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Mr. Cameron Bruett, JBS USA  
Head, Corporate Communications at JBS USA; Chief Sustainability Officer  
President, GRSB Executive Committee  
Cameron.bruett@grsbeef.org

Mr. Roger Cady,  
Senior Technical Consultant - Global Sustainability Lead, Elanco  
Vice President/Treasurer, GRSB Executive Committee  
Roger.cady@grsbeef.org

Mr. John Carter,  
Aliança da Terra  
Secretary, GRSB Executive Committee  
John.carter@grsbeef.org

Mr. Gary Johnson,  
Senior Director of Worldwide Supply Chain, McDonald's Corporation  
Vice President, GRSB Executive Committee  
Gary.johnson@grsbeef.org

Mr. Forrest Roberts,  
Chief Executive Officer, National Cattlemen's Beef Association  
Vice President, GRSB Executive Committee  
Forrest.roberts@grsbeef.org

**Re: Response to the Global Roundtable on Sustainable Beef *Principles, and Criteria for "Sustainable Beef"***

Dear Sirs,

We, the following organizations representing millions of our members and online activists, applaud the Global Roundtable on Sustainable Beef (GRSB) for acknowledging the importance of ensuring that future global production and sourcing of beef is truly sustainable. Certainly, the creation of principles and criteria that address the social and environmental problems associated with conventional beef production is vital. We also applaud the GRSB's recognition that the three different aspects of sustainability—social responsibility, environmental sustainability and economic viability—must be in balance.

However, we believe the GRSB's *Principles and Criteria for Global Sustainable Beef* are fundamentally flawed. At best, the report represents little more than a collection of worthy aspirations that are already widely accepted. At worst, by failing to address many of the fundamental problems of intensive beef production as practiced today, the GRSB's *Principles and Criteria* report could be regarded as nothing more than an attempt to pass off "business as usual" farming as

“sustainable.” We are deeply disappointed by the lack of leadership demonstrated by this process, particularly given the urgent need to achieve real, measurable, and verifiable change in conventional beef production.

The approval of these principles and criteria is a lost opportunity. Rather than asking its members to take a long, hard look in the mirror, it appears as if the GRSB’s chief concern is to protect the vested interests of those stakeholders who profit most from the existing intensive and unsustainable production model—and who stand to lose the most from change.

While the GRSB states that it has deliberately avoided outlining indicators, metrics or practices on the basis they are “only applicable in a narrow range of environments and systems and therefore need to be developed at the local level,” we believe that in order to be credible, any further local and international work in this area must properly tackle the following fundamental limitations of the GRSB’s *Principles and Criteria* report—and the industrial beef production model itself:

### **1. Failure to Address Misuse of Antibiotics**

Our collective misuse of antibiotics has created the possibility of a medical future where we can no longer rely on antibiotics to treat sick humans or sick animals. Experts from the World Health Organization, the U.S. Centers for Disease Control and Prevention, and the chief science advisors to the White House agree that the loss of antibiotics represents one of the greatest threats to mankind. The same scientific consensus also suggests the routine misuse of antibiotics in food animal production is a significant factor in the development of potentially life-threatening antibiotic-resistant bacteria, often termed “superbugs”

On this basis, a beef production system reliant on the routine use of medically important antibiotics to mask poor animal husbandry is, by any definition, not sustainable. Yet the GRSB’s *Principles and Criteria* do not address routine antibiotic use in industrial beef production. The document simply states, “All veterinary pharmaceuticals and vaccines are used responsibly and in accordance with labeling.”

There are also fundamental contradictions in the GRSB’s principles on this issue. One of the criteria for animal health and welfare states “Cattle are kept in an environment (including stocking density, air quality and surfaces), which is conducive to good health and normal behavior and minimizes physical discomfort.” In other words, if animals are managed properly they will stay healthy. Yet this conveniently ignores the major disease challenges created by the industrial production systems themselves—that is, the infections and other health problems caused or exacerbated by stress, overstocking, insanitary conditions and inappropriate diet. These predictable—and wholly avoidable—health risks are those that lead to claims that routine antibiotic use is necessary for the health of the animals. Setting principles and criteria around sustainability is meaningless unless they address and specify the fundamental changes to management required to *avoid* routine

antibiotic use in the first place. Months ago, several of our organizations communicated these concerns to the GRSB.

Furthermore, in its supporting *Responses to Comments* document, the GRSB clearly condones the continued use of “antibiotics that are critically important to human health... for disease prevention, treatment, and control.” We cannot commend the GRSB members—nor should they commend themselves—for arriving at a common definition for sustainable beef that ignores scientific consensus on this matter, and continues to allow the routine use of vast quantities of antibiotics that are important to human health—especially for animals that are not clinically diagnosed as being sick. Healthy animals do not need antibiotics, and our first priority *must* be to do all we can to preserve those antibiotics that we still have.

## **2. Failure to Ensure Animal Health and Welfare**

While the GRSB lists animal health and wellbeing as one of its core principles there is little in the criteria to deliver this. As noted above, the GRSB appears to have no intention of changing the status quo and the industrial confinement beef production model can still be defined as “sustainable” under its criteria. The GRSB sees no contradiction in stating that cattle should be kept in an environment “which is conducive to good health and normal behaviour and minimizes physical discomfort,” and then defining systems that confine grazing and roaming ruminants to bare dirt lots as acceptable for delivering animal wellbeing.

Animal health and wellbeing can never be delivered when cattle are kept in high densities in dirt lots and fed high-grain diets. Cattle kept in these conditions inevitably require antibiotics (see above) to resolve respiratory problems and liver abscesses, and routinely suffer from other conditions such as bloat and acidosis. Furthermore, the GRSB has failed to require changes to other common management practices that are known to cause pain and distress, such as castration and dehorning.

Aside from the issue of antibiotics, other pharmaceuticals commonly given to beef cattle include hormones and beta agonists, used to maximize growth. The GRSB says that growth promoter and feed efficiency enhancers are “beyond the scope” of their principles and criteria, yet it is now widely accepted that these inputs can harm cattle health. In fact, some of the largest meat packers in the U.S.—including GRSB members Cargill and JBS, and another non-GRSB member, National Beef Packing—stopped using one particular beta agonist (zilpaterol, aka *Zilmax*) last year due to concerns about animal welfare and the difficulty treated animals had in walking. Earlier this year, a study involving hundreds of thousands of cattle found that the use of beta agonists (ractopamine or zilpaterol) increased the cumulative risk and incidence rate of death by between 75–90%. Yet despite this clear scientific evidence, and the actions of some of the largest beef companies, the GRSB does not think it worthy of consideration.

### 3. Major Omissions and Lack of Clearly Defined Strategies for Reducing Environmental Harm

The GRSB's principle is that the global beef value chain manages natural resources responsibly and enhances ecosystem health. But while some criteria in this section have been improved from the original draft document, their vagueness—coupled with the lack of meaningful performance measures—raise major doubts as to whether these criteria will result in significant and necessary changes in feed production and livestock management. The GRSB also fails to confront key, inherent environmental problems associated with confinement beef production.

The criteria fail to address one of the most unsustainable aspects of large-scale confinement operations, namely the collection of vast quantities of manure that comes from raising too many animals in one geographic location. Poorly constructed and managed manure storage facilities, including lagoons, rainfall catchment basins, and heaps are a major source of land, air, water pollution, and greenhouse gas emissions—and yet the GRSB fails to set any criteria for responsible manure management or reduced stocking densities that would reduce and limit the overall quantity of manure being produced and improperly disposed of.

The GRSB's criteria relating to the sourcing of sustainably produced feed also represent a huge loophole for beef producers. First, there is no definition of what “sustainably-produced” feed actually means. Second, the use of sustainable feed is only suggested where it is available. This means beef producers can carry on sourcing whatever feed they like while meeting GRSB criteria simply by claiming that sustainable feeds are not available.

Feed production for beef in many areas of the world is responsible for rapid depletion of groundwater supplies, major nutrient and pesticide pollution, rapid deforestation and land conversion, among other things. Yet these aspirational principles simply say that there should be a continual process of improvement. Continual improvement, with no clear performance standards or specific goals, cannot be presented as a “sustainable” approach to feed production.

Finally, most corn and soy used for livestock feed in the U.S., Argentina and Brazil are genetically modified (GM) to tolerate large doses of herbicides. This has led to a dramatic increase in the use of glyphosate herbicides and the subsequent development of herbicide-resistant “super weeds” that in some cases have resulted in lower yields than non-GM alternatives. In response, the next generation of GM crops are designed to tolerate more toxic herbicides, such as 2,4-D and dicamba, which will lead to ever-increasing use of these more harmful herbicides that destroy healthy soil, biodiversity, and water resources, thus undermining the very intent of the natural resource principle—enhancement of ecological health. Following the increased use of herbicides from GM crops and the likely increase in the use of even more toxic herbicides on newly adopted GM crops, the use of GM crops in animal feed cannot be called sustainable. Yet the GRSB's *Principles and Criteria* conveniently ignore these concerns.

Given industrial beef production's major contribution to global greenhouse gas emissions, much more attention is needed on reducing emissions from intensive beef production systems, including feed production. Although one of the GRSB's criteria states that "Net greenhouse gas emissions from the beef value chain are minimized on a per unit of product basis," there are no criteria focusing on the reduction of the key greenhouse gases of carbon dioxide, methane, and nitrous oxide. Feedlot cattle require corn, soy and grain—and lots of it. The production of these crops utilizes massive amounts of synthetic nitrogen. The U.S. Environmental Protection Agency states that more than sixty per cent of farming's nitrous oxide emissions come from the production and use of chemical fertilizer used to grow crops like corn and soy, yet the GRSB's *Principles and Criteria* do not acknowledge this fundamental issue.

#### **4. Failure to Address Fundamental Beef Industry Workers' Issues**

Workers are indispensable to beef production. If sustainability criteria do not address adverse worker conditions then they fail to truly define sustainability. The GRSB includes social responsibility as part of their definition of sustainable beef, and includes people and the community as one of their core principles, yet their criteria barely mention workers. Health, safety, freedom of association, and livable wages continue to top the list of major issues beef workers contend with on a daily basis. Aside from a reference to a legal minimum wage in countries where this is defined, the GRSB ignore all of the above. In order to address these issues, the *Principles and Criteria* must include clear language that conveys the need for:

- Fair compensation and a voice at work for all food chain workers and producers—from production to consumption. More details are also needed on ensuring safe and healthy working conditions
- A fair deal for producers and workers in developing nations and economies
- Respect for the freedom of association of workers, farmers, and ranchers by all supply chain players; and
- A specific requirement that all vendors and suppliers sign in writing that they comply with domestic labor law (including state and local) in countries where they grow and process beef, as well as the core standards of the International Labour Organization (ILO):
  1. Freedom of association and the right to collective bargaining
  2. Elimination of all forms of forced or compulsory labor
  3. Abolition of child labor
  4. Elimination of discrimination with respect to employment or occupation.

#### **5. Failure to Address Key Ranchers' Issues and Promote Sustainable Livelihoods**

Similarly, the GRSB's *Principles and Criteria* also fail to recognize the individual interests of ranchers. The ranchers' issues are comparable to the beef workers—but

also distinct in their own way. Today's ranchers face a host of challenges in marketing their cattle, especially lack of competition and fair trade practices in the marketplace. While the GRSB includes social responsibility in its definition of sustainable beef, the criteria fail to recognize—let alone address—the rights of ranchers to engage in a fair and transparent marketplace, where they can earn a fair price, make long-term investments in their ranches, such as improving facilities, undertaking water conservation measures, and maintaining wildlife habitats. Once again, the GRSB's *Principles and Criteria* appear to reflect the narrow interests of a minority of stakeholders that dominate the current beef market paradigm.

## **6. Failure to Address Health Risks from Cattle Feeding Practices**

The GRSB also fails to address serious concerns about potential risks to human health related to conventional beef cattle feeding practices. For example, the known source of infection for Bovine Spongiform Encephalopathy (BSE or Mad Cow Disease) is feedstuffs containing contaminated meat and bone meal. BSE in cattle is linked to the closely related illness in humans, called variant Creutzfeldt-Jakob Disease. Despite USDA rulings prohibiting feeding ruminant remains back to ruminants, it is still legal to feed the rendered remains of pigs and chickens to beef cattle, as well as chicken coop floor wastes or litter. Feeding poultry litter to cattle causes particular concern regarding opportunities for BSE to spread, because poultry feed often contains the rendered remains of slaughtered cattle and a proportion of this feed inevitably ends up in the litter. By refusing to address the feeding of poultry litter, the GRSB has left a loophole whereby the consumption of ruminant remains by cattle is extremely likely to occur. Other issues include feeding practices that favour the development of O157:H7 *E. Coli* in the gut of feedlot cattle. Yet the GRSB does not acknowledge human and animal health risks related to current feeding practices, or consider them as part of a sustainable diet for cattle (see Section 2 below).

## **7. Lack of Traceability in the System**

It is now widely acknowledged that product traceability is key to measuring outcomes in any modern industry. Unfortunately, the GRSB does not consider traceability as a precondition to sustainable practices when it comes to beef production. We believe this is a significant omission: Avoiding *any* criteria on traceability will only benefit the more unscrupulous players who want to avoid accountability, and will do little to address the latent public mistrust of the beef industry. Many consumers want to buy truly sustainable products that protect our environment and public health, deliver social justice, and enhance animal welfare. Without traceability to ensure that all aspects of the supply chain—from birth through processing—meet sustainability criteria there is no guarantee that meat sold as sustainable beef actually is sustainable beef.

The GRSB recognises that some degree of transparency and traceability in the chain may be needed for food safety reasons—for facilitating recalls from *E. coli*-infected feedlot beef for example—but fails to maintain this principle across all aspects of sustainable beef production and marketing.

## **8. Lack of Any Checks and Balances, Verification Systems or Performance Standards**

One of our greatest concerns with the GRSB's *Principles and Criteria* is its failure to provide any credible framework for measuring, identifying and verifying "sustainability" in beef production. It is, in essence, merely an aspirational guide, full of good meaning and intent, but which purposefully leaves open for interpretation the kinds of actions that must be taken to meaningfully comply with the criteria. By failing to set in place any specific goals, targets or measurements, the document has very little meaning and gives little confidence that the beef and feed production industry will make the kinds of changes necessary to achieve true sustainability.

While the GRSB has clearly stated it does not intend to set standards or to create a certification program, many members of GRSB are already making statements about sourcing and retailing sustainable beef. If these criteria are not set into a certification framework—with clear standards and guidelines, audited by independent third parties—how can anyone hope to know how "sustainability" is being defined by these groups or retailers? GRSB members will be free to pick and choose their own criteria from these aspirational guidelines, raising serious questions about the utility of the development of these *Principles and Criteria*. Developing these Principles and Criteria without a framework of support and a pathway toward adoption for producers leaves us questioning the intent behind this initiative in the first place.

## **9. Conclusion**

Several of our organisations commented on the GRSB's draft *Principles and Criteria* document during the public consultation process earlier this year. While some of our concerns have been addressed in this final version, it is clear from the points above that many of the fundamental management problems associated with the industrial confinement beef production model are still being ignored. Until these issues are properly addressed we cannot hope to achieve the kind of changes that are necessary to ensure truly sustainable beef production in the future.

The GRSB's membership may have overwhelmingly approved this document as defining "sustainable beef production," but we—and no doubt many other organizations like us—must overwhelmingly reject the *Principles and Criteria for Global Sustainable Beef*. Unless the GRSB and its local stakeholder processes address the fundamental flaws we have outlined above, this initiative will represent nothing more than an industry-led attempt to greenwash conventional beef production at a time when real, measurable, and verifiable change is so desperately needed.

Signed:

Andrew Gunther, Program Director, A Greener World (Animal Welfare Approved)

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

Carter Dillard, Director of Litigation, Animal Legal Defense Fund

Rebecca Spector, West Coast Director, Center for Food Safety  
Robert Martin, Director of Food System Policy, Center for a Livable Future  
Dave Murphy, Executive Director, Food Democracy Now  
Urvashi Rangan, Director, Consumer Safety and Sustainability, Consumer Reports  
Anna Lappé, Co-Founder, Small Planet Institute  
Patty Lovera, Asst. Director, Food and Water Watch  
Steve Roach, Food Safety Program Director, Farm Animals Concern Trust  
Jose Oliva, Associate Director, Food Chain Workers Alliance  
David Wallinga, MD, Director, Healthy Food Action  
Juliette Majot, President, Institute for Agriculture and Trade Policy  
Chris Hunt, Food Program Director, GRACE Communications Foundation  
Lyn Utesch, Kewaunee CARES (Citizens Advocating Responsible Environmental Stewardship)  
Mark Schultz, Associate Director/Director of Programs, Land Stewardship Project  
Niel Ritchie, League of Rural Voters  
Michael Dimock, President Roots of Change  
Edwin A Yowell III, Chair, SFUSA Policy Steering Committee, Slow Food USA  
Kendra Kimbirauskas, CEO, Socially Responsible Agricultural Project  
Richard Young, Policy Director, Sustainable Food Trust  
Nicole McCann, Director Food Campaigns, Green America  
Ashley Schaeffer Yildiz, Responsible Food Campaigner, Rainforest Action Network

Cc Ruairaidh Petre, Executive Director, Global Roundtable for Sustainable Beef