

January 29, 2018

David Post
Director of Research
2017 Public Comment Period
Sustainability Accounting Standards Board
1045 Sansome St., Suite 450
San Francisco, CA 94111

Re: SASB Public Comment Period, Proposed Changes to Provisional Standards, Food & Beverage Sector

Dear Mr. Post,

The following comments are supported by investors and organizations representing over \$60 billion in assets under management and are in response to SASB's proposed changes to its Provisional Standards. All comments pertain to the Food & Beverage Sector. Please find a summary of our concerns by industry below, followed by in-depth commentary on the key changes of concern. We appreciate the opportunity to share our thoughts and encourage dialogue between this group and SASB about any of the topics covered.

Industry: Agricultural Products

- Disclosure Topic: Land Use & Ecological Impacts (Accounting Metric Codes: CN0101-08 through CN0101-12)
 - This topic was replaced with Environmental & Social Impacts of Ingredient Supply Chains, which replaces many quantitative metrics with discussion-based summaries. Investors require quantitative metrics to make sound risk assessments and comparisons between companies. We suggest that the quantitative metrics pertaining to wastewater, environmental regulations, fertilizer, and pesticide consumption remain in any changes made.
 - All mentions of agrochemicals, including fertilizer (CN0101-11) and pesticides (CN0101-12), were removed, despite increasing concern about the use of these chemicals and strengthening policies and reporting requirements put in place by brands and companies throughout the supply chain.
- Disclosure Topic: GMO Management (FB0101-16)
 - We are concerned that GMO management is considered an independent section rather than a metric within the Environmental & Social Impacts of Ingredient Supply Chains, taking priority over the metrics previously required under Land Use & Ecological Impacts. This is one aspect of agricultural sustainability, and this section includes only one metric.
- Disclosure Topic: Workforce Health & Safety (CN0101-19)
 - The description of efforts to reduce employee exposure to pesticides was removed, which concerns us given extensive evidence that regular and significant exposure to certain pesticides can lead to life-threatening diseases and disorders. We suggest this metric not be removed.
 - The description of Fair Labor Practices was removed and the metrics contained in the Environmental & Social Impacts of Ingredient Supply Chains section does not adequately cover the supply chain labor risks including child labor, forced labor, or ethical recruitment of migrant laborers.
- Disclosure Topic: Management of the Legal & Regulatory Environment (CN0101-26)
 - Reporting on lobbying was removed and not included in any other sector. Lobbying activities can cause material damage to a company in any sector, as we explain further below.

Industry: Meat, Poultry, & Dairy

- Disclosure Topic: Land Use & Ecological Impacts (CN0102-06 through .44)

- The accounting metrics that pertain to water have been removed from the section that speaks to directly to the source of the risks from CAFOs and animal-product processing facilities where large and concentrated amounts of waste and pollutants are spilled into the environment. While there is a section on Water Management, it appears to pertain specifically to the animal processing facilities/slaughter versus the field where feed crops are grown, or CAFOs where the animals are raised. The Water Management section could more holistically introduce the risks from field to processing which a water management plan would include. As is, the Land Use & Ecological Impacts section doesn't adequately cover wastewater management.
- Disclosure Topic: Antibiotic Use in Animal Production (FB0102-17)
 - Antibiotic use is not separated by animal protein type, which is necessary information for investors and other stakeholders to understand a company's antibiotic use policies and where they stand in relation to the regulatory environment, consumer demand, and competitive pressure. We suggest that this metric require the same information to be separated by animal protein type: e.g., chicken, pork, beef, turkey, fish.
 - Line of Disclosure: .72. "Medically important antibiotics" are defined by the U.S. Food and Drug Administration (FDA) list rather than the list provided by the World Health Organization (WHO). WHO's list is more extensive, stronger, and more recently updated; referred to by medical experts; and referred to by many companies that have set in place policies on medically important antibiotic use (see additional commentary below and Appendix B).
- Disclosure Topic: Environmental Risks in Animal Feed Supply Chains
 - There currently are no metrics around animal feed sustainability, including agrochemical use and fertilizer pollution that contributes to water quality impacts. These are key indicators in the sustainability of animal feed supply chains.
- Disclosure Topic: Workforce Health & Safety (FB0102-15)
 - Include metrics that cover management plans, policies, practices, performance, and improvement targets related to occupational health and safety and incidents of non-compliance with safety and labor laws, and how the company is managing workforce health and safety such as remedial actions taken and measures contributing to long-term mitigation and improvements. In addition, metrics should cover the presence of zoonotic pathogens in these workplaces. These metrics are key for this sector given the elevated rates of injury and illness.

Industry: Processed Foods

- Disclosure Topic: Environmental & Social Impacts of Ingredient Supply Chains (FB0103-20 through FB0103-22)
 - Reporting is notably high-level, relying on percentages, and governance and/or compliance-based, rather than quantitative reporting on meaningful supply chain practices and policies. Processed Foods companies should be held accountable for the practices in their supply chains that could have negative social and environmental, as well as financial, impacts. We suggest that metrics be added that require quantitative reporting on agrochemical, soil health management, deforestation risks and antibiotics in the ingredient supply chain.
- Disclosure Topic: Accounting Metrics (TA08-18-01.)
 - This section should be updated to reflect the specific use of social media and digital advertising to children. For example, to avoid the many loopholes with the industry defined CFBAI policies noted in this section, the metrics should include stronger nutritional standards for products marketed to children:
 - Standards on digital marketing campaigns that are designed and carried out in ways that give special consideration to children's and adolescents' nutritional and developmental vulnerabilities and needs.
 - Standards that protect youths' digital privacy and communicates its privacy policies clearly, to assure customers the company is not surreptitiously mining personal data.

- Standards that require that all foods marketed to children make a meaningful contribution to healthy diet by including whole grain, fruits, vegetables, low-fat dairy, fish, extra-lean meat or poultry, eggs, nuts and seeds, or beans – as do the Interagency Working Group’s guidelines and the USDA’s new regulations for competitive foods sold in schools.

Industry: Food Retailers & Distributors

- Disclosure Topic: Management of Environmental & Social Impacts of Ingredient Supply Chains (FB0401-20 through FB0401-23)
 - Reporting is notably high-level with metrics on environmental and social risks required only to be discussion-based rather than quantitative. Food Retailers and Distributors should be held accountable for the practices in their supply chains that could have negative social and environmental, as well as financial, impacts. We suggest that metrics be added that require quantitative reporting on agrochemical and antibiotic use in the ingredient supply chain, similarly to the metrics on cage-free eggs and gestation-crate-free pork.

Industry: Restaurants

- Disclosure Topic: Supply Chain Management & Food Sourcing (FB0501-15 through FB0501-17)
 - Reporting is notably high-level with metrics on environmental and social risks required only to be discussion-based rather than quantitative. Restaurants should be held accountable for the practices in their supply chains that could have negative social and environmental, as well as financial, impacts. We suggest that metrics be added that require quantitative reporting on agrochemical and antibiotic use in the ingredient supply chain, similarly to the metrics on cage-free eggs and gestation-crate-free pork.

Commentary

As investors and organizations that support increased corporate transparency and accountability as a necessary framework to mitigate financial risk and reduce negative environmental and social impacts within the agricultural supply chain, we are concerned about several of the high-level changes made in SASB’s Food & Beverage Sector Standards. Our comments focus on agrichemical use, antibiotic use, quantitative reporting on supply chain environmental and social risks across all food and beverage sectors, and political lobbying activities.

All sectors appear to be missing accounting metrics for agrochemical use. Brief questions about fertilizer and pesticide use, including worker exposure to pesticides, were deleted from the Agricultural Products sector. The Environmental and Social Impacts section of Agricultural Products recommends high level narrative about key issues, but does not require quantitative reporting. This is highly concerning given the demonstrated interest of investors, policymakers, and civil society in these issues. For example: United Nations officials report that pesticides have “catastrophic impacts on the environment, human health and society as a whole”¹; countless prominent researchers, policymakers, and NGOs have raised concern regarding inadequate agrochemical regulation²; shareholders filed at least five proposals with companies in 2017 primarily focusing on pesticide use³, one of which received more than 31% support⁴ while two others were withdrawn in agreements with companies; and most significantly, dozens of major food companies have made commitments to manage use of pesticides far

¹ <https://www.theguardian.com/environment/2017/mar/07/un-experts-denounce-myth-pesticides-are-necessary-to-feed-the-world>

² Article relating to global concerns about fertilizer use:

(a) <http://www.bbc.co.uk/news/science-environment-41945650>

Article relating to concerns regarding eutrophication caused by the meat industry:

(b) <https://www.ecowatch.com/tyson-foods-toxic-dead-zone-2504305201.html>

³ See: Proxy Previews 2017 p. 29, available at <http://www.proxypreview.org>. Note: this publication does not include a proposal filed later in 2017 with Hain Celestial by Green Century and As You Sow, available at <https://www.asyousow.org/wp-content/uploads/2017/10/Hain-Celestial-Sustainability-Resolution-2018.pdf>. Withdrawal agreement available at <https://www.asyousow.org/wp-content/uploads/2017/10/Hain-Withdrawal-20171016.pdf>

⁴ <https://greencentury.com/nearly-one-third-of-dr-pepper-snapples-shareholders-support-proposal-to-reduce-pesticide-use-and-increase-transparency/>

beyond regulatory compliance, which is well-understood to be insufficient to protect public health.⁵ A particularly effective policy is employed by Unilever in regards to its tea sourcing: the company aligns its supplier standards with the recommendations of international authorities, such as the WHO, focusing its efforts on eliminating and reducing pesticide classes defined by WHO, and setting timelines and milestones to measure its efforts.

Antibiotic use is only mentioned in the Meat, Poultry & Dairy sector, even though many companies further down the supply chain have implemented significant policies regarding these practices that are far beyond regulatory compliance. Given the increasingly imminent threat of antibiotic resistance and its clear link to the misuse and overuse of antibiotics in the meat production industry, there is strong evidence that antibiotic use is a material risk to companies in all food and beverage sectors. These include companies in the Processed Foods, Food Retailers & Distributors, and Restaurants sectors (see Appendix B).

We also note that investors have overwhelmingly voted in favor of shareholder proposals relating to antibiotics. In May 2017, more than 31% of McDonald's shareholders supported a proposal that called on the company to phase out the non-therapeutic use of medically important antibiotics in beef and pork. Notably, this proposal did not simply request greater transparency, but dictated a particular course of action, and still received significant shareholder support.⁶ Farm Animal Investment Risk and Return (FAIRR) has organized an investor network representing over \$3 trillion in assets under management who have endorsed responsible antibiotic use policies far beyond regulatory compliance, recognizing the material risk of inaction on this issue. The investor coalition has called on laggard companies in the restaurant sector to minimize the use of medically important antibiotics in global livestock supply chains.⁷

In SASB's draft standards, requested metrics on antibiotic use do not require the separation of antibiotic use by animal protein, a differentiation that investors and stakeholders find necessary to properly understand a company's antibiotic use practices, the impacts of these practices, and how these practices compare with those of the company's peers. Further, "medically important antibiotics" are defined according to the FDA's categorization rather than the stricter WHO [guidelines](#), updated in 2017, which many companies adhere to.⁸ We applaud SASB's accurate definition of non-therapeutic use, which includes all routine purposes including growth promotion and disease prevention.

We are also concerned that after revisions, reporting on environmental and social supply chain impacts are notably less quantitative, focused mainly on discussions about high-level strategies, governance, and compliance, especially for sectors down the supply chain. Understanding how a company is addressing and mitigating the risks in its supply chain is important to investors regardless of the company's sector. It is difficult for investors to make sound risk assessments when they are only provided with high-level discussions about policies and practices rather than quantitative metrics.

The removal of reporting on political lobbying in the Agricultural Products sector, and the absence of lobbying in all other sectors, is of concern as well. Lobbying disclosure remains one of the most popular topics in shareholder proposals, numbering over 90 proposals filed in 2016, with average support of 26% of shares.⁹ Lobbying activities can cause material damage to a company in any sector, as seen in the controversy surrounding ALEC.¹⁰ Disclosure of policies and activities relevant to lobbying can ensure that a company's lobbying serves shareholders' long-term interest rather than management's personal politics.

⁵ see Appendix A

⁶ <https://medium.com/u-s-pirg/antibiotic-use-a-big-concern-for-mcdonalds-shareholders-791ec4318f3a>

⁷ <http://www.fairr.org/investor-engagements/>

⁸ For example, see McDonald's Statement on Antibiotic Use: <http://news.mcdonalds.com/us/media-statements/response-to-antibiotics-in-chicken>

⁹ <https://www.afscme.org/news/press-room/press-releases/2016/institutional-investors-continue-to-press-companies-for-disclosure-of-lobbying-in-2016>

¹⁰ For example: https://www.huffingtonpost.com/2014/09/22/google-alec-funding_n_5863416.html

We believe that companies may enjoy competitive advantages and avoid risk by attending to the environmental and social impacts of their supply chains. We appreciate the influence SASB has had in progressing mainstream sustainability reporting and educating key stakeholders on the materiality of environmental and social issues. Our comments are meant to highlight the areas where we believe SASB Standards could be even stronger. They reflect the areas in which we identify business risk and where investors, policymakers, civil society, and companies have demonstrated concern and action.

The contacts listed below would welcome further discussion on the points made, and hope these comments help inform the updated Standards. Thank you.

Sincerely,

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Appendix A: Food Company Policies Related to Minimizing Pesticide Use and Impacts

AGRICULTURAL PRODUCTS

n/a

MEAT, POULTRY, & DAIRY

n/a

PROCESSED FOODS

- **Unilever**

- **General:** Discloses amounts of pesticides avoided by farmers using Integrated Pest Management (IPM) practices¹¹:
 - *Our findings to date are positive. For farmers who have been part of our programme over 2012-2015, performance against most of our sustainability measures has improved. Farms that implemented an IPM plan, for example, report that they are using around 1kg less pesticide per tonne of crop than farms not following an IPM Plan, with no loss of crop yield.*
- **Tea:** Unilever¹² also discloses global guidelines on use of pesticides in its tea supply chain including time-bound goals for use reduction and phase out of specific classes of pesticides.
 - Phased out by 2014: WHO Class 1a or Class 1b pesticides by 2014, Pesticides listed as Persistent Organic Pollutants (POP) in the Annexes to the Stockholm Convention; and 2 Pesticides subject to the Rotterdam Convention on Prior Informed Consent (PIC) procedure for certain hazardous chemicals in international trade, as listed in Annex III to the Convention.
 - Our ambition is the elimination of WHO Class II pesticides from tea production for Unilever by 2020.
 - In addition, we will work with our suppliers and national governments or regulatory agencies to eliminate or actively reduce as far as reasonably practicable the use of WHO Class III pesticides. Growers and suppliers must have a plan in place for reducing or eliminating where possible the use of WHO Class III pesticides.

- **Ben and Jerry's** (owned by Unilever)

- **Glyphosate:** Banned the pre-harvest use of glyphosate in its supply chain by 2020.¹³

- **General Mills**

- **Neonics:** Addressed the use of neonics in its Global Responsibility 2015 and 2017¹⁴ reports, and in its most recent report stated:
 - *We collaborate with leading researchers and conservationists to improve the health and quantity of pollinators. We fund research to better understand the decline of honeybees, invest to conserve and expand bee habitats and work with our suppliers to improve the health and effectiveness of bees as pollinators."*
 - Invested \$4 million in pollinator habitat.¹⁵

¹¹unilever.com/sustainable-living/the-sustainable-living-plan/reducing-environmental-impact/sustainable-sourcing/our-approach-to-sustainable-sourcing/our-sustainable-agriculture-programme.html

¹²unilever.com/Images/unilever_guidelines_on_use_of_pesticides_in_sustainable_tea_sourcing_2014_tcm244-424148_en.pdf

¹³ <http://www.benjerry.com/about-us/media-center/sustainable-agriculture-vision>

¹⁴ <https://globalresponsibility.generalmills.com/HTML1/tiles.htm>

¹⁵ <https://www.generalmills.com/en/News/NewsReleases/Library/2016/November/pollinator-habitat>

- General Mills also says that through its partnership with the Xerces Society it is providing guidance¹⁶ to growers of key crops, such as corn and soy, on how to minimize the impact of neonics and other pesticides on pollinators.
- **ConAgra Foods**
 - **General:** As part of its 2020 sustainability vision to assure long-term access to necessary ingredients, works closely with its potato suppliers to encourage implementation of IPM programs, and collects qualitative and quantitative measures to benchmark performance between growers.
 - **Neonic:** ConAgra’s participation in the Potato Sustainability Initiative includes specific criteria to protect bee habitat and reduce pollinators’ exposure to harmful pesticides.
- **J.M. Smucker**
 - **General/Neonic:** made a multi-year commitment to the Pollinator Partnership; stated that the company “along with all food companies, need to understand the implications pollinator health risk has to our supply chain and business.”¹⁷ Smucker’s 2018 CSR report will include disclosures of its pesticide use management and reduction efforts.
- **Pop Weaver¹⁸, Pop Secret¹⁹ and Preferred Popcorn²⁰** announced phase-outs of neonicotinoids on corn seed

FOOD RETAILERS AND DISTRIBUTORS

- **Whole Foods Market**
 - **Neonics:** Responsibly Grown pesticide policy²¹, which went into effect January 1, 2017, prohibits and restricts pesticides “which pose the greatest risks to consumers [and] pollinators” for use in its produce and flowers. The policy prohibits the use of four of the most common neonics in living garden and floral plants for outdoor use as well as for all other “best” rated products.
- **Sysco**
 - **General/Neonics:** CEO stated in the company’s CSR report published in September 2015 that in its “efforts to increase the positive impact of our industry leading *Integrated Pest Management (IPM) Program*, our program standards now include enhancements to protect bee populations.”²² The company’s IPM program requires participating suppliers to track pesticide use with the goal of reducing quantity or toxicity, and has specific standards that encourage protection and creation of pollinator habitats. In the 2015 growing season, Sysco suppliers reported avoiding 4.9 million pounds of pesticides by implementing IPM practices and principles, including 113,000 pounds of pesticides that affect beneficial organisms.²³
- **Aldi**
 - **Neonic:** In 2016, the German supermarket chain asked its German and Dutch fruit and vegetable suppliers to stop using eight pesticides hazardous to bees²⁴

RESTAURANTS

- **Cheesecake Factory:** established pesticide use commitments with which their suppliers must comply by 2025.
 - Achieving a 15% reduction in the amount of water, synthetic pesticides, and synthetic fertilizers our suppliers use to grow our produce.

¹⁶ http://iowaipm.xerces.org/wp-content/uploads/2017/05/Neonicotinoid-Seed-Treatment-Use-in-Iowa_web.pdf

¹⁷ <http://corporateresponsibility.jmsmucker.com/responsible-sourcing/sustainable-agriculture.html>

¹⁸ <http://www.popweaver.com/news/2015-10-21Neonics%20Statement.pdf#zoom=66.7>

¹⁹ http://www.centerforfoodsafety.org/files/diamondstatement_popsecretemail_65258.pdf

²⁰ http://www.centerforfoodsafety.org/files/preferred-commitment-on-seeds1_87415.pdf

²¹ <https://assets.wholefoodsmarket.com/www/missions-values/Responsibly-Grown/20161112-WFM-Responsibly-Grown-Prohibited-and-Restricted-Pesticides-for-Fresh-Produce-and-Flowers.pdf>

²² <http://sustainability.sysco.com/2014/sustainability-at-sysco/letter-from-ceo.php>

²³ <http://sustainability.sysco.com/supplying-food-responsibly/sourcing-food-responsibly/sustainable-agriculture.php>

²⁴ <http://www.internationalsupermarketnews.com/news/22414>

- Eliminating pesticides classified as type 1a or 1b by the World Health Organization or pesticides that are banned according to national, regional, or local laws.
- Ensuring suppliers are submitting and implementing annual integrated pest management plans for produce ingredients.
- Working to reduce pesticides classified as Type II and III by the World Health Organization for the ingredients we purchase.
- Creating biodiversity action plans which detail suppliers planned efforts to conserve natural habitat, protect wildlife, and promote biodiversity adjacent to production areas.
- Creating and implementing a pollinator and beneficial insect conservation plan as a part of the larger biodiversity action plan.²⁵

NON-FOOD POLICIES

- 110 garden retailers, including **Lowe's**, **Home Depot**, **Wal-Mart**, **Costco**, and **Whole Foods** have agreed to implement time-bound phase outs of neonicotinoid pesticides in bee-attractive garden plants and off-the-shelf products.
- **Home Depot**
 - **Neonics**: In December 2015²⁶ announced a time-bound commitment stating that it is working with its suppliers to phase out neonics on live goods by 2018 and ensuring that 80 percent of its flowering plants are not treated with neonics.
- **Lowe's**
 - **Neonic**: agreed to phase out neonicotinoids in plants and products, redouble pesticide management efforts and implement an application reduction plan with plant suppliers. This includes the collection and sharing of growers' best practices around use of biological controls, integrated pest management practices and research into best alternatives. Nurseries are now required to disclose to Lowe's the amount of pesticides.²⁷
- **BJ's Wholesale Clubs**
 - **Neonics**: stated in 2014²⁸ that it was asking all its suppliers to provide plants free of neonics or to label such products as requiring "caution around pollinators" like bees.
- **Ortho** (part of the Miracle-Gro family)
 - **Neonic**: said it would discontinue use of neonics from all its products by 2021.²⁹

²⁵ <https://www.thecheesecakefactory.com/corporate-social-responsibility/sustainable-sourcing/>

²⁶ <http://ecooptions.homedepot.com/healthy-home/organic-gardening/>

²⁷ <http://domini.com/responsible-investing/making-difference/lowes-commits-decisive-action-protect-bees-and-other>

²⁸ <http://www.reuters.com/article/us-usa-agriculture-bees-idUSKBN0F02M120140625>

²⁹ npr.org/sections/thesalt/2016/04/12/473953151/home-and-garden-giant-ditches-class-of-pesticides-that-may-harm-bees

Appendix B: Food Company Policies Related to Reducing Antibiotic Use in the Meat Supply Chain

In November 2017, WHO released new guidelines³⁰ on the use of medically important antibiotics in animals, “strongly recommend[ing] an overall reduction in the use of all classes of medically important antibiotics in food-producing animals, including complete restriction of these antibiotics for growth promotion and disease prevention without diagnosis.”

According to the 2017 *Chain Reaction* report³¹, 14 out of the top 25 U.S. restaurant chains, which account for two-thirds of industry revenue, have implemented policies to reduce or eliminate the use of antibiotics in the meat supply chain. Companies outside the Restaurants sector have also implemented policies to do the same.

AGRICULTURAL PRODUCTS

n/a

MEAT, POULTRY, & DAIRY

- Perdue Farms³² and Tyson Foods³³, the second largest poultry company in the world, have committed to produce and serve only chicken raised without antibiotics. Perdue completed this transition in 2016, using antibiotics only to treat illness, or about five percent of the time, and Tyson in June 2017.
- The Canadian chicken industry³⁴ has successfully eliminated the preventative use of Category I antibiotics. Category II will be eliminated by the end of 2018 and Category III by the end of 2020.
- The Global Animal Partnership's standard³⁵, which prohibits the use of antibiotics, has been implemented by major companies, representing over 2,800 certified farms.

PROCESSED FOODS

n/a

FOOD RETAILERS & DISTRIBUTORS

- Compass Group³⁶, the world's largest contract foodservice company, prohibits the routine use of antibiotics in its chicken and turkey products, allowing only use for disease treatment. Compass is the parent company to Bon Appetit Management Company³⁷, which committed to chicken raised without the routine use of antibiotics in 2003. This commitment was extended to turkey in 2010. Beginning in 2007, the company's beef supply became antibiotic-free, and in 2016, their contracted pork became antibiotic-free as well.

RESTAURANTS

- Panera Bread³⁸, Chipotle Mexican Grill³⁹, and Cheesecake Factory⁴⁰ prohibit antibiotic use in all livestock supply chains.
- Subway⁴¹ and Chick-fil-A⁴² have committed to produce and serve only chicken raised without antibiotics.

³⁰ <http://who.int/mediacentre/news/releases/2017/antibiotics-animals-effectiveness/en/>

³¹ <https://foe.org/projects/food-and-technology/good-food-healthy-planet/chain-reaction/>

³² <https://www.perdue.com/perdue-way/no-antibiotics/>

³³ <https://qz.com/915746/tyson-foods-pledges-to-go-antibiotic-free-for-its-chicken-business-by-summer-2017/>

³⁴ <http://www.thepoultrysite.com/poultrynews/38930/canadian-chicken-industry-further-reducing-antimicrobial-use/>

³⁵ <https://globalanimalpartnership.org/take-action/>

³⁶ <http://www.compass-usa.com/wp-content/uploads/2016/01/CompassGroupUSAFarmAnimalWelfareFinal7.302.pdf>

³⁷ <http://www.bamco.com/timeline/fighting-antibiotics-abuse/>

³⁸ <https://www.panerabread.com/content/dam/panerabread/documents/nutrition/panera-bread-food-policy.pdf>

³⁹ <https://www.chipotle.com/food-with-integrity>

⁴⁰ <https://www.thecheesecakefactory.com/corporate-social-responsibility/sustainable-sourcing>

⁴¹ <http://money.cnn.com/2015/10/20/news/companies/subway-antibiotic-free-meat/index.html?iid=EL>

⁴² <https://www.chick-fil-a.com/About/Great-Food/No-Antibiotics-Ever>

- McDonald's⁴³ completed its phase out of all uses of medically important antibiotics in its U.S. chicken supply chain in 2016, months ahead of schedule. In 2017, the company expanded its policy to cover its global supply chain.
- Yum! Brands (owns KFC, Pizza Hut and Taco Bell)⁴⁴, Restaurant Brands International (parent to Burger King)⁴⁵, Wendy's⁴⁶, Starbucks⁴⁷, and Jack in the Box⁴⁸ have committed to phase out either all uses of medically important antibiotics or at least the routine uses of medically important antibiotics in chicken.

⁴³ <http://news.mcdonalds.com/us/media-statements/response-to-antibiotics-in-chicken>

⁴⁴ <http://www.yumcsr.com/about/antibiotic-policy.asp>

⁴⁵ <https://consumerist.com/2016/12/29/burger-king-tim-hortons-to-use-fewer-antibiotics-in-chicken/>

⁴⁶ <https://www.wendys.com/en-us/about-wendys/antibiotic-use-policy-and-guidelines>

⁴⁷ <https://globalassets.starbucks.com/assets/3ba66a085e7345e3bb8718844f574230.pdf>

⁴⁸ <http://www.jackintheboxinc.com/assets/AW-033017-b.pdf>