.S. restaurant chains have a unique opportunity and responsibility to help tackle the antibiotic resistance crisis by using their considerable purchasing power to shift production towards meat and poultry raised without the routine use of antibiotics.



The routine use of antibiotics in livestock for growth promotion and disease prevention is a clear threat to public health. Top U.S. restaurant chains have a unique opportunity and responsibility to help tackle the antibiotic resistance crisis by using their considerable purchasing power to shift production towards meat and poultry raised without the routine use of antibiotics. Antibiotics should only be used to treat sick animals, not as a substitute for better livestock management practices.

Eliminating the routine use of antibiotics in animal agriculture is an important step towards

creating a healthier food system that addresses one of our nation's most pressing public health threats, alongside larger problems of industrial livestock production and animal welfare. Fortunately, growing consumer demand for meat produced without the routine use of antibiotics and other growth promoting drugs is transforming the marketplace. Companies that show true leadership by responding to these consumer preferences and adopting strong antibiotics use policies stand to be rewarded by their customers, while others risk being left behind.



Although routine antibiotics use is not prohibited under the USDA definition of “grass-fed,” antibiotics are not generally used in grass-fed production systems.

Recommendations

Restaurants

Top U.S. chain restaurants should take cues from the success of companies like Chipotle and Panera and use their considerable purchasing power to make meat and poultry produced without the routine use of antibiotics more readily available to consumers. The industry should also take note of important commitments on antibiotics use in chicken from mainstream companies like Chick-fil-A and McDonald’s. The next step is for McDonald’s to adopt similar policies for the pork and beef served in its restaurants and for large chains such as Subway, Burger King, Wendy’s and KFC to publicly commit to working with their meat and poultry suppliers to end the routine use of antibiotics.

Restaurant chains should also play a role in encouraging their suppliers to improve management practices in their facilities. Reduced crowding, more hygienic conditions, better diets and longer weaning periods, among other changes, improve animal welfare and reduce the likelihood of disease and the need for routine antibiotics use for prevention.⁸⁴

Consumers

Your choice and your voice matter. You can support farmers that raise animals without the routine use of antibiotics and choosing restaurants that offer better meat options for you and your family. You can also consult resources such as the [Eat Well Guide](#) to find local restaurants that buy more sustainably-produced meat. Wherever you eat, ask

restaurant managers about their meat sourcing policies and practices and make sure they know that you’re looking for options that are healthier for you, animals and the environment—including meat produced without the routine use of antibiotics and other drugs. You can also visit the websites and social media pages of top restaurant chains and leave comments asking them to switch to meat raised without the routine use of antibiotics and other drugs. A summary of company policies and links to restaurant webpages are found in Appendix 3. As more consumers demand better meat options, they will become more widely available. Remember: it’s your money, your health and your future.

Federal policy

The market alone cannot solve the problem of antibiotic misuse in animal agriculture. The FDA must move quickly to adopt mandatory policies that prohibit use of medically important antibiotics for both growth promotion and disease prevention. The agency must also create greater transparency by mandating the collection of information on antibiotic use by livestock producers in order to demonstrate that their policies are leading to meaningful reductions in the use of medically important antibiotics in livestock production. Congress must also act by passing the Preservation of Antibiotics for Medical Treatment Act, which has been endorsed by 450 health, agriculture, environmental, food safety and nutrition, animal protection, religious, labor, and consumer advocate groups.⁸⁵

Appendix 1 Survey Questions

Survey on Restaurant Meat Procurement Policies and Antibiotics

1. Do you have a published policy regarding the use of antibiotics in your meat supply?

Yes ____ No ____

2. If the answer to #1 is yes, then:

a. Does the policy:

1. Prohibit the routine use of *all* antibiotics for disease prevention and growth promotion? (i.e. no antibiotics are ever used or they are used only to treat sick animals or for non-routine disease control)

Yes ____ No ____

2. Prohibit the routine use of antibiotics in classes *used in human medicine* (i.e. no medically important antibiotics are ever used or they are used only to treat sick animals or for non-routine disease control)

Yes ____ No ____

b. Please indicate which classes of meat your policy applies to and roughly what percentage of your meat is currently sourced under this policy:

	Policy Applies	% of meat sourced following policy
all meat?	_____	_____
poultry?	_____	_____
pork?	_____	_____
beef?	_____	_____

c. Is the policy available on line? If so, please provide the URL:

If not, please provide the policy via email.

d. Do you have third party audits to verify compliance with this policy?

Yes ____ No ____

If yes, please provide details regarding frequency and whether your entire meat supply chain is covered?

Please provide the name of your auditors:

Appendix 1 Survey Questions (continued)

3. If the answer to #1 is no, then do you have plans to develop and implement a policy in the future? Please describe, including expected date of the policy.

4. Do you have a policy prohibiting the use of non- antimicrobial growth promoters (e.g. ractopamine or zilpaterol) in your meat supply?

Yes ____ No ____

- a If yes, please indicate which classes of meat your policy applies to and roughly what percentage of your meat is currently sourced that follows this policy:

	Policy Applies	% of meat sourced following policy
all meat?	_____	_____
turkey?	_____	_____
pork?	_____	_____
beef?	_____	_____

- b If yes, is the policy available on line? If not, please provide the policy

5. Do you have a policy prohibiting the use of hormones in your beef supply? What percentage of your beef is sourced from beef raised without hormones?
6. If you answered no to #4 or #5, do you have plans to implement a policy in the future? Please describe, including expected date of the policy.
7. Do you serve any 100% grass-fed beef items? If so, what percentage of your meat offerings are grass-fed?

Appendix 1 Survey Questions (continued)

8. Do you offer any certified organic items? If so, what percentage of your meat offerings are organic?

% of meat sourced organic

poultry?	_____	_____
pork?	_____	_____
beef?	_____	_____

9. What factors currently limit or prevent additional offerings of meat and poultry raised without antibiotics and/or growth promoters at your restaurants?

10. Is there anything else you would like to tell us about your efforts to improve social and environmental responsibility in your supply chain?

Thank you very much! If you have questions regarding this survey, please contact Kari Hamerschlag at Friends of the Earth khamerschlag@foe.org 510-900-3150



Appendix 2 Antibiotics Use Policies & Sourcing Practices: Criteria

		Criteria	Max points allotted
Antibiotics Use Policies	Good Policy	<ul style="list-style-type: none"> Company policy (based on “Reported Information”*) prohibits routine use of all antibiotics for disease prevention and growth promotion OR prohibits the routine use of antibiotics in classes used in human medicine 	10
	Policy applies to all types of meat**	<ul style="list-style-type: none"> Reported information (as defined below) applies to purchased chicken, turkey, pork and beef = 2 points each 	8
Implementation	Estimated availability of meat produced without routine ABX ***	<ul style="list-style-type: none"> Time bound commitment on 1 species= 1 point Time bound commitment on 2 species= 2 points At least 20% meat and poultry currently served= 3 points 25-50%=5 points 50-75%= 6 points 75-90% = 7 points 90-100%= 8 points 	8
Transparency	Third party audits	<ul style="list-style-type: none"> Company works with third party auditors; or suppliers that have third party audits for entire supply chain; shares name of third party audits/certifications= 4 points Annual audits to comply with standards (internal or external); some external and third party auditing= 3 points Mentions audits as a component of policy= 2 points 	4
	Policy online	<ul style="list-style-type: none"> A published policy was found online regarding the use of antibiotics in meat supply 	3
	Responded to survey	<ul style="list-style-type: none"> Responded to survey questions 	3
TOTAL ELIGIBLE POINTS			36

* As used throughout this report, “Reported Information” is information concerning companies’ antibiotics and other policies and sourcing practices that come from companies’ responses to the survey, follow up emails, public statements made by the companies, and/or efforts by the report’s authors to locate such policies online.

** While the survey did not explicitly distinguish between chicken and turkey, for the few companies that responded to the survey, we elicited the species-specific information in follow up correspondence.

*** These are estimated percentages as determined by the report’s authors and based on Reported Information, as described above.

Grading: The final grade awarded to companies is based on a percentage calculation of total points earned out of total possible points, not simply an aggregate point score. Because different restaurant chains feature different menus, the authors did not want to penalize those restaurants that exclusively or primarily offer only one type of meat (for example, chicken or beef), or do not serve a certain type of meat (for example, turkey). As a result, for each restaurant, we calculated a total number of possible points, based on that restaurant’s menu offerings. The percentage total then allowed us to more equitably compare restaurants to one another.

Grade Scale:	
85-100%	A
70-84%	B
55-69%	C
40-54%	D
39% or below	F

Scoring Criteria

Category #1: Antibiotics Use Policies

In this year's scorecard, given how few companies have reported policies in place to limit routine use of antibiotics in their meat and poultry supply chains, the report authors chose to place greatest emphasis on the establishment of strong antibiotics use policies. In future scorecards, as more companies adopt policies, we anticipate placing greater emphasis on implementation by increasing the relative number of points awarded for actually serving meat raised without routine antibiotics use. Our goal over time is to encourage companies to not only adopt strong antibiotics use policies, but to use their considerable purchasing power to source and serve meat according to those policies.

Policy: Companies score the full 10 points only if they have adopted and disclosed a policy that **prohibits routine use of medically important¹ antibiotics for growth promotion** (to make animals put on weight faster) **and for disease prevention** (to compensate for poor farm management practices that increase disease risk), or if companies have "no antibiotics ever" policies. Companies are not penalized for policies that allow for the use of antibiotics to treat sick animals.

If a restaurant chain did not respond to our survey and we were unable to locate a publicly available antibiotics use policy, for the purposes of the scorecard we assume that the restaurant chain has no such policy and it scores a zero in this category. If a company's published policy or other Reported Information² does not specifically disallow antibiotics use for routine disease prevention then we infer that routine disease prevention is consistent with that policy or Reported Information. The published Burger King policy states, for example, that "Our suppliers may not use antibiotics solely for growth-promotion purposes such as feed

efficiency or weight gain;"² we infer, therefore, that routine antibiotics use for disease prevention is consistent with this policy, and Burger King's policy therefore gets 0 points. Similarly, because Reported Information for Subway includes attributed statements that the company is "targeting to transition to chicken raised without antibiotics important to human medicine in 2016," along with other statements on its website, Subway is awarded partial credit for a good policy, but less than full credit for the lack of clarity, timeline, and firm commitment in these statements.

Types of meat covered: Companies are scored on whether their antibiotics use policy applies to all, or just some, of the different kinds of meats that the company serves (chicken, turkey, pork and/or beef). If a company's Reported Information does not cover a particular species, but its primary supplier of that species has a policy prohibiting routine antibiotics use, the company receives partial credit (as long as it provides ample information about its primary supplier's policies and practices).

In this year's scorecard, we have chosen to give equal points for antibiotics use policies that apply to chicken, turkey, pork or beef. We have evaluated policies and implementation as they apply to each of the four meat categories a company serves, even if one or more does not feature prominently on their menu (for example, is offered only as part of a main item—i.e. bacon on a cheeseburger—or a single menu item). In future surveys, we may seek more information on the volume of different meats served in order to weight scores accordingly.

Category #2: Implementation

Estimated availability of meat served in restaurants produced without the routine use of antibiotics: A maximum of 8 points are available in this category. Companies receive 1-2 points if they have a publicly stated time bound commitment (e.g. a specific date) to purchase

1 Refers to antibiotics in classes considered important for human medicine (e.g., penicillins and tetracycline). However, routine use of antibiotics unrelated to human medicine can also be used to compensate for poor farm management. Ideally, animals would be raised in ways that do not rely on any antibiotics as a substitute for better overall health and living conditions for animals, whether important in human medicine or not.

2 "Reported Information" concerning companies' antibiotics policies and sourcing practices comes from companies' responses to the survey, follow up emails, public statements made by the companies, and/or efforts by the report's authors to locate such policies online.



meat and/or poultry that adhere to the Category #1 antibiotics policy. When the percentage of the total meat and poultry currently served by a restaurant chain is either reported by the company or estimated by the report's authors to meet or exceed 20%, three points may be earned. Additional points are awarded as higher thresholds of policy implementation are achieved. Estimates are determined based on a company's Reported Information. Companies score higher if they already source a high percentage of their meat and/or poultry under this policy. A company need not source 100% of a particular species of meat to score highly in the category.

Category #3: Transparency

Third-party audits: A total of 4 points can be earned in this sub-category, reflecting the importance of regular, independent audits to ensure a company's policies are being followed. A company merely mentioning audits as a component of its antibiotics policy earns two points. An additional point is earned if there are

annual audits (internal or external) to comply with that company's antibiotics standards, or, alternatively if there is some external and/or third party auditing. The maximum 4 points are earned when a company works with third party auditors; when it sources from meat suppliers that have third party audits for their entire supply chain; and/or when the company shares the name of third party auditors/certifications.

Policy online: Companies are rewarded for transparency, and earn the full 3 points in this sub-category, if they have published an antibiotics use policy online — even if that policy does not meet our standard (e.g., Wendy's, which has a policy on its website that restricts the use of antibiotics for growth promotion but not disease prevention gets full points in this category). Less than three points may be given if the company has provided minimal online information.

Responded to survey: Simply responding to our survey, verbally or in writing, earns the full 3 points, regardless of the answers provided.

Appendix 3 Company Profiles

Information in this Appendix concerning company ownership, number of restaurant locations and sales of fast food restaurant companies comes from QSR Magazine, The QSR 50, August 2014.¹ Information from companies included in the survey but not in the QSR article—including Applebee's, IHOP, Olive Garden, Chili's, Outback Steakhouse and Denny's—is from other, referenced sources.

As used throughout this report, “Reported Information” concerning companies’ antibiotics policies and other policies comes from companies’ responses to the survey, follow up emails, public statements made by the companies, and/or efforts by the report’s authors to locate such policies online. The report’s authors encourage restaurant chains to contact them directly with additional information concerning antibiotics and/or meat sourcing policies, and to make such information publicly available.

1. McDonald's

Owned by: McDonald's Corporation (NYSE: MCD)

Corporate headquarters: 2111 McDonald's Drive, Oak Brook, IL 60523

CEO: Stephen J. “Steve” Easterbrook

Number of U.S. locations: 14,339

2013 U.S. Sales: \$35.86 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors:

Published policy: http://www.aboutmcdonalds.com/content/dam/AboutMcDonalds/Sustainability/Antimicrobial_Stewardship_Vision.pdf

Antibiotics (U.S.): McDonald's 2015 policy is to be fully implemented in two years, by 2017. An excerpt includes: “While McDonald's will only source chicken raised without antibiotics important to human medicine, the farmers who supply chicken for its menu will continue to responsibly use ionophores, a type of antibiotic not used for humans that helps keep chickens healthy.”²

Third Party Audits: An excerpt of the 2015 policy relevant to audits includes: “McDonald's will verify antimicrobial use in supply chains where we have dedicated supply (supplier relationships and supply chain visibility of the animals/birds). Dedicated suppliers will maintain records of antimicrobial use and document compliance which will be verified by third party audits. Where we don't have dedicated supply, we will work within each area of the world with stakeholders, including suppliers, industry partners, government agencies, NGOs, veterinary and university extension networks, and other retailers to gain alignment on expectations and developing timelines for implementation and verification criteria that would reduce the use of medically-important antimicrobials in food animals.”³

Hormones/Growth Promoters: Not found.

Organic/Grass-Fed Options: Not found.

Responded to Survey: No.

1 Accessed July 30, 2015 at <http://www.qsr magazine.com/reports/qsr50-2014-top-50-chart>.

2 <http://news.mcdonalds.com/press-releases/mcdonald-s-usa-announces-new-antibiotics-policy-and-menu-sourcing-initiatives-nyse-mcd-1179405>

3 http://www.aboutmcdonalds.com/content/dam/AboutMcDonalds/Sustainability/Antimicrobial_Stewardship_Vision.pdf.

Appendix 3 Company Profiles (continued)

2. Subway

Owned by: Doctor's Associates, Inc.

Corporate headquarters: 325 Bic Drive, Milford, CT 06461

CEO: Frederick "Fred" DeLuca

Number of U.S. locations: 26,427

2013 U.S. Sales: \$12.74 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: While Subway did not complete the survey, the company's website was recently amended (on or around August 25th, 2015) to include the statement that "We support the elimination of sub-therapeutic use of antibiotics. Elimination will take time and we continue to work with our suppliers to reach that goal." Recent news stories are potentially contradictory in quoting an unnamed Subway spokesperson as having issued a statement that: "We have been working toward the elimination of antibiotics, as are many other companies, which makes securing supply challenging for a chain our size." But "we cannot provide a date when all the work will get done as the demand is somewhat higher than supply right now. However, we are targeting to transition to chicken raised without antibiotics important to human medicine in 2016."¹ Despite numerous online searches and direct communications to the company, efforts have been unsuccessful in clarifying whether this is an actual company policy that applies to all of its meats, and/or when such a goal will actually be implemented. Subsequent communication directly with Subway to clarify the potential contradictions in these statements have been unsuccessful. Nor is it yet clear whether the website's reference to elimination of "subtherapeutic" means the end of all routine use. It is also unclear whether this is an actual company policy that applies to all of its meats and/or when such a goal will actually be implemented. For all of these reasons, as explained in greater detail above, the company earns a score that leads to an F grade in the scorecard.

Responded to Survey: No.

3. Starbucks

Owned by: Starbucks Corporation (NASDAQ: SBUX)

Corporate headquarters: 2401 Utah Avenue South, Seattle, WA 98134

CEO: Howard Schultz

Number of U.S. locations: 11,438

2013 U.S. Sales: \$11.72 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors:

Published policy: <http://globalassets.starbucks.com/assets/313ef95924754048b3ca8cea3cc2ff90.pdf>

Antibiotics: One current area of focus is "Supporting responsible use of antibiotics to support animal health."²

Third Party Audits: Not found.

Hormones/Growth Promoters: One current area of focus includes "eliminating the use of artificial growth hormones, and for poultry, fast growing practices."³

1 Jennings, L. (2015, Aug 28). Subway plans shift to antibiotic-free meat. Nation's Restaurant News. Retrieved on 3 September 2015 from <http://nrn.com/health-nutrition/subway-plans-shift-antibiotic-free-meat>.

2 <http://globalassets.starbucks.com/assets/313ef95924754048b3ca8cea3cc2ff90.pdf>

3 <http://globalassets.starbucks.com/assets/313ef95924754048b3ca8cea3cc2ff90.pdf>

Appendix 3 Company Profiles (continued)

3. Starbucks (continued)

Organic/Grass-fed options: Not found.

Responded to Survey: No.

4. Wendy's

Owned by: The Wendy's Company (NASDAQ: WEN)

Corporate headquarters: 1 Dave Thomas Boulevard, Dublin, OH 43017

CEO: Emil Brolick

Number of U.S. locations: 5,791

2013 U.S. Sales: \$8.79 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors:¹

Published policy: <https://www.wendys.com/en-us/about-wendys/animal-welfare-program>

Antibiotics: Wendy's Antibiotic Use Policy "strictly prohibits the use of antibiotics that are medically important to humans for the sole purpose of growth promotion."² And states: "We believe that antibiotics used in livestock and poultry should only be used for the prevention, control and treatment of disease."³ Suppliers to Wendy's are required to adhere to the Wendy's Antibiotic Use Guidelines, which state that "[g]ood hygiene, nutrition, biosecurity programs, and immunization should be employed as the primary disease prevention strategies rather than antibiotic therapy, and that require antibiotics used to treat food animals to be administered under the auspices of a licensed veterinarian."

Third Party Audits: To ensure supplier compliance, suppliers undergo regular audits by trained Wendy's Quality Assurance representatives and third party consultants to verify conformance to policy requirements.

Hormones/Growth Promoters: Not found.

Organic/Grass-fed options: Not found.

Responded to Survey: Yes.

5. Burger King

Owned by: Restaurant Brands International (NYSE:QSR)

Corporate headquarters: 5505 Blue Lagoon Drive, Miami, FL 33126

CEO: Daniel S. Schwartz

Number of U.S. locations: 7,155

2013 U.S. Sales: \$8.50 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors:

Published policy: http://burgerking.pl/cms/en/us/cms_out/digital_assets/files/pages/BK_CR_Report_Environment.pdf

1 <https://www.wendys.com/en-us/about-wendys/animal-welfare-program>.

2 Ibid.

3 http://burgerking.pl/cms/en/us/cms_out/digital_assets/files/pages/BK_CR_Report_Environment.pdf

Appendix 3 Company Profiles (continued)

5. Burger King (continued)

Antibiotics: Burger King’s antibiotics policy states that “Our vendors and suppliers may use antibiotics only under the supervision of a licensed veterinarian and only in full compliance with all applicable regulatory requirements. Our suppliers may not use antibiotics solely for growth-promotion purposes such as feed efficiency or weight gain.”³

Third Party Audits: Not found

Hormones/Growth Promoters: Not found.

Organic/Grass-fed options: Not found.

Responded to Survey: No.

6. Taco Bell

Owned by: Yum! Brands, Inc. (NYSE: YUM)

Corporate headquarters: 1 Glen Bell Way, Irvine, CA 92618

CEO: Brian Niccol

Number of U.S. locations: 5,921

2013 U.S. Sales: \$7.80 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found

Responded to Survey: No.

7. Dunkin’ Donuts

Owned by: Dunkin’ Brands

Corporate headquarters: 130 Royall Street, Canton, MA 02021

CEO: Nigel Travis

Number of U.S. locations: 8,082 U.S.

2013 U.S. Sales: \$6.70 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors:¹

Published policy: http://www.dunkinbrands.com/internal_redirect/cms.ipressroom.com.s3.amazonaws.com/226/files/20150/Animal%20Welfare%20Policy%20for%20website.pdf

Antibiotics: Dunkin’ Donuts’ published policy states: “Antibiotic/Antimicrobial Use: Suppliers should only administer antibiotics and antimicrobials to animals for the control and treatment of disease. We prohibit suppliers from using medically important antibiotics or antimicrobials in healthy animals.”² In email communication, Dunkin’ Donuts acknowledged that they are still working with their suppliers to implement this policy but have not made public a timeline for implementation.³

Third Party Audits: Dunkin’ Donuts informed us they do not use third party audits to verify compliance with aforementioned antibiotics policy.

1 Unless otherwise noted, information obtained from company survey responses.

2 http://www.dunkinbrands.com/internal_redirect/cms.ipressroom.com.s3.amazonaws.com/226/files/20150/Animal%20Welfare%20Policy%20for%20website.pdf

3 Personal communication by email from Anne Fajon to Steven Roach, May 13, 2015.

Appendix 3 Company Profiles (continued)

7. Dunkin' Donuts (continued)

Hormones/Growth Promoters: Not found.

Organic/Grass-fed options: Not found.

Responded to Survey: Yes.

8. Pizza Hut

Owned by: Yum! Brands, Inc. (NYSE: YUM)

Corporate headquarters: 7100 Corporate Drive, Plano, TX 75024

CEO: David Gibbs, CEO

Number of U.S. locations: 7,863

2013 U.S. Sales: \$5.70 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

9. Chick-fil-A

Owned by: Chick-fil-A, Inc.

Corporate headquarters: 5200 Buffington Road, Atlanta, GA 30349-2998

CEO: Dan Cathy

Number of U.S. locations: 1,900+

2013 U.S. Sales: \$5.05 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors:¹

Published policy: <http://inside.chick-fil-a.com/no-antibiotics-ever-commitment-update/>

Antibiotics: Chick-fil-A's reported policy prohibits the routine use of all antibiotics, including ionophores, for disease prevention and growth promotion (i.e. no antibiotics are ever used). Within five years, Chick-fil-A reports that it expects that all of their chicken will be raised without any antibiotics, and is currently on track with 20% of their chicken meeting this criterion.

Third Party Audits: Chick-fil-A is the first restaurant to partner with the USDA to establish a verification process to ensure suppliers are meeting their requirements. Through their No Antibiotics Ever certification, Chick-fil-A requires suppliers to undergo a USDA audit. After the certification is obtained, the company uses a third-party auditor twice a year for each of their chicken suppliers.

Hormones/Growth Promoters: Not found.

Organic/Grass-fed options: Chick-fil-A does not offer organic options at this time.

Responded to Survey: Yes

¹ Unless otherwise noted, information obtained from company survey responses.

² DineEquity Announces Year-End Results for Applebee's and IHOP, February 26, 2014, Full Service Restaurants, accessed July 31, 2015: <https://www.fsrmagazine.com/finance/dineequity-announces-year-end-results-applebees-and-ihop>

Appendix 3 Company Profiles (continued)

10. Applebee's Neighborhood Grill and Bar

Owned by: DineEquity: (NYSE: DIN)

Corporate headquarters: 8140 Ward Parkway, Kansas City, MO 64114

President: Steven Layt

Number of U.S. locations: 1,861

2013 U.S. Sales: \$4.48 billion²

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

11. KFC

Owned by: Yum! Brands, Inc. (NYSE: YUM)

Corporate headquarters: 1441 Gardiner Lane, Louisville, KY 40213

CEO: Muktesh "Micky" Pant

Number of U.S. locations: 4,370

2013 U.S. Sales: \$4.30 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

12. Panera Bread

Owned by: Panera Bread Company (NASDAQ: PNRA)

Corporate headquarters: 3630 S Geyer Road #100, St. Louis, MO 63127

CEO: Ronald Shaich

Number of U.S. locations: 1,658 U.S. stores

2013 U.S. Sales: \$4.28 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors:¹

Published policy: <https://www.panerabread.com/en-us/company/animal-welfare-infographic.html>

Antibiotics: Panera told us that none of its chicken, roasted turkey or pork is produced with the use of antibiotics. While almost 100 percent of the chicken and roasted turkey served in Panera salads and sandwiches are antibiotic-free, only a third of the deli turkey used on sandwiches and salads is currently produced without antibiotics. Its policy for beef is under review. Its primary beef supplier only provides meat that was raised without antibiotics, while its other beef supplier allows for treatment only when animals are sick.

Third Party Audits: Panera reports that an external third party auditor has been in use since 2005 to ensure the supply chain supports Panera's raised without antibiotics (RWA) program.

¹ Unless otherwise noted, information was obtained from company survey responses.

Appendix 3 Company Profiles (continued)

12. Panera Bread (continued)

Hormones/Growth Promoters: Panera reports that its policy banning hormones/growth promoters applies to all of its meat served; it has only been able to implement that policy with respect to 93 percent of the meat procured. While many of Panera's beef suppliers are committed to no hormones/growth promoters, the company's beef sourcing policy is currently under review.

Organic/Grass-fed options: In 2014, 80 percent of the beef served was grass-fed and able to roam freely and graze in pasture. The company anticipates 2015 beef purchases to meet or exceed this percentage. There are currently no certified organic meat products offered.

Responded to Survey: Yes.

13. Sonic

Owned by: Sonic Corp. (NASDAQ: SONC)

Corporate headquarters: 300 Johnny Bench Drive, Oklahoma City, OK 73104

CEO: J. Clifford Hudson

Number of U.S. locations: 3,522

2013 U.S. Sales: \$3.80 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

14. Domino's

Owned by: Domino's Pizza Inc. (NASDAQ: DPZ)

Corporate headquarters: 30 Frank Lloyd Wright Drive, Ann Arbor, MI 48105

CEO: J. Patrick Doyle

Number of U.S. locations: 4,986 U.S.

2013 U.S. Sales: \$3.80 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors:¹

Published policy: Not found.

Antibiotics: In response to the survey Domino's did not provide its own policy on antibiotics, but instead provided links to: a) an antibiotics policy by its supplier Tyson Foods; b) the website of its supplier, Koch Foods, which had no information on antibiotics use; and to c) a website describing antibiotic use in U.S. pig production by the National Pork Board, an industry-funded research and promotion program.

Third Party Audits: There are no third party audits to verify compliance.

Hormones/Growth Promoters: Not found.

Organic/Grass-fed options: Not found.

Responded to Survey: Yes.

¹ Unless otherwise noted, information was obtained from company survey responses.

Appendix 3 Company Profiles (continued)

15. Chili's Grill & Bar

Owned by: Brinker International Inc. (NYSE: EAT)

Corporate headquarters: 6820 Lyndon B Johnson Freeway, Dallas, TX 75240

CEO: Wyman Roberts

Number of U.S. locations: 1,269

2013 U.S. Sales: \$3.8 billion¹

Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

16. Olive Garden

Owned by: Darden Restaurants, Inc. (NASDAQ: DRI)

Corporate headquarters: 1000 Darden Center Drive, Orlando, FL 32837

President: David George

Number of U.S. locations: 834

2013 U.S. Sales: \$3.7 billion²

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

17. Chipotle

Owned by: Chipotle Mexican Grill Inc. (NYSE: CMG)

Corporate headquarters: 1401 Wynkoop Street #500, Denver, CO 80202

CEO: Steve Ells

Number of U.S. locations: 1,595

2013 U.S. Sales: \$3.17 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors:³

Published policy: <https://chipotle.com/food-with-integrity#saying-no-to-drugs>

Antibiotics: Chipotle reports that it prohibits the routine use of all antibiotics for disease prevention and growth promotion. Policy applies to over 90 percent of all of the meat served.

Third Party Audits: Includes a combination of in-house and contracted auditors to monitor compliance with their standards. In addition, all of their suppliers are required to have an internal audit program and schedule. Some suppliers are certified by independent third-party programs such as Global Animal Partnership and American Humane Certified.

¹ Chili's to Debut Waitlist Mobile App in Partnership with NoWait. (2015, April 22). Retrieved August 22, 2015, from <https://www.fsrmagazine.com/technology/chilis-debut-waitlist-mobile-app-partnership-nowait>

² Darden 2013 Annual Report accessed July 31, 2015: http://investor.darden.com/files/doc_financials/2013%20Annual%20Report.pdf

³ Unless otherwise noted, information obtained from company survey responses.

Appendix 3 Company Profiles (continued)

17. Chipotle (continued)

Hormones/Growth Promoters: Use of added hormones and non antimicrobial growth promoters (e.g. ractopamine or zilpaterol) are prohibited. More than 95% of pork and beef is raised without hormones or other growth promoters.

Organic/Grass-fed options: Depending on the supply and time period, anywhere between 25 to 50 percent of the beef is grass-fed.

Responded to Survey: Yes.

18. Jack in the Box

Owned by: Jack in the Box Inc. (NASDAQ: JACK)

Corporate headquarters: 9330 Balboa Ave. San Diego, CA 92123-1516

CEO: Leonard Comma

Number of U.S. locations: 2,251

2013 U.S. Sales: \$3.11 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

19. Arby's

Owned by: Roark Capital Group and The Wendy's Company

Corporate headquarters: 1155 Perimeter Center West, Atlanta, GA 30338

CEO: Paul Brown

Number of U.S. locations: 3,269

2013 U.S. Sales: \$3.03 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

20. Little Caesars Pizza

Owned by: Illitch Holdings, Inc.

Corporate headquarters: 2211 Woodward Avenue, Detroit, MI 48201

CEO: David Scrivano

Number of U.S. locations: 3,600+

2013 U.S. Sales: \$3.03 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

Appendix 3 Company Profiles (continued)

22. International House of Pancakes (IHOP)

Owned by: DineEquity (NYSE: DIN)

Corporate headquarters: 450 N. Brand Boulevard, 7th Floor, Glendale, California 91203

CEO: Julia Stewart

Number of U.S. locations: 1,564

2013 U.S. Sales: \$2.55 billion¹

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

23. Papa John's Pizza

Owned by: Papa John's International, Inc.

Corporate headquarters: 2002 Papa John's Boulevard, Louisville, KY 40299

CEO: John Schnatter

Number of U.S. locations: 3,207

2013 U.S. Sales: \$2.50 billion

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

24. Outback Steakhouse

Owned by: Bloomin' Brands Inc (NASDAQ: BLMN)

Corporate headquarters: 2202 N Westshore Boulevard #500, Tampa, FL 33607

President: Jeff Smith

Number of U.S. locations: 767

2013 U.S. Sales: \$2.46 billion²

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors: Not found.

Responded to Survey: No.

25. Denny's

Owned by: Denny's Corporation (public: DENN)

Corporate headquarters: 203 E. Main Street, Spartanburg, SC 29319

CEO: John C. Miller

Number of U.S. locations: 1,435

2013 U.S. Sales: \$2.34 billion³

1 DineEquity Announces Year-End Results for Applebee's and IHOP, February 26, 2014, Full Service Restaurants, accessed July 31, 2015: <https://www.fsrmagazine.com/finance/dineequity-announces-year-end-results-applebees-and-ihop>

2 Chudgar, S. (2014, August 1). FSR 50: The Numbers. Retrieved August 22, 2015, from <https://www.fsrmagazine.com/chain-restaurants/fsr-50-numbers>

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Appendix 3 Company Profiles (continued)

25. Denny's (continued)

Reported Information concerning meat sourcing as reported in disclosed policies, public statements, publicly available information or correspondence with the authors:²

Published policy: Not found.

Antibiotics: Denny's reported that it endorses the minimal guidelines set by the FDA, which discourages the use of medically important antibiotics for growth promotion.

Third Party Audits: No third party audits.

Hormones/Growth Promoters: While there is no policy prohibiting growth promoters such as ractopamine or zilpaterol in their meat supply, Denny's reports that 60% of their hamburger meat is from Australia or New Zealand, whose production it estimates is approximately 60% hormone free.

Organic/Grass-fed options: Not found.

Responded to Survey: Yes.

¹ Unless otherwise noted, information obtained from company survey responses.

Endnotes

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