

August 10, 2023

Dear John Zillmer,

Food Animal Concerns Trust (FACT) and the undersigned public health, advocacy, and medical organizations urge you to protect the health of your customers by prohibiting the use of the genotoxic and mutagenic veterinary feed additive carbadox in your pork supply. On April 12, 2016 the [Food and Drug Administration \(FDA\) initiated steps to ban the drug](#) because “New evidence regarding carcinogenic residues in edible tissues of swine treated with carbadox raises serious questions about the human food safety of the drug.” In July 2020, the [FDA proposed to revoke the current approved method](#) for detecting carcinogenic residues of carbadox in pork tissues because the existing method does not meet the agency’s requirements to assure that cancer causing drugs like carbadox are safe. In each case the FDA has indicated that it wants to prohibit the sale of the drug, but is restrained by legal and administrative hurdles that delay action. You are not bound by such hurdles and can act to immediately protect your customers. We request that you do this.

The use of carbadox creates an unacceptable and unnecessary cancer risk for pork consumers and simultaneously presents health risks to [food system workers](#) that handle the drug in feed facilities and on farms. Carbadox and several of its metabolites are known carcinogens and they have recently been found in [surface water](#). This presents an additional exposure for not only humans, but wildlife and the environment. Finally, [recent studies](#) indicate that use of carbadox increases the spread of resistance and virulence genes in foodborne pathogens.

The FDA may eventually ban the use of the drug, but it has been almost six years since the FDA indicated its intent to take it off the market and the drug maker continues to push back on FDA’s efforts. Meanwhile, millions of pigs are administered carbadox every day, assuring that consumers of pork will continue to be exposed to carcinogenic residues, workers will continue to experience toxic effects from handling the drug, and mutagenic carcinogens will continue to pollute our surface waters and soils. While we continue to demand that the FDA move forward with its proposed ban, we believe that your industry can use its significant buying power to protect public health by developing strong policies to eliminate the use of carbadox in your pork supply.

Leadership from the US food distribution industry is urgently needed. If you haven’t done so already, we urge you to proactively protect your customers by prohibiting the use of carbadox in your pork supply. The use of carbadox is already banned in Europe, Japan, China, the United Kingdom, Australia, Brazil, and Canada, and the international food safety standard setting body Codex Alimentarius recommends carbadox not be used in food producing animals.

Please respond to this letter letting us know about Aramark’s policy on the use of carbadox in its pig supply. We would like to discuss with you how we can support your efforts to protect your customers from the cancer risk caused by this drug. Please contact Steven Roach by

email at sroach@foodanimalconcerns.org to respond or if you have any questions. We would be happy to set up a call with you to discuss this further and would appreciate a reply by September 8.

Sincerely,

Alliance for Humane Biotechnology
American Grassfed Association
Antibiotic Resistance Action Center, the George Washington University
Center for Biological Diversity
Center for Food Safety
Consumer Federation of America
Consumer Reports
Earthjustice
Farm Forward
Food Animal Concerns Trust
Government Accountability Project Food Integrity Campaign
Illinois Food Justice Alliance
Oregon Physicians for Social Responsibility
Organic Consumers Association
Rachel Carson Council
San Francisco Bay Physicians for Social Responsibility
Socially Responsible Agriculture Project
Waterkeeper Alliance
World Animal Protection