



April 24, 2015

The Honorable Michael R. Taylor
Deputy Commissioner for Foods
and Veterinary Medicine
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Susan T. Mayne, Ph.D.
Director, Center for Food Safety and
and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Bernadette M. Dunham, D.V.M., Ph.D.
Director, Center for Veterinary Medicine
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Deputy Commissioner Taylor, Dr. Mayne, and Dr. Dunham:

We are writing to inform you that we found 11 samples in our recent tests of 205 imported raw farmed shrimp that had antibiotic residues. We understand from the agency that if the FDA had found residues of the drugs in question the entire shipment associated with each such sample would have been considered adulterated and refused entry into the United States.

We are providing specific details about those findings and request that the FDA investigate. Some of the brands of shrimp in which we found traces of antibiotics were store brands purchased from large retail outfits and 4 of the samples were also certified by the Global Aquaculture Alliance as complying with Best Aquaculture Practices (BAP). Our results raise the question of whether these BAP-labeled shrimp are misbranded and require any labeling enforcement.

The 11 samples represented about 5% of the imported farmed samples we tested. Specifically, we found residues of tetracycline, enrofloxacin, sulfamethoxazole, and sulfamethazine. All residues were confirmed using LC-MS/MS and all samples were tested in duplicate.

All of the shrimp samples we purchased were subjected to extensive microbiology testing and testing for residues of antimicrobial drugs. We tested samples for residues of aminoglycosides, beta-lactams (including cephalosporins), chloramphenicol, lincomycin, macrolides, nitrofurans, quinolones, sulfonamides, tetracyclines, triaryl dyes (malachite green, crystal violet, and metabolites), and virginiamycin.

These samples were part of a larger test conducted by the Consumer Reports Food Safety and Sustainability Center, as part of its regular testing of retail food products. We tested 284 uncooked samples of frozen shrimp from 27 metropolitan areas across the country purchased from March to April of 2014. The sample set included shrimp from 10 different countries of origin and the majority (205 samples) was imported.

Attached for your reference is information on the 11 samples in which our testing found antibiotic residues. The

information includes brand name, retailer, any labeling information, date of purchase, and details on the antibiotics found and their levels.

If you have any additional questions about these samples or our testing please let us know.

Sincerely,



Urvashi Rangan, Ph.D.
Executive Director, Food Safety
and Sustainability Center
Consumer Reports



Michael Crupain, M.D., M.P.H.
Director, Food Safety
and Sustainability Center
Consumer Reports

Shrimp Samples with Antibiotic Residues from Consumer Reports' Tests

Purchase Date	Brand Label	Store	Address	Verbatim Pkg. Desc.	Count	Country Of Origin	Distributor	Lot #	BAP Label	Average Antibiotic Residue*
3/27/14	Fry's & Fry's Marketplace	Fry's Marketplace	3949 East Chandler Boulevard Phoenix, AZ 85048	Raw Shrimp EZ Peel Shell-On Medium	51-60	Vietnam	Fry's Food Stores of Arizona, Inc.	02266 4016 16 0488 2015 SEP 16	No	Oxytetracycline 309ppb
3/28/14	Hy-Vee	Hy-Vee	18101 West 119th Street Olathe, KS 66061	Natural Shrimp Large	51-60	Vietnam	Hy Vee	SEP 06, 2013 14456 3249DDKD	Yes Cert#:10117	Oxytetracycline 53ppb Sulfamethazine 0.8ppb
3/26/14	Kirkland Signature	Costco	501 West Waterfront Drive West Homestead, PA 15120	Raw Tail-On Shrimp No preservatives Chemical- free Peeled Deveined	31-40	Vietnam	CostCo Wholesale Corporation	DEC 27 2014 KKB.4QHSA06 52514	No	Oxytetracycline 21ppb
3/27/14	Kirkland Signature	Costco	501 West Waterfront Drive West Homestead, PA 15120	Raw Tail-On Shrimp	21-25	Vietnam	CostCo Wholesale Corporation	NOV 25.2015 CDI.3BMP621 52514	No	Oxytetracycline 94ppb
3/28/14	Kroger	Kroger	291 North Hubbard Lane Louisville, KY 40207	Uncooked Thailand Farm Raised Shell On Easy Peel	51-60	Thailand	The Kroger Co.	07-14-15 R48	No	Enrofloxacin 14ppb
3/31/14	Kroger	Kroger	1900 North Polk Little Rock, AR 72211	Raw Shrimp Shell - On	51-60	Thailand	The Kroger Co.	07-14 remainder obscured	No	Enrofloxacin 22ppb
3/28/14	None	Sprouts	110 West Sandy Lake Road Coppell, TX 75019	Farm Raised Product of Vietnam Previously Frozen Extra Large Peeled and Deveined Raw Shrimp	26-30	Vietnam	Purchased at seafood counter	None	No	Oxytetracycline 10ppb
3/31/14	Aqua Star	Walmart	7835 150th Street West Apple Valley, MN 55124	Raw, EZ-Peel, Shell-On	60-80	Vietnam	Aqua Star	02266 4029 02 0488	Yes Cert#:10060	Oxytetracycline 19ppb
3/31/14	Walmart	Walmart	9053 Highway 107 Sherwood, AR 72120	Shrimp Raw Peeled Deveined Tail Off Small 60-80	60-80	Vietnam	Wal-Mart Stores, Inc.	05/22/15 08488	Yes Cert#:10095	Oxytetracycline 17ppb
3/31/14	Walmart	Walmart	150 West El Dorado Boulevard Friendswood, TX 77546	Shrimp, Raw, Peeled & Deveined, Tail Off, Small, 60 - 80 shrimp per pound	60-80	Vietnam	Wal-Mart Stores, Inc.	06 02 15 248628 33613	Yes Cert#:10196	Oxytetracycline 9ppb Enrofloxacin 4ppb
3/26/14	Xcellent	Albertsons	10500 Overland Road Boise, ID 83709	Raw HLSO EZP IQF Fresh Water	13-15	Banglade sh	Empress International, LTD.	882/26XV/03 041-03 0045 SUPPLIER CODE 882	No	Oxytetracycline 213 ppb Sulfamethoxazole 6ppb

* Residue levels confirmed by LC-MS/MS

Consumer Reports tested 284 samples of raw frozen shrimp purchased from March to April of 2014 for a variety of drugs that are not approved by the U.S. for use in shrimp farming. This table contains detailed information about the 11 samples that tested positive, and lists the specific drug residues found. All 11 samples were imported farmed shrimp. Importation into the United States of shrimp containing these drugs is illegal. This information is being provided by Consumer Reports to the FDA together with a request that the agency investigate. (Consumer Reports is not alleging wrongdoing by the retailers; the responsibility for preventing entry into the United States lies with the FDA.)

The table lists the (store) brand names of the shrimp that tested positive for these drugs. Based on its limited sampling of the market Consumer Reports cannot make generalizations about any particular brand, processor, importer or retailer. Note also that we purchased multiple samples of most of the brands listed from the same outlet chains, but only found drug residues in some of them. The majority of shrimp tested were negative for antibiotics. Findings regarding the presence of bacteria are reported elsewhere.