



April 8, 2022

Paul Kiecker
Office of the Administrator
U.S. Department of Agriculture's Food Safety and Inspection Service
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Re: False labeling claims in Whole Foods' "raised without antibiotics" beef

Dear Administrator Kiecker,

We are deeply concerned about the false labeling claims recently evidenced in the "raised without antibiotic" beef cattle market. Yesterday, Science magazine published a [study](#) in which they presented concerning empirical evidence that significant portions of beef cattle, labeled under various USDA-approved labels as "raised without antibiotics," have been administered antibiotics. The study reported that 26% of cattle to be labeled in the "Global Animal Partnership" program, a certifying program created and widely used by Whole Foods, came from feedlots with at least one positive test for antibiotics. One of its certifying criteria is that animals are raised without antibiotics. This is not the first, but the second set of evidence presented this week of false labeling claims found within Whole Foods' antibiotic-free cattle market: On April 5th, Farm Forward [announced](#) that they had found antibiotic residue in meat purchased from Whole Foods stores.

Based on this evidence of false labeling claims, we are writing to ask FSIS to take action by requesting Whole Foods initiate an immediate recall. As the owner of the label, according to FSIS [protocol](#), Whole Foods is responsible for initiating the recall. If Whole Foods refuses to recall their falsely labeled beef products, then FSIS has the "legal authority to detain and seize those products in commerce" and should do so. Following said recall, we are requesting that FSIS investigate the entire Whole Foods supply chain — from the retail stores, to the processing facilities, to the producers — to ensure all label claims are substantiated.

Only a recall, thorough investigation, and appropriate penalties will protect consumers and those farmers who do comply with the antibiotic-free claims. Failure to take these steps perpetuates a system that rewards deceit and endangers consumers.

Sincerely,

A handwritten signature in black ink that reads "Joe Maxwell".

Joe Maxwell
President, Farm Action

A handwritten signature in black ink that reads "Carrie Balkcom".

Carrie Balkcom
Executive Director, American Grassfed Association

cc: Secretary Vilsack