

September 27, 2022

Dear CEOs of Pork Processing Companies,

The undersigned organizations, on behalf of millions of concerned supporters, urge you to prohibit the use of the genotoxic and mutagenic feed additive carbadox in your pork supply. The U.S. Food and Drug Administration and other international public health authorities have for years recognized the human risks associated with the administration of carbadox to swine.¹ Consuming pork products from pigs given carbadox subjects consumers to exposure to carcinogenic residues, elevating the risk of cancer. Farmworkers may experience allergen and genotoxic hazards upon inhalation or skin exposure when handling the drug.² And recently, carbadox has been found to contaminate streams and lakes, posing a threat to humans as well as aquatic fish and wildlife.³

Carbadox is not only dangerous for consumers, workers, and the environment, but unnecessary for maintaining animal health. Carbadox cannot legally be used to treat disease in animals but is instead used to control the spread of disease and speed up growth. Alternative drugs are available for the health conditions for which carbadox is used. Countries and regions that have long banned the drug, including the European Union, the United Kingdom, Canada, China, Brazil, Australia, Japan and Uruguay, still maintain successful swine industries without its use.

In 2016, the FDA initiated formal action to withdraw approval of carbadox due to safety concerns.⁴ This came two years after the international standard setting body Codex Alimentarius found that there is no safe level of residues of carbadox or its metabolites in food that represents an acceptable risk to consumers.⁵ 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.⁶ Without an approved method it is impossible to determine whether or not carcinogenic residues exist in food and it is impossible to ensure consumer safety.

¹ Federal Register. "Phibro Animal Health Corp.; Carbadox in Medicated Swine Feed; Opportunity for Hearing: A Notice by the Food and Drug Administration." Federal Register, April 12, 2016.

<https://www.federalregister.gov/documents/2016/04/12/2016-08327/phibro-animal-health-corp-carbadox-in-medicated-swine-feed-opportunity-for-hearing>.

² Baars, A.J. "Carbadox - An Evaluation" 97.17 (April 1997). <https://edepot.wur.nl/264615>.

³ Ferrey, Mark, Summer Streets, April Andrews, and Will Backe. "Pharmaceuticals and Chemicals of Concern in Minnesota Lakes." *Minnesota Pollution Control Agency*, January 2021.

⁴ U.S. Food & Drug Administration |Center for Veterinary Medicine. "FDA Takes Steps to Withdraw Approval of the Swine Drug Carbadox Due to Safety Concerns." FDA News Release. FDA, April 8, 2016.

<https://www.fda.gov/news-events/press-announcements/fda-takes-steps-withdraw-approval-swine-drug-carbadox-due-safety-concerns>.

⁵ Joint FAO/WHO Food Standards Programme CODEX Alimentarius Commission. "Report of the Twenty-First Session of the CODEX Committee on Residues of Veterinary Drugs in Foods" 37 (July 14, 2014).;

U.S. Food & Drug Administration |Center for Veterinary Medicine. FDA, April 8, 2016.

⁶ Regulations.gov. "Docket FDA-2016-N-0832 | Phibro Animal Health Corp.; Carbadox in Medicated Swine Feed; Revocation of Approved Method," July 19, 2020. <https://www.regulations.gov/document/FDA-2016-N-0832-0069>.

The FDA has indicated its intention to prohibit the sale of the drug, but is restrained by legal and administrative hurdles that delay action. However, you can act now. If you have not done so already, **we urge you to protect the health of your consumers and prohibit the use of this drug in your pork supply.**

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.

Signed,

Alliance for Humane Biotechnology
American Grassfed Association
American Medical Student Association
American Society for the Prevention of Cruelty to Animals (ASPCA)
Center for Biological Diversity
Center for Food Safety
Community Alliance for Global Justice
Consumer Federation of America
Environmental Working Group
Farm Forward
Farmworker Association of Florida
Food Animal Concerns Trust
Friends of the Earth
Humane Society Legislative Fund
Humane Society Veterinary Medical Association
Kewaunee CARES
Lymphoma Foundation of America
Maine Organic Farmers and Gardeners Association (MOFGA)
Mercy For Animals
Rachel Carson Council
Socially Responsible Agriculture Project
San Francisco Bay Physicians for Social Responsibility
The Alliance for Natural Health USA
The Humane Society of the United States
Union of Concerned Scientists
Waterkeeper Alliance