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

Emma Rose, Campaign/Lobbying/Communications Coordinator,  
Alliance to Save our Antibiotics

Laura Rogers, Deputy Director,  
Antibiotic Resistance Action Center,  
George Washington University  
Milken Institute School of Public Health

Diane Brown, Executive Director,  
Arizona PIRG

Jena Price, Legislative Director,  
California League of Conservation Voters

Adele Amodeo, Executive Director,  
California Public Health Association – North

Emily Rusch, Executive Director,  
CalPIRG

Robert Gronski, Policy Coordinator,  
Catholic Rural Life

Rebecca Spector, West Coast Director,  
Center for Food Safety

Patricia Buck, Founder and Executive Director,  
Center for Foodborne Illness Research & Prevention

David Plunkett, Senior Staff Attorney, Food Safety,  
Center for Science in the Public Interest

Webster Walker, Community Outreach Administrator,  
Central Co-op

Joakim Bergman, CEO,  
Changing Markets

Evan Preston, Director,  
ConnPIRG

Amanda Long, Director General,  
Consumers International

Jean Halloran, Director of Food Policy Initiatives,  
Consumers Union

Danny Katz, Director,  
CoPIRG

Scott Faber, Vice President of Government Affairs,  
Environmental Working Group

Jim Slama, President,  
FamilyFarmed

Aaron Gross, Founder and CEO,  
Farm Forward

Patty Lovera, Assistant Director,  
Food and Water Watch
Steve Roach, Food Safety Program Director, Food Animals Concern Trust

Dave Murphy, Founder/Executive Director, Food Democracy Now!

Kari Hamerschlag, Senior Program Manager, Food and Technology Program, Friends of the Earth

Nicole McCann, Director, Food Programs, Green America

Rishi Manchanda, MD, Founder, Health Begins

Emma Sirois, National Coordinator, Healthy Food in Health Care Program, Health Care Without Harm

Abe Scarr, Director, Illinois PIRG

Shefali Sharma, Director, Agricultural Commodities and Globalization, Institute for Agriculture and Trade Policy

Bob Martin, Director of Food System Policy, Johns Hopkins Center for a Livable Future

Richard Wood, Chair, Keep Antibiotics Working Steering Committee

Emily Scarr, Director, Maryland PIRG

Janet Domenitz, Executive Director, MASSPIRG

Lena Brook, Food Policy Advocate, Natural Resources Defense Council

Alberto Moreno, Executive Director, Oregon Latino Health Coalition

Kelly Campbell, Executive Director, Oregon Physicians for Social Responsibility

Liz Baxter, MPH, Executive Director, Oregon Public Health Institute

Senator Elizabeth Steiner Hayward, MD, Oregon State Senate

Ronnie Cummins, National Director, Organic Consumers Association

David Rosenfeld, Director, OSPIRG

Robert Gould, MD, President, San Francisco Bay Area Chapter, Physicians for Social Responsibility

Matthew Marsom, VP for Public Policy & Programs, Public Health Institute

Anna Zorzet, Coordinator, ReAct Europe

Anim Steel, Founder, Real Food Challenge

Michael Dimock, President, Roots of Change

Sejal Choksi-Chugh, Executive Director & BayKeeper, San Francisco BayKeeper

Brenda Ruiz, Policy Committee Chair, Slow Food California

Richard McCarthy, Executive Director, Slow Food USA

Kendra Kimbirauskas, CEO, Socially Responsible Agricultural Project

Cherise Chartwell, MPH, President, Southern California Public Health Association

Cheryl A. Stewart, Stewart Farms, Inc.

Deirdre Schlunegger, CEO, STOP Foodborne Illness

Darya Rose, PhD, Founder, SummerTomato.com

Kyle Tafuri, Sustainability Advisor, The Deirdre Imus Environmental Health Center & Hackensack University Medical Center

Vani Hari, Founder, TheFoodBabe.com

Steve Blackledge, Public Health Program Director, U.S. PIRG

Bruce Speight, Director, WashPIRG

Kelly Foster, Senior Attorney, Waterkeeper Alliance

Peter Skopec, Director, WisPIRG