

Alliance for the Prudent Use of Antibiotics | Alliance to Save Our Antibiotics  
Antibiotic Resistance Action Center, George Washington University Milken Institute School of Public Health  
Arizona PIRG | CA League of Conservation Voters | California Public Health Association – North  
CalPIRG | Catholic Rural Life | Center for Food Safety | Center for Foodborne Illness Research & Prevention  
Center for Science in the Public Interest | Central Co-Op | Changing Markets | ConnPIRG  
Consumers International | Consumers Union | CoPIRG | Environmental Working Group | FamilyFarmed | Farm Forward  
Friends of the Earth | Food and Water Watch | Food Animals Concern Trust | Food Democracy Now! | Green America |  
Health Begins | Health Care Without Harm | Illinois PIRG | Institute for Agriculture and Trade Policy  
Johns Hopkins Center for a Livable Future | Keep Antibiotics Working | Maryland PIRG | MASSPIRG  
Natural Resources Defense Council | Northern California Public Health Association | Oregon Latino Health Coalition  
Oregon Physicians for Social Responsibility | Oregon Public Health Institute | Oregon State Senate  
Oregon State Public Interest Research Group | Organic Consumers Association | Physicians for Social Responsibility - SF Bay  
Public Health Institute | ReACTEurope | RealFood Challenge | Roots of Change | San Francisco BayKeeper | Slow Food California  
Slow Food USA | Socially Responsible Agriculture Project | Southern California Public Health Association | Stewart Farms, Inc  
STOP Foodborne Illness | Summer Tomato.com | The Deirdre Imus Environmental Health Center and the Hackensack University Medical  
Center | The Food Babe.com | WashPIRG | Waterkeeper Alliance | WisPIRG | U.S. PIRG

June 23, 2015

Frederick De Luca  
President and CEO  
Subway Franchise World Headquarters  
325 Bic Drive  
Milford, CT 06461-3059

Dear Mr. DeLuca,

We write you as a coalition representing millions of supporters to express our concern about the overuse of antibiotics in livestock production and to ask for your leadership to address this problem. According to the [Centers for Disease Control and Prevention](#), the rise of bacteria resistant to commonly relied-upon antibiotics is one of our most pressing public health threats. Each year in the US, two million people contract antibiotic-resistant infections and 23,000 die as a result. Due to worsening resistance, future organ transplants, cancer chemotherapy, dialysis, and other medical procedures that cannot be safely done without effective antibiotics are at risk. While overuse of antibiotics in human medicine is a major contributing factor, the nation's health experts agree that feeding low doses of antibiotics to animals that are not sick contributes to the rise of antibiotic-resistant bacteria.

***Our groups call on Subway to show leadership on antibiotic stewardship by:***

- 1** Defining a time-bound action plan to phase out the routine use of antibiotics (i.e., for growth promotion and disease prevention) across all Subway meat supply chains, including turkey, beef and pork;
- 2** Acting now to end the routine use of medically-important antibiotics in the production of chicken sold in your restaurants;
- 3** Adopting third-party auditing of your antibiotics use policy and benchmarking results showing progress in meeting the goals described above.

Antibiotics important for human medicine should only be used to treat sick animals and, on rare occasions, for non-routine disease control, but never for growth promotion, feed efficiency, or routine disease prevention. While we will continue to push FDA to adopt stronger policies on antibiotics use in animal agriculture, companies like Subway can make a vital contribution to stemming antibiotic resistance by disallowing routine antibiotics use among your suppliers. Subway can also play a role in encouraging better animal husbandry on farms. Reduced crowding, improved diets, more hygienic conditions and longer weaning periods, among other changes, can minimize the need for prophylactic drugs.

As one of the largest fast food restaurant chains in the world—and one that markets itself as serving healthy meals—Subway can join the ranks of McDonald's, Panera Bread, Chick-fil-A, and many others in the industry that have responded to growing consumer demand for meat raised without the routine use of antibiotics. **With 70% of medically-important antibiotics in the US sold for livestock use, we cannot fix the problem of antibiotic resistance unless the livestock sector and large meat buyers like Subway are part of the solution.** We appreciate your attention to our concerns and are aware that Subway is testing a new Chicken Caprese Sandwich in Southern California, described as produced with “no antibiotics ever.” In the coming months, we hope you will move quickly to serve only meat and poultry produced without routine antibiotics in all Subway restaurants, and help protect the effectiveness of these essential medicines.

Respectfully,

Jane Kramer, Director,  
**Alliance for the Prudent Use of Antibiotics**

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