Resistance and Responsibility

Antibiotic use in supermarket supply chains

From the Alliance to Save our Antibiotics
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Antibiotic use in supermarket supply chains
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Summary

Most of the UK’s leading supermarkets have commitments to sourcing animal products produced only with responsible antibiotic use.

However, these usually only cover some or all of their own-brand animal produce and frequently only that which is of UK origin. In 2019, the UK imported £6.6bn worth of meat and £3.3bn worth of dairy and eggs, an unknown quantity of which ended up in supermarkets. Since very large amounts of animal-derived food therefore currently fall outside supermarket policies, these need to be extended in scope to ensure that all animal produce sold in their stores is covered by their antibiotics policy.
Key findings of the report:

- All ten leading supermarkets have public antibiotic policies. All supermarkets have a ban on most or all of their UK own-brand suppliers from using antibiotics for routine disease prevention. In 2019, only five supermarkets had such a ban.

- M&S and Iceland are the only supermarkets which apply their antibiotic policies to all their suppliers of animal-derived foods. Iceland’s policy covers own-brand and branded produce and M&S only sells own-brand animal produce.

- The Co-op, Iceland, M&S, Sainsbury’s, Tesco and Waitrose make clear that their policies apply to all their own-brand supply chains, including fresh, frozen, processed and imported produce.

- ASDA, Aldi, Lidl, and Morrisons have policies which do not clearly cover all their own-brand produce. These policies often only cover UK-sourced own-brand fresh produce, such as raw meat, fresh milk and fresh eggs and do not explicitly include animal-derived ingredients in own-brand ready meals and processed food or imported food.

- M&S and Morrisons are the only supermarkets which have banned the use of colistin, a last-resort antibiotic used to treat seriously ill people. Sainsbury’s and Waitrose suppliers also do not use this antibiotic, although no ban is included in their policy.

- M&S, Tesco and Waitrose are the only supermarkets to publish comprehensive, up-to-date data on the total antibiotic use in their supply chains. Morrisons and Sainsbury’s indicate whether their usage is above or below target levels in each species, but mostly they do not give exact figures.

- Very little data is reported by farming system, to show the level of antibiotic use in intensive, free-range, organic or pasture-fed systems. M&S reports some of this information for their 2020 free-range chicken supply and Asda have published data for caged, colony and free-range egg production from 2018.

Progress has been made since the Alliance to Save Our Antibiotics published our last supermarket assessment in 2019. All supermarkets have now prohibited their own-brand suppliers from using antibiotics for routine disease prevention and several supermarkets have increased the level of detail in their policies. However, there is still a lack of data on actual antibiotic usage being published and still virtually no information on usage by farming system. M&S has published some data showing that its free-range chickens have no antibiotic use and its higher-welfare chickens have much lower use than its standard chickens.
Supermarkets need to ensure that the standards they set apply equally to imported and branded food. This is particularly important now that the UK government is seeking to reach new trade deals with non-EU countries which often have weaker regulations governing farm antibiotic use.

The following criteria were used for assessing the supermarkets:

1. Do you have a publicly available policy on farm antibiotic use?
2. NEW: Does the policy cover all your own brand products in your store?
3. NEW: Does the policy cover all branded products in your store?
4. Does the policy ban suppliers from using antibiotics for routine prevention?
5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?
6. Does the policy ban the use of the last-resort antibiotic colistin?
7. Do you monitor antibiotic use in your suppliers?
8. Do you publish antibiotic-usage data?
9. Do you publish antibiotic-usage data by farming system?
10. Do you have an antibiotic-use reduction strategy?
11. NEW: Do you have antibiotic-use reduction targets?
12. NEW: Does the policy cover imported products, including ingredients?
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<td>Waitrose &amp; Partners</td>
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The evidence for each result can be found at the end of the report in annexe 1.
Background

Global increases in meat and dairy consumption, and the rise of intensive methods of production, have resulted in the use of massive amounts of antibiotics in livestock farming. Worldwide approximately 65% of antibiotic consumption occurs in farming \(^1\), the figure is lower in the UK at 30% \(^2\). Resistance to antibiotics caused by the overuse of these medicines in livestock and humans is increasing, and threatens to undermine medical procedures such as hip replacements, cancer chemotherapy, organ transplants and the treatment of preterm babies. It is predicted that if the world doesn’t radically change how antibiotics are used, by 2050 antimicrobial resistance will kill more people than cancer does today.
Why supermarkets?

The UK has ten major supermarkets which collectively have a 95% share of the UK’s grocery market ³ and a 92% share of the UK’s fresh meat market ⁴. Their market dominance makes them extremely influential in how farm animals are raised. This is why the Alliance to Save our Antibiotics is, for the third time, assessing supermarket antibiotics policies to see to what extent antibiotics are or are not being used responsibly in supermarket supply chains.

Our aim is to encourage openness and transparency, so that consumers are better informed when shopping. This transparency is needed since there are currently no labels, other than the organic label and the “Raised without antibiotics” label, which guarantee that antibiotics have not been used routinely in the production of meat, dairy or eggs. The Red Tractor label does not permit preventative group treatments or any use of the last-resort antibiotic colistin for poultry, but it does allow such treatments for other species. Another goal is to ensure that pressure is put on supermarkets to improve their practices. Fortunately, we are seeing some positive developments in policies, but as this report shows major differences remain between the different supermarkets.

More details in policies and the assessment

As supermarkets have become familiar with our assessments and with the problem of antibiotic resistance and the need for action, they have often increased the level of detail in their policies. This is a welcome development which has enabled ASOA to make more informed assessments of the policy positions that supermarkets are taking. In some cases this has resulted in a half mark being awarded where a full mark was given previously. This doesn’t mean that progress is reversing, but rather that the scores have been corrected, not downgraded based on any changes in practice.

Another significant change for our 2021 assessment is that we are assessing the scope of the supermarket policies. In previous years we did not sufficiently differentiate the product lines to which the policies did and did not apply. As we have progressed with this project over the years it has become clear that the policies were not covering a significant proportion of product lines which include animal-derived ingredients. We are now assessing whether the policies apply to only some or all own-brand products, and whether branded and imported produce are also covered. On average 59% of retailers’ sales of all products are branded ⁵, which indicates that very large amounts of animal foods are likely to fall outside policies which are only aimed at own-brand produce.
Domestic standards compared with imports

In the UK, farm antibiotic use has been cut by about 50% between 2014 and 2019. Several factors have contributed to this fall, including voluntary action taken by farmers and farming organisations, the expectation of tighter regulation and the introduction of new supermarket policies. In the European Union (EU), which is the source of a large majority of the UK’s meat, dairy and egg imports, farm antibiotic use is also falling, although some countries like Spain, Italy, Portugal or Poland still have extremely high use. In January 2022, new regulations will ban preventative group treatments with antibiotics throughout the EU (but not in the UK), and this is likely to help drive EU farm antibiotic use down even further.

In addition to EU imports, in many supermarkets it is already possible to buy food made with animal-derived ingredients from around the world - Brazilian beef, New Zealand or Australian lamb, Thai or Brazilian chicken, and meat from “non UK-countries” or “non-EU countries”. At present trade barriers often limit the quantities imported. However, new government trade policies post-Brexit are aimed at reaching new free-trade deals with non-EU countries, and may ultimately remove trade barriers, leading to an increase in imports of animal-derived produce from outside the EU. The most recent new free-trade deal which has been agreed in principle with Australia will lift tariffs on Australian food imports even though Australia has lower standards on animal welfare and continues to use antibiotic growth promoters. Attempts to reach trade deals with other countries like the US or Canada raise similar concerns.

Outside of the EU, animal-welfare, farm-antibiotic regulations and other food and farming standards are often significantly weaker than in the UK and the EU. And unfortunately, the UK government has not committed to applying UK animal welfare standards to imports. As a result, consumer attention has increased on the potential pitfalls regarding food and animal-welfare standards of swapping our main import source from the EU to non-EU countries. Over a million people signed a petition launched by the National Farmers Union in 2020 which says “I call on the UK Government to put into law rules that prevent food being imported to the UK which is produced in ways that would be illegal here”.

There are no UK laws that prevent:

• Giving farm animals antibiotics routinely
• Giving groups of animals preventative antibiotics in feed or drinking water
• Vets prescribing antibiotics for animals they haven’t examined recently
• Using the highest-priority critically important antibiotics (HPCIs) for group treatments or preventative treatments
• Treating farm animals with colistin, an antibiotic of last-resort in human medicine
• Importing animal-derived foods produced with antibiotic growth promoters
• Importing animal-derived foods produced to lower welfare standards than are legal in the UK.
If supermarkets do decide to increase their imports of animal produce, it will be even more important for them to set uniform standards for their UK and imported produce. In the past year, some supermarkets have been making encouraging statements regarding the food standards they will be setting for imports. The Tesco CEO has said “Whatever the trade deals are we, like other retailers, will look at them, but what we won’t do is give up our standards as we look at those opportunities” and the Waitrose CEO said “We will never sell any Waitrose product that does not meet our own high standards” and “It would be simply wrong to maintain high standards at home yet import food from overseas that has been produced to lower standards”. However, some other supermarkets have not been as clear with their positions, and as the findings in this assessment show, supermarket antibiotic policies are not currently being applied equally to UK and imported produce.

**The Food Industry Initiative on Antimicrobials**

The Food Industry Initiative on Antimicrobials (FIIA) is a new group which brings together retailers, manufacturers, processors and food-service companies with the aim of producing and promoting a uniform antibiotics policy across the industry, avoiding duplication of effort. Nine of the ten leading supermarkets are FIIA members. Only Iceland has not joined the group.

The establishment of the FIIA is a largely welcome development, which has probably contributed to some of the recent improvements in supermarket antibiotic policies. None of the supermarkets which are FIIA members now allow routine preventative antibiotic use, as this is also a FIIA policy. Similarly, FIIA policy restricts the use of HPCIs, and similar rules are in place in most FIIA supermarkets.

On the other hand, the FIIA has not encouraged members to ban the use of colistin, the last-resort antibiotic used in human medicine to treat certain highly antibiotic-resistant and life-threatening infections. And as this assessment finds, so far only M&S and Morrisons have such a ban in place, although four supermarkets say their suppliers are not using the antibiotic.

Furthermore, the FIIA has not encouraged supermarkets to publish the antibiotic-usage data they already possess. While the FIIA does support and promote the collection of standardised antibiotic-usage data, it argues against publishing data which is not sufficiently representative.

It also claims, controversially, that any differences in usage between different FIIA members are “inherent and should not be exploited commercially”. In reality there is no good reason for best practice not to be adopted across the industry, and for low levels of antibiotic usage to be required by all supermarkets.

**In 2019 the UK imported**

- £6.6bn of meat
- £3.3bn of dairy and eggs
- £3.5bn of fish
of their supply chains. In addition, the publication of antibiotic-usage data increases transparency, so long as supermarkets make clear what their data coverage is and how representative it is, and this in turn creates pressure for improvements to occur.

**Responsible Use of Medicines in Agriculture (RUMA) targets**

The industry group RUMA, which brings together farmers, veterinarians and the pharmaceutical industry, has established a Targets Taskforce which has set antibiotic-reduction targets for all farmed species in the UK. RUMA is also a member of the FIJA and several supermarkets which have committed to reducing their antibiotic use have adopted the RUMA targets as their benchmark. Most of the supermarkets which have published usage data or their progress against the RUMA targets, are reporting that their usage levels are already below RUMA targets and industry averages.

In some cases, this is due to the fact that RUMA targets, and therefore supermarket targets, and not ambitious enough. The Alliance to Save our Antibiotics believes that significantly lower targets need to be set for certain species, in particular for pigs and poultry. Large, intensive producers such as Denmark and the Netherlands are already producing at less than half the 2020 RUMA target for pigs. Less intensive producers like Sweden are producing at 20% of the 2020 RUMA target for pigs.
## Tracking progress

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<td>5. HPCIAs restricted</td>
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<td>8.5/10</td>
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<tr>
<td>6. Bans colistin</td>
<td>2/10</td>
<td>2.5/10</td>
<td>3/10</td>
<td></td>
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<td>7. Monitors antibiotic use</td>
<td>6/10</td>
<td>8.5/10</td>
<td>8/10</td>
<td></td>
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<td>8. Publishes antibiotic-usage data</td>
<td>1/10</td>
<td>4.5/10</td>
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<td>9. Publishes data by farming system</td>
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<td>0.5/10</td>
<td>1/10</td>
<td></td>
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<td>10. Reduction strategy in place</td>
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<td>8/10</td>
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<td>n/a</td>
<td>3.5/10</td>
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1 point for yes, 0.5 point for yes/no
Results from November online survey of UK adults*

71% of people think supermarkets should apply their antibiotics policy to their entire own-brand range, regardless of where the ingredients come from, only 6% thought they shouldn’t.

76% of people think supermarkets shouldn’t sell imported meat, fish, dairy or eggs that don’t meet UK farm animal welfare standards, 10% think they should.

45% of people don’t trust supermarkets to source food from supply chains that use antibiotics responsibly, while 31% do trust them.

Only 15% would trust that they were using antibiotics responsibly in their supply chains if they weren’t publishing the usage data.

74% of people think that supermarkets should publish their antibiotic usage data, only 8% think they shouldn’t.

64% of people wouldn’t trust that a supermarket was using antibiotics responsibly if they weren’t publishing their antibiotic usage data.

* All figures are from YouGov UK. Total sample size was 2105 adults. Fieldwork was undertaken between 5th - 7th November 2021. The survey was carried out online. The figures have been weighted and are representative of all UK adults (aged 18+).
Are the big brands taking antibiotic use seriously?

**Kerry Foods**, the owner of Richmond sausages, Fridge Raiders and Mattessons, has no published policy on antibiotics. The only information available online is this statement: “we will work with suppliers and industry partners to help promote good animal welfare practices and address issues of concern, including the responsible use of antibiotics”.

**Unilever**, which owns Hellman’s, Knorr, Magnum, Ben & Jerry’s, Carte D’or, Cornetto, Solero, Vienetta and Walls, says “Hormones and antibiotics must be used prudently with the aim of optimising therapeutic efficacy and minimising the development of antibiotic resistance. Products or equivalent products (e.g. fluoroquinolones) that can be used to treat human disease must not be used unless deemed necessary by a vet”.

**Heinz**, the UK’s most popular food brand, says “Antimicrobials should only be used after careful review by a veterinarian and treatment limited to ill and at-risk animals, treating the fewest animals possible. Alongside good farm management, responsible antimicrobial use can help enhance food quality and safety.”

**Birds Eye** has no published antibiotics policy, however their website states “Antibiotics should be used carefully, only when necessary, and never to promote growth.”

**Mondelez**, which owns Cadbury, Belvita, Milka, Philadelphia and Dairylea, amongst many others across the world, has no published antibiotics policy. They only say “Responsible use of medically important antibiotics is needed to support the health and welfare of dairy animals. However, we believe antibiotics and/or hormones should be used only as necessary and appropriate to maintain animal health”.

These are representative examples of some of the leading brands sold in the UK, not a full survey of the branded-food sector in the UK.
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<thead>
<tr>
<th></th>
<th>Question</th>
<th>Compliance</th>
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<tbody>
<tr>
<td>1.</td>
<td>Do you have a publicly available policy on farm antibiotic use?</td>
<td>Yes</td>
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<tr>
<td>2.</td>
<td>NEW: Does the policy cover all your own brand products in your store?</td>
<td>No</td>
</tr>
<tr>
<td>3.</td>
<td>NEW: Does the policy cover all branded products in your store?</td>
<td>No</td>
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<tr>
<td>4.</td>
<td>Does the policy ban suppliers from using antibiotics for routine prevention?</td>
<td>Yes</td>
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<tr>
<td>5.</td>
<td>Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?</td>
<td>Yes</td>
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<tr>
<td>6.</td>
<td>Does the policy ban the use of the last-resort antibiotic colistin?</td>
<td>No</td>
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<tr>
<td>7.</td>
<td>Do you monitor antibiotic use in your suppliers?</td>
<td>Yes</td>
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<td>8.</td>
<td>Do you publish antibiotic-usage data?</td>
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<td>9.</td>
<td>Do you publish antibiotic-usage data by farming system?</td>
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<td>10.</td>
<td>Do you have an antibiotic-use reduction strategy?</td>
<td>Yes</td>
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<tr>
<td>11.</td>
<td>NEW: Do you have antibiotic-use reduction targets?</td>
<td>No</td>
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<tr>
<td>12.</td>
<td>NEW: Does the policy cover imported products, including ingredients?</td>
<td>No</td>
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**Overall comment:**
Aldi’s policy covers all of its fresh, own-brand produce, but it has no policies for frozen, processed or branded products containing animal-derived ingredients. Aldi does recognise that improving husbandry and changing farming systems can have an impact on antibiotic use. Their policy says, “Farming systems to prevent disease should be put in place” and that “reduction or eradication of endemic disease via changes to farm infrastructure and management strategies.” Aldi already has higher-welfare lines of pig and poultry meat, but unfortunately it does not publish antibiotic-usage data for these lines or for its lower-welfare produce.

**Progress they’ve made since last assessment:**
Aldi has now banned routine preventative antibiotic use for its fresh own-brand produce.

**Key things they’re doing well:**
Aldi has a detailed antibiotic-reduction plan which recognises the importance of farming practices.

**Recommended improvement:**
The scope of the policy needs to be increased to include frozen, processed and branded food. Antibiotic-usage data, including by farming system, should be published. Aldi should ban the use of colistin.
1. Do you have a publicly available policy on farm antibiotic use? ✓
2. NEW: Does the policy cover all your own brand products in your store? ✗
3. NEW: Does the policy cover all branded products in your store? ✗
4. Does the policy ban suppliers from using antibiotics for routine prevention? ✓
5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments? ✗
6. Does the policy ban the use of the last-resort antibiotic colistin? ✗
7. Do you monitor antibiotic use in your suppliers? ✗
8. Do you publish antibiotic-usage data? ✗
9. Do you publish antibiotic-usage data by farming system? ✗
10. Do you have an antibiotic-use reduction strategy? ✗
11. NEW: Do you have antibiotic-use reduction targets? ✗
12. NEW: Does the policy cover imported products, including ingredients? ✗

**Overall comment:**
Asda’s policy is not sufficiently transparent. It is unclear what produce is covered by the policy. Furthermore, Asda has not published any up-to-date data on its antibiotic usage, with the most recent data being for 2018. Asda also has no clear antibiotic-reduction strategy. Its policy states “Asda endorses the statement that ‘antibiotics must not be used to compensate for poor hygiene or inadequate husbandry conditions or where improvements in animal husbandry could reduce the need for antibiotic treatment”’. However, despite saying that it supports this statement, it does not make clear whether antibiotics are used to support poor hygiene or husbandry in its own supply chain, nor does it commit to reducing use through improvements in hygiene or husbandry.

**Progress they’ve made since the last assessment:**
Asda’s policy now bans suppliers from using antibiotics for routine disease prevention. This wasn’t the case in 2019.

**Key things they’re doing well:**
Asda now has a clear ban on routine preventative antibiotic use.

**Recommended improvement:**
Asda needs to make clear the scope of its policy. It needs to introduce a proper antibiotic-reduction strategy. Antibiotic-usage data needs to be collected and published. The use of colistin should be banned and restrictions are needed on the use of HPClAs. The policy says they use 3rd and 4th generation cephalosporins when veterinary guidance justifies use, but all use of antibiotics is under veterinary prescription and guidance. Asda has not published any antibiotic-usage data since our last assessment, the publication of more recent usage data would be welcome.
1. Do you have a publicly available policy on farm antibiotic use?  
2. NEW: Does the policy cover all your own brand products in your store?  
3. NEW: Does the policy cover all branded products in your store?  
4. Does the policy ban suppliers from using antibiotics for routine prevention?  
5. Does the policy restrict the use of the "high-priority critically important antibiotics" (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?  
6. Does the policy ban the use of the last-resort antibiotic colistin?  
7. Do you monitor antibiotic use in your suppliers?  
8. Do you publish antibiotic-usage data?  
9. Do you publish antibiotic-usage data by farming system?  
10. Do you have an antibiotic-use reduction strategy?  
11. NEW: Do you have antibiotic-use reduction targets?  
12. NEW: Does the policy cover imported products, including ingredients?

**Overall comment:**  
Co-op has one of the most detailed antibiotics policies of all the supermarkets for its own-brand produce, and has clearly set out the detail of the working groups which have been established to continue to improve on their reductions and responsible use. Co-op recognises the importance of good husbandry and of using resilient breeds for reducing antibiotic use. However, the Co-op does not currently publish any antibiotic-usage data which undermines its claim that it has a transparent supply chain.

**Progress they’ve made since the last assessment:**  
Co-op has improved the level of detail in its antibiotic-reduction strategy. However, the main change since our last assessment is that they no longer publish the data regarding the level of antibiotics used in their supply chains.

**Key things they’re doing well:**  
Co-op has banned the routine use of antibiotics for disease prevention, restricted the use of HPCIAAs and applies this to all of their UK supply chains. The policy is also clear about its scope (own-brand produce).

**Recommended improvement:**  
Monitoring of antibiotic use is currently restricted to their Farming Groups but should be extended to all of their supply chains, and the publication of their antibiotic-use data needs to be reinstated. Colistin must be completely banned. Co-op should work to extend their policies to branded produce.
Iceland

1. Do you have a publicly available policy on farm antibiotic use? ✓
2. NEW: Does the policy cover all your own brand products in your store? ✓
3. NEW: Does the policy cover all branded products in your store? ✓
4. Does the policy ban suppliers from using antibiotics for routine prevention? ✓
5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments? ✗
6. Does the policy ban the use of the last-resort antibiotic colistin? ✗
7. Do you monitor antibiotic use in your suppliers? ✗
8. Do you publish antibiotic-usage data? ✗
9. Do you publish antibiotic-usage data by farming system? ✗
10. Do you have an antibiotic-use reduction strategy? ✗
11. NEW: Do you have antibiotic-use reduction targets? ✗
12. NEW: Does the policy cover imported products, including ingredients? ✓

**Overall comment:**
Iceland is the only supermarket that is not yet a member of the FIIA and until earlier this year it was the only supermarket that had no published antibiotic policy. It now has a short statement on its website which says that none of its suppliers are permitted to use antibiotics for prophylaxis. Iceland still has no other antibiotic policies.

**Progress they’ve made since the last assessment:**
Iceland now has a two-sentence antibiotic policy banning prophylactic antibiotic use for all its suppliers.

**Key things they’re doing well:**
Iceland’s only published antibiotic policy is their ban on using antibiotics for prophylaxis. Iceland does however make clear that this applies to “any products supplied to Iceland”.

**Recommended improvement:**
Iceland needs to introduce a detailed antibiotic-reduction strategy. It also needs to introduce restrictions on the HPCIAAs, to ban its suppliers from using colistin, and to collect and publish detailed antibiotic-usage data and reduction targets.
1. Do you have a publicly available policy on farm antibiotic use? ✔
2. NEW: Does the policy cover all your own brand products in your store? ✗
3. NEW: Does the policy cover all branded products in your store? ✗
4. Does the policy ban suppliers from using antibiotics for routine prevention? ✔
5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments? ✔
6. Does the policy ban the use of the last-resort antibiotic colistin? ✗
7. Do you monitor antibiotic use in your suppliers? ✔
8. Do you publish antibiotic-usage data? ✔
9. Do you publish antibiotic-usage data by farming system? ✗
10. Do you have an antibiotic-use reduction strategy? ✔
11. NEW: Do you have antibiotic-use reduction targets? ✔
12. NEW: Does the policy cover imported products, including ingredients? ✗

**Overall comment:**
Lidl’s policy clearly prohibits the use of antibiotics for routine disease prevention and has good restrictions of the HPClAs. They have adopted RUMA’s reduction targets but nearly all the data they publish on their website are industry averages rather than the usage levels of Lidl suppliers. The policy covers almost all UK own-brand produce, but not imported or branded animal-derived products or ingredients. It is encouraging to note that the policy says it will “evolve in future iterations to expand in scope and expectation”.

**Key things they’re doing well:**
Lidl is clear about the scope of its policy. Routine disease prevention is clearly banned for most of their UK produce.

**Recommended improvement:**
Lidl needs to expand the scope of the policy to include imported and branded produce and the small amount of UK own-brand produce not currently covered. Much better antibiotic-usage data should be collected and published. The use of colistin should be banned.

**Progress they’ve made since the last assessment:**
Lidl has significantly improved since our first assessment in 2017, when they had no published policy. However, there has been no major change since the last assessment and Lidl still only publishes usage data for its chicken supplier chain.
1. Do you have a publicly available policy on farm antibiotic use? 🔄

2. NEW: Does the policy cover all your own brand products in your store? 🔄

3. NEW: Does the policy cover all branded products in your store? 🔄

4. Does the policy ban suppliers from using antibiotics for routine prevention? 🔄

5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments? 🔄

6. Does the policy ban the use of the last-resort antibiotic colistin? 🔄

7. Do you monitor antibiotic use in your suppliers? 🔄

8. Do you publish antibiotic-usage data? 🔄

9. Do you publish antibiotic-usage data by farming system? 📈

10. Do you have an antibiotic-use reduction strategy? 🔄

11. NEW: Do you have antibiotic-use reduction targets? 🔄

12. NEW: Does the policy cover imported products, including ingredients? 🔄

**Overall comment:**
M&S has the most comprehensive antibiotics policy and should be recognised as an example of best practice for retailers. M&S don’t sell branded food products containing animal produce, and the majority of their animal produce is from the UK which means it has excellent control over the application of their standards. It publishes antibiotic-usage data for all species, but only give usage by farming system for chickens. Its usage data for chickens shows zero antibiotic use in its free-range chicken supply chain. We are pleased to see that usage for its “higher-welfare” birds, which are kept at a lower stocking density and are slower-growing breeds, is five times lower than for its standard range.

**Progress they’ve made since the last assessment:**
M&S now publishes up-to-date antibiotic-usage data. For chickens it has published its first usage data by farming system.

**Key things they’re doing well:**
M&S has a nearly perfect score in this assessment and is only lacking on the amount of data it publishes by farming system. Alongside Morrisons it is one of only two supermarkets to have completely banned the use of colistin, an antibiotic of last-resort in human medicine. It has also made a Better Chicken commitment: by 2026 all of its chicken production will be of slower-growing breeds and kept with a lower stocking density. This commitment to improving chicken health and welfare is likely to further reduce antibiotic use.

**Recommended improvement:**
The only area for improvement is on the publication of its data by farming system for species other than chickens. Data for organic chickens is also needed. Publication of antibiotic-usage by farming system is useful for the industry as a whole, as well as for scientists and those working to reduce antibiotic use in farming, as it shows how good husbandry and appropriate breeds are key to achieving low levels of disease and antibiotic use.
Overall comment: Morrisons’s policy commitments apply to UK, own-brand, fresh products, but not imported or branded products or ingredients in processed foods.

Progress they’ve made since the last assessment: Morrisons has extended its ban on using antibiotics routinely to all own-brand produce. Previously only pork had been covered by this ban. Similarly, an existing ban on the use of colistin in its UK fresh pork supply chains has been extended to all species for their fresh UK supply by 2020. Although Morrisons still has no published antibiotic-usage data, it does now indicate whether its suppliers have met RUMA on antibiotic usage.

Key things they are doing well: Morrisons, alongside M&S, have an industry-leading ban in place on the use of colistin in its supply of fresh meat and dairy from the UK.

Recommended improvement: Morrison’s should be clearer which product lines its policy does and doesn’t cover. The overall scope of the policy needs to be extended to cover frozen, processed and imported produce. Antibiotic-usage data should be published. Morrisons say that there are industry concerns about publishing data, but these concerns can be overcome by collecting representative data using a methodology which is similar or identical to other industry bodies.
# Sainsbury’s

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>1</td>
<td>Do you have a publicly available policy on farm antibiotic use?</td>
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<td>2</td>
<td>NEW: Does the policy cover all your own brand products in your store?</td>
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<tr>
<td>3</td>
<td>NEW: Does the policy cover all branded products in your store?</td>
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<tr>
<td>4</td>
<td>Does the policy ban suppliers from using antibiotics for routine prevention?</td>
<td>✓</td>
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<tr>
<td>5</td>
<td>Does the policy restrict the use of the &quot;high-priority critically important antibiotics&quot; (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?</td>
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<tr>
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<td>Does the policy ban the use of the last-resort antibiotic colistin?</td>
<td>✗</td>
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<tr>
<td>7</td>
<td>Do you monitor antibiotic use in your suppliers?</td>
<td>✓</td>
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<tr>
<td>8</td>
<td>Do you publish antibiotic-usage data?</td>
<td>✗</td>
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<td>9</td>
<td>Do you publish antibiotic-usage data by farming system?</td>
<td>✗</td>
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<td>10</td>
<td>Do you have an antibiotic-use reduction strategy?</td>
<td>✓</td>
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<td>11</td>
<td>NEW: Do you have antibiotic-use reduction targets?</td>
<td>✓</td>
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<tr>
<td>12</td>
<td>NEW: Does the policy cover imported products, including ingredients?</td>
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## Overall comment:
Sainsbury’s antibiotics policy, which only covers own-brand produce, sits within their wider animal-welfare policy and has a good overarching principle: “Our focus is on preventing the need for antimicrobial intervention, by improving the overall health status on our supplying farms.” The policy includes good restrictions on the HPCIAIs, which are now only minimally used for own-brand produce. There has been no use of colistin in 2019 and 2020, even though no ban is in place. Sainsbury’s indicates whether it is meeting RUMA targets for each species.

## Progress they’ve made since the last assessment:
Sainsbury’s now publishes data on its use of High Priority Critically Important antibiotics and indicates whether its overall usage meets RUMA targets for each species.

## Key things they are doing well:
Sainsbury’s no longer uses colistin for its own-brand produce.

## Recommended improvement:
Sainsbury’s needs to extend their policy to cover branded and imported produce. More detailed antibiotic-usage data, including by farming system is needed.
Tesco has a detailed antibiotic policy which clearly sets out how their commitments and targets are being met for each species. It provides good data on antibiotic usage, but there is still little information on the differences in antibiotic usage by farming system. The policy clearly states that it covers all own-label products.

**Overall comment:**
Tesco has a detailed antibiotic policy and progress document which clearly sets out how their commitments and targets are being met for each species. It provides good data on antibiotic usage, but there is still little information on the differences in antibiotic usage by farming system. The policy clearly states that it covers all own-label products.

**Progress they’ve made since the last assessment:**
There are no major changes to their policy since 2019.

**Key things they are doing well:**
Very thorough reporting of the antibiotic use data which is published on their website. Their reporting is particularly interesting for pigs as it captures data not only from the UK but also from their Italian, Spanish and a combined UK/Danish supply chain. The data is also published alongside analysis which explains some of the usage and reduction progress which is a very good level of transparency.

**Recommended improvement:**
The scope of the policy needs to be extended to ensure it covers all products in the store. There is a need to ban the use of colistin, which Tesco says is already not used in the pig, poultry and lamb supply chains. Antibiotic-usage data should be improved by publishing data on free-range, organic and pasture-fed.

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1. Do you have a publicly available policy on farm antibiotic use? ✓
2. NEW: Does the policy cover all your own brand products in your store? ✓
3. NEW: Does the policy cover all branded products in your store? ✗
4. Does the policy ban suppliers from using antibiotics for routine prevention? ❑
5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments? ✓
6. Does the policy ban the use of the last-resort antibiotic colistin? ✗
7. Do you monitor antibiotic use in your suppliers? ✓
8. Do you publish antibiotic-usage data? ✓
9. Do you publish antibiotic-usage data by farming system? ✗
10. Do you have an antibiotic-use reduction strategy? ✓
11. NEW: Do you have antibiotic-use reduction targets? ✓
12. NEW: Does the policy cover imported products, including ingredients? ✗
## RESISTANCE AND RESPONSIBILITY

### Overall comment:
Waitrose has one of the most comprehensive supermarket antibiotic policies, which covers all its own-brand produce, including fresh, frozen, ingredients and imports. Brands are not yet within the scope of their policy, but Waitrose has said it will work to achieve positive change for animal welfare within branded products. Waitrose's antibiotic policy is part of its animal welfare policy, and the supermarket emphasises that keeping animals healthy is key to avoiding antibiotic misuse. It has established a Livestock Steering Group to drive improvements in health, welfare and antibiotic use across the supply chain.

### Key things they are doing well:
Waitrose has pledged to end the use of HPCIA's across all their supply chains. It has also made a Better Chicken commitment: by 2026 all of its chicken production will be of slower-growing breeds and kept with a lower stocking density. This commitment to improving chicken health and welfare is likely to reduce antibiotic use.

### Recommended improvement:
The scope of the policy still needs to be extended to cover all branded produce, including imports. Waitrose sells several higher-welfare, or free-range or organic lines, but does not yet give antibiotic usage by farming system. Publishing such data is likely to provide further evidence that improving husbandry and using more resilient breeds can reduce antibiotic use. Waitrose needs to introduce a clear ban on the use of colistin.

### Progress they’ve made since the last assessment:
There have been no major changes since our last assessment, although the policy is no longer clear that the use of colistin is not permitted and now only says that it is not used.

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### Table: Waitrose Antibiotic Policy

<table>
<thead>
<tr>
<th>Question</th>
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<tr>
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RESISTANCE AND RESPONSIBILITY
RESISTANCE AND RESPONSIBILITY
Conclusion

UK supermarkets have made significant improvements over the past few years to their rules on antibiotic use for their UK-based own-brand supply chains.

It is particularly welcome that all ten supermarkets now have a prohibition on routine preventative antibiotic use for most or all of these suppliers. Improvements in supermarket actions have undoubtedly contributed to a significant reduction in British farm antibiotic use over the past five or six years.

However, the government is currently seeking to agree new trade deals with non-EU countries. This raises the possibility that tariffs will be lifted on the importation of animal foods produced with routine antibiotic use, and sometimes even with the use of antibiotic growth promoters. It is therefore more important than ever for supermarkets to apply their standards equally to all of their suppliers. Supermarkets need to work on developing policies which cover all of their own-brand and branded products, whether UK-produced or imported.

All the supermarkets, apart from Iceland, are now coordinating their actions on UK farm antibiotic use via the Food Industry Initiative on Antimicrobials. Having realised that the importance of the issue of antibiotic resistance required them to work together, supermarkets should extend this joint approach and set minimum standards for imports. They should also use their enormous buying power to ensure that any branded foods they continue to sell are not produced with irresponsible farm antibiotic use.
Annexe 1: Evidence for scoring

1. Do you have a publicly available policy on farm antibiotic use?
   Yes: “ALDI GB & IE RESPONSIBLE ANTIBIOTIC USE POLICY Version: 1.0 Created: 30 January 2018”
   And: ALDI UK Animal Welfare Policies and Performance Updated May 2020

2. NEW: Does the policy cover all your own brand products?
   No – “Scope: All own-label fresh primary poultry, meat, eggs, dairy and farmed fish”. Frozen and processed products are not covered by their policy.

3. NEW: Does the policy cover all branded products?
   No – the policy only covers animals raised in the UK for own-label fresh primary poultry, meat, eggs, dairy and farmed fish.

4. Does the policy ban suppliers from using antibiotics for routine prevention?
   Yes - “Routine prophylactic antimicrobial use is not permitted.”

5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity testing shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?
   Yes – “3rd and 4th generation cephalosporins, colistin and fluoroquinolones must not be used on supplying farms other than in exceptional circumstances where welfare problems would otherwise occur, and where their use is backed up by appropriate bacteriology or other epidemiological evidence.”

6. Does the policy ban the use of the last-resort antibiotic colistin?
   No – see above, restricted but not banned.

7. Do you monitor antibiotic use in your suppliers?
   Yes – “We record welfare outcome data and antibiotic usage from our fresh pork and chicken suppliers monthly, and fresh milk suppliers annually. We require these suppliers to submit data through our welfare reporting platform, managed by The Evidence Group. The ALDI UK CR team assess progress quarterly with The Evidence Group, it is reviewed against the industry benchmark and performance is communicated to the business. We work collaboratively with our suppliers to take action when targets are not met.”
8. Do you publish antibiotic-usage data?
   No - no evidence

9. Do you publish antibiotic-usage data by farm system?
   No - no evidence

10. Do you have an antibiotic-use reduction strategy?
    Yes - ‘ALDI suppliers should be working with their producers towards a rational reduction in the use of antibiotics within agriculture. Reduction in quantities should be implemented within the constraints of long-term sustainability. For example, through practices that reduce the number of animals requiring treatment rather than decreasing the dosage or period of treatment. Decreasing the dosage or period of treatment may inhibit efficacy or hasten the development of antibiotic resistance.’

11. NEW: Do you have antibiotic-use reduction targets?
    No – no evidence

12. NEW: Does the policy cover imported products, including ingredients?
    No - no evidence

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1. Do you have a publicly available policy on farm antibiotic use?
   Yes - Asda antibiotics policy “Reducing antibiotics in food production 2018”

2. NEW: Does the policy cover all your own brand products?
   No - no evidence.

3. NEW: Does the policy cover all branded products?
   No - no evidence.

4. Does the policy ban suppliers from using antibiotics for routine prevention?
   Yes – “Asda policy is that the routine prophylactic use of antibiotics is not permitted in our supply chain.”

5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity testing shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?
   Yes/no - “We are working with suppliers to ensure the use of 3rd and 4th generation cephalosorhins [sic] and fluoroquinolones is limited to situations where veterinary guidance justifies the use.”

6. Does the policy ban the use of the last-resort antibiotic colistin?
   No

7. Do you monitor antibiotic use in your suppliers?
   Yes/No - last published monitoring was in 2018, no mention of a commitment to monitoring use since then.

8. Do you publish antibiotic-usage data?
   Yes/No – No new data has been published since our last assessment but previously published data for 2018 is still available.
9. Do you publish antibiotic-usage data by farm system?
   Yes/No - antibiotic-use data for egg-laying hens is separated into caged and free-range systems.

10. Do you have an antibiotic-use reduction strategy?
    No – no evidence.

11. NEW: Do you have antibiotic-use reduction targets?
    No – no evidence.

12. NEW: Does the policy cover imported products, including ingredients?
    No – no evidence.

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**Co-op**

1. Do you have a publicly available policy on farm antibiotic use?
   Yes – (p40 onwards) Co-op Animal Welfare Standards & Performance & Co-op Antibiotics Policy

2. NEW: Does the policy cover all your own brand products in your store?
   Yes - “Our antibiotic usage policy is in place for our full supply chain and applies to all suppliers and farmers producing livestock and aquaculture products for Co-op’s own brand range including ingredients.”

3. NEW: Does the policy cover all branded products in your store?
   No - no evidence

4. Does the policy ban suppliers from using antibiotics for routine prevention?
   Yes - “Reductions in antibiotics use can be achieved by ceasing unnecessary routine treatments, including routine prophylactic treatment of farm animals. The routine prophylactic administration of antibiotics is therefore not permitted within Co-op Supply chain.” Also - “Animals are not routinely given antibiotics, they are only given to animals or groups of animals which are demonstrating clinical signs of illness.”

5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?
   Yes - “prohibit the use of these [HPClIA]s within our supply chain, unless used as a treatment of last resort where usage can be supported by relevant diagnostic tests (under veterinary advice), to protect animal welfare.”

6. Does the policy ban the use of the last-resort antibiotic colistin?
   No - Colistin use is not banned, but restricted in the same way as the other HPClIA.

7. Do you monitor antibiotic use in your suppliers?
   Yes/No - “Currently we record, measure and benchmark antibiotic usage within our Farming Groups. We aim to widen this data collection to our full supply chain”

8. Do you publish antibiotic-usage data?
   No - Co-op did publish data in previous years, but has since deleted it.
9. Do you publish antibiotic-usage data by farming system?  
No – no evidence.

10. Do you have an antibiotic-use reduction strategy?  
Yes – “Co-op strives to achieve the outputs from The Targets Task Force formed in 2016 with the specific aim of delivering on the Government objective of identifying sector-specific targets for the reduction, refinement and replacement of antibiotics in food-producing animals.” The detail the policy includes on the “3 Rs framework” (Reduce, Replace, Refine) explains how the Co-op is attempting to reduce antibiotic use.

11. NEW: Do you have antibiotic-use reduction targets?  
Yes – “We will continue to be members of RUMA and deliver against the RUMA Targets Task Force species targets.”

12. NEW: Does the policy cover imported products, including ingredients?  
No - no evidence. Co-op does not import any animal foods for its own-brand lines, but its imported branded foods are not covered by the policy.

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Iceland

1. Do you have a publicly available policy on farm antibiotic use?  
Yes – [Iceland Animal Welfare]

2. NEW: Does the policy cover all your own brand products in your store?  
Yes – Iceland’s very limited antibiotic policy applies to “any animal that is intended to be used for the manufacture of any products supplied to Iceland”.

3. NEW: Does the policy cover all branded products in your store?  
Yes – as above.

4. Does the policy ban suppliers from using antibiotics for routine prevention?  
Yes – “Iceland’s antibiotics policy clearly states that prophylactic use of antimicrobials, where the antibiotics are administered before showing clinical signs of any disease, is not permitted on any animal that is intended to be used for the manufacture of any products supplied to Iceland. This is a contractual obligation for our suppliers overseen by our technical team.”

5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?  
No – no evidence.

6. Does the policy ban the use of the last-resort antibiotic colistin?  
No – no evidence.

7. Do you monitor antibiotic use in your suppliers?  
No – no evidence.

8. Do you publish antibiotic-usage data?  
No – no evidence.
9. Do you publish antibiotic-usage data by farming system? 
   No – no evidence.

10. Do you have an antibiotic-use reduction strategy? 
    No – no evidence.

11. NEW: Do you have antibiotic-use reduction targets? 
    No – no evidence.

12. NEW: Does the policy cover imported products, including ingredients? 
    Yes - Iceland’s antibiotic policy applies to “any animal that is intended to be used for the manufacture of any products supplied to Iceland”

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1. Do you have a publicly available policy on farm antibiotic use? 
   Yes Lidl GB Antibiotic Stewardship Policy October 2021

2. NEW: Does the policy cover all your own brand products in your store? 
   Yes/No - “The scope of this policy covers the Lidl GB British own label chicken, turkey, pork, beef, lamb, eggs, liquid milk, cheese and RSPCA assured salmon;” Good to see this level of detail, but it does show that not all animal products are included.

3. NEW: Does the policy cover all branded products in your store? 
   No - no evidence

4. Does the policy ban suppliers from using antibiotics for routine prevention? 
   Yes - “We do not permit routine prophylactic use of antibiotics.”

5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments? 
   Yes - “The use of 3rd and 4th generation Cephalosporins and Fluoroquinolones, together with Colistin, should only be used under veterinary permission, as a last resort, demonstrated by culture and sensitivity testing, or in exceptional circumstances when all else has failed. The use of these HP-CIA medicines should be restricted, without compromising animal welfare.”

6. Does the policy ban the use of the last-resort antibiotic colistin? 
   No – As above, restricted but not banned.

7. Do you monitor antibiotic use in your suppliers? 
   Yes - “We monitor antibiotic use in our supply chains through a range of measures, actively working with the following industry bodies to successfully monitor and reduce the overall use of antibiotics: FIIA, RUMA, Red Tractor Assurance, RSPCA Assurance, AHDB e-Med Hub/ EMB-Pigs, BPC, individual CSR plans with our strategic suppliers”.

8. Do you publish antibiotic-usage data? 
   Yes/No – Only recent published data
9. **Do you publish antibiotic-usage data by farming system?**
No - no evidence.

10. **Do you have an antibiotic-use reduction strategy?**
Yes - “We encourage our producers to optimise welfare, health, hygiene, husbandry and biosecurity of animals in order to reduce the need for antibiotic treatment. Therefore, antibiotics must not be used as a replacement for good farm management.”

11. **NEW: Do you have antibiotic-use reduction targets?**
Yes - have adopted RUMA’s targets into their own policy. “The targets table below refers to national targets set by The RUMA Targets Taskforce, which we fully endorse and adopt as our policy”

12. **NEW: Does the policy cover imported products, including ingredients?**
No – “The scope of this policy covers the Lidl GB British own label…”

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**MARKS & SPENCER**

1. **Do you have a publicly available policy on farm antibiotic use?**
Yes - [ANTIBIOTIC USAGE POLICY IN M&S SOURCED LIVESTOCK AND AQUACULTURE](https://www.sainsburys.co.uk/sainstrust/vetmed/social-responsibility/antibiotic-policy)

2. **NEW: Does the policy cover all your own brand products?**
Yes – “The following policy outlines our approach to responsible antimicrobial use across all livestock and aquaculture species. The core actions have been embedded in our raw material sourcing of all proteins through our livestock Codes of Practice and Select Farm Assurance documents.”

3. **NEW: Does the policy cover all branded products?**
Yes – M&S policy applies to all livestock and aquaculture. They don’t sell branded foods that contain animal protein.

4. **Does the policy ban suppliers from using antibiotics for routine prevention?**
Yes – “Ensure licensed antibiotics are always prescribed by a veterinarian for metaphylaxis or treatment of specific diseases, and cessation of routine prophylactic treatment”

5. **Does the policy restrict the use of the ‘high-priority critically important antibiotics’ (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity testing shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?**
Yes – “Our definition of critical antibiotics that must be restricted in our livestock and aquaculture supply chains, is an antibiotic that is defined as a ‘highest priority critically important antimicrobials’ by the European Medicines Authority (EMA). These categories include the 3rd and higher generation cephalosporins, fluoroquinolones and colistin.”
6. Does the policy ban the use of the last-resort antibiotic colistin?
Yes - “Because there are some important antibiotics that the government has identified as being critical to human health, our policy also prohibits farmers using these (e.g. fluoroquinolones, fourth and fifth generation cephalosporins and macrolides) and Colistin has also been removed in response to latest evidence.”

7. Do you monitor antibiotic use in your suppliers?
Yes - “Record: the use of antimicrobial agents per unit of livestock at the time of treatment, on all farms in the M&S supply, reliably and robustly... we will require our farmers to record and report more comprehensive usage data, reliably and accurately.”

8. Do you publish antibiotic-usage data?
Yes.

9. Do you publish antibiotic-usage data by farm system?
Yes/No – no specifics on farming system providing, other than for free range chicken, which shows zero use of antibiotics in 2020.

10. Do you have an antibiotic-use reduction strategy?
Yes – “Reducing antimicrobial use of livestock in the M&S supply... Through independent monitoring and review of the antibiotic usage in each livestock and aquaculture sector and engagement with our suppliers and associated veterinary advisors, we will seek to reduce unwarranted antimicrobial use.” Also “Our approach is not only about reducing antibiotic use but involves a framework of 4Rs:
Record – to understand the pattern of antibiotic use in supply chains
Replace – look for alternative treatments and husbandry approaches
Reduce – ensure that antibiotic use is part of a considered on-farm veterinary plan and only used when necessary
Refine – our approach to evolve our policies in light of new research, product development, etc.
Our aim is to reduce antibiotic use over time in a way that avoids detriment to animal welfare.”

11. NEW: Do you have antibiotic-use reduction targets?
Yes – “All our farmers must record antibiotic usage and we are committed to achieving annual reduction targets.”

12. NEW: Does the policy cover imported products, including ingredients?
Yes – “The following policy outlines our approach to responsible antimicrobial use across all livestock and aquaculture species. The core actions have been embedded in our raw material sourcing of all proteins through our livestock Codes of Practice and Select Farm Assurance documents.”

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1. Do you have a publicly available policy on farm antibiotic use?
Yes- Antibiotic Use
How we work – antibiotic use

2. NEW: Does the policy cover all your own brand products?
No- no evidence. However, their
two web pages relating to antibiotic use explain that some of the key criteria below do apply to different species and supply chains. For example, their own brand produce is produced from animals that are not routinely receiving antibiotics when they are not needed, and they have banned colistin from being used in their fresh meat and dairy supply chains.

3. NEW: Does the policy cover all branded products?
   No – no evidence.

4. Does the policy ban suppliers from using antibiotics for routine prevention?
   Yes – “Our own brand products are produced from animals that are not routinely receiving antibiotics when they are not needed.”

5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity testing shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?
   Yes – “No pork in our own-brand fresh supply chain is treated with any antibiotics critically important to human health. Farms which supply our other fresh meat, fish, dairy and eggs are required to only use critically important antibiotics (as defined by the European Medicines Alliance) as a last resort, if at all.”

6. Does the policy ban the use of the last-resort antibiotic colistin?
   Yes – “Colistin is prohibited in all our fresh meat and dairy products.”

7. Do you monitor antibiotic use in your suppliers?
   Yes – “we also monitor antibiotic use in all our fresh protein supply” and “asking all farms supplying Morrisons with meat, dairy and eggs to report their antibiotic use for anonymous benchmarking”

8. Do you publish antibiotic-usage data?
   Yes/No - “We note that there are still significant concerns from vets and industry bodies about the differing methodologies for data collection and how representative small sample sizes actually are, along with the complexities of direct and indirect supply chains involving parts of carcasses being sent to different supply chains. For that reason, we have chosen not to publish the antibiotic use figures reported to us in our supply chain in case this is benchmarked against other supply chains, which may double count some results.” They do however publish information about whether different species have met the RUMA usage targets.

9. Do you publish antibiotic-usage data by farm system?
   No - no evidence.

10. Do you have an antibiotic-use reduction strategy?
    Yes – “We will continue to share best practice through our farming groups, farming website and ‘Farming Matters’ magazine and will continue to work with vets, who are the gatekeepers of antibiotics on farm to maintain the momentum of reducing antibiotic use on farms and only using antibiotics when these are strictly necessary.”
11. NEW: Do you have antibiotic-use reduction targets?
Yes – “We support the RUMA targets for the industry and as antibiotic use is an issue that affects everyone, we work in partnership across the industry.” They report whether or not they have met the RUMA targets on their website.

12. NEW: Does the policy cover imported products, including ingredients?
No – no evidence.

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**Sainsbury’s**

1. Do you have a publicly available policy on farm antibiotic use?
   Yes –
   Animal Health & Welfare Report 2020
   Sainsbury’s Antibiotic Report 2021

2. NEW: Does the policy cover all your own brand products?
   Yes – The antibiotics policy is part of their animal welfare policy and this says “Our strategy of proactively and continuously improving health and welfare ensures we aim to do the right thing for both the animals in our care and for our customers. Our overarching animal health and welfare policies underpin this strategy and apply to all farmed species and countries in our own brand supply chains.”

3. NEW: Does the policy cover all branded products?
   No – no evidence.

4. Does the policy ban suppliers from using antibiotics for routine prevention?
   Yes – “As a general principle we do not permit the routine prophylactic use of antimicrobials. But we do recognise (as indicated in the RUMA guidelines) that controlled intervention may be required on a clinically-assessed risk basis to prevent the outbreak and spread of disease and to safeguard animal welfare.” And “they [antibiotics] cannot be used routinely to prevent disease.”

5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity testing shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?
   Yes – “We minimise the use of Critically Important Antimicrobials (CIAS) used in human health (as defined by the World Health Organization).” and “we have restricted the use of these critically important antibiotics over several years, to a point where most of our farms no longer need them.”

6. Does the policy ban the use of the last-resort antibiotic colistin?
   Yes/no – “Sainsbury’s eliminates Colistin use [in 2018] through farmer-led voluntary approach”. They have made a clear commitment to keeping use exceptional: “Colistin = an antibiotic often considered to be the most critically important of all CIAs. After extensive consultation with our veterinary team we have concluded it is best for animal welfare to permit Colistin use, but only in exceptional circumstances, where Colistin is the only suitable treatment. This is very important to ensure it is available to protect animal welfare in such
exceptional circumstances, and our data confirms minimal use in our supply chain, which highlights this voluntary approach is working.” Their published data for HPCIs shows colistin hasn’t been used in any of the UK supply chains at all between 2018 – 2020.

7. Do you monitor antibiotic use in your suppliers?
Yes - “Collaboration is key to our approach. We work closely with the farmers in our farmers’ groups and they share information with us, including data on antibiotic use. Such information enables us to make more informed decisions. Equipped with accurate data on the current level of antibiotics in our supply chain, we can move towards more responsible use”.

8. Do you publish antibiotic-usage data?
Yes/No – Sainsbury’s publishes progress against RUMA targets and % of own-brand fresh meat, salmon and shell egg supply chains, but not actual usage data. Sainsbury’s does however publish usage data for use of HPCIs.

9. Do you publish antibiotic-usage data by farm system?
No – no evidence.

10. Do you have an antibiotic-use reduction strategy?
Yes - “We work with our farmers’ groups to reduce antibiotic use, while protecting animal health and welfare.”

11. NEW: Do you have antibiotic-use reduction targets?
Yes – “Our overarching goal is to ensure antibiotic use within our supply chains is below the RUMA 2020 targets, and to continue to reduce use further where this is possible.”

12. NEW: Does the policy cover imported products, including ingredients?
Yes/no – “Our overarching animal health and welfare policies underpin this strategy and apply to all farmed species and countries in our own brand supply chains.” Imported ingredients and products which go into own-brand produce are included in the scope of this policy, but imported branded products aren’t

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1. Do you have a publicly available policy on farm antibiotic use?
Yes -
- Antibiotics
- Tesco Antibiotic Use Commitments – 2019/20 Report
- Animal welfare

2. NEW: Does your policy cover all your own brand products in your store?
Yes - This policy covers both our food & non-food (as a by-product of food production) products across the entire Tesco Group (including Booker in the UK and our businesses in the UK, Ireland and Central Europe) for all of our own-label products.

3. NEW: Does your policy cover all branded products in your store?
No – as above.

4. Does the policy ban suppliers from using antibiotics for routine prevention?
Yes - “We do not allow the routine use of antibiotics for prophylactic purposes in our supply chain.”
5. Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?
Yes - “We restrict the use of the highest priority “critically important” antibiotics for human health (fluoroquinolones, 3rd and 4th generation cephalosporin’s and colistin) as defined by the European Medicine Agency in our supply chain and make sure these antibiotics are used only as a treatment of last resort, where no other viable treatment is available to prevent animal welfare issues. We are working with our suppliers to reduce the use of other critically important antibiotics, including macrolides.”

6. Does the policy ban the use of the last-resort antibiotic colistin?
No – colistin is restricted but not banned, as above. They have however reported zero use of colistin in pigs, poultry and lamb in their most recent reporting covering 2019/20.

7. Do you monitor antibiotic use in your suppliers?
Yes - “We measure antibiotic use in our supply chain. We have made antibiotic usage and records a key feature of our farm audit programme. Visibility of records of any antibiotic usage at Tesco supplying farms is required to enable us to monitor levels of use and to help target reduction strategies.”

8. Do you publish antibiotic-usage data?
Yes - 2020 data is on their website, quite comprehensive across all species. See here.

9. Do you publish antibiotic-usage data by farming system?
No

10. Do you have an antibiotic-use reduction strategy?
Yes - “We will implement the UK species specific targets for antibiotic reduction (as defined by RUMA and the Veterinary Medicines Directorate) in our supply chain. From 2018, once we have sufficient data to establish a baseline, we will make sure that each of our animal sector supply chains have targeted reduction strategies in place to make sure they meet the specific national target for that species.

11. NEW: Do you have antibiotic-use reduction targets?
Yes – meeting national reduction targets as set by RUMA.

12. NEW: Does your policy cover imported products, including ingredients?
No – no evidence

**WAITROSE & PARTNERS**

1. Do you have a publicly available policy on farm antibiotic use?  
Yes - Our Animal Welfare Policy

2. NEW: Does the policy cover all your own brand products in your store?
Yes – “All our policy commitments, and all of our reporting, unless explicitly stated otherwise, apply to 100% of our own-brand supply chains (fresh, frozen, ingredient) irrespective of geographic location. These include all UK supply, New Zealand (NZ) lamb and venison and our authentic continental pig
meat sourced from Europe via our partner Winterbotham Darby.”

3. **NEW: Does the policy cover all branded products in your store?**
   No – however, they do say “Branded goods represent approximately 45% of Waitrose sales by volume. Our influence over the policies and performance of branded goods is more limited. We are however, actively exploring how best to work with branded suppliers to influence positive change for animal welfare in the wider industry. Where we can drive improvements in animal welfare for branded products, we do.”

4. **Does the policy ban suppliers from using antibiotics for routine prevention?**
   Yes- “Healthy animals are not routinely given antibiotics, they are only used for treating illness or for those with preexisting conditions”.

5. **Does the policy restrict the use of the “high-priority critically important antibiotics” (modern cephalosporins and fluoroquinolones) so that these antibiotics can only be used where sensitivity shows that other treatments would not be effective, and so that they are never used for prevention or for group treatments?**
   Yes - “CIAs are rarely prescribed and none of our supply chains use Colistin to treat livestock. All our own label supply chains are working towards significant year-on-year reductions in antibiotic use and have pledged to end using all CIAs as soon as possible. Our aquaculture supply chain achieved this pledge in 2020.”

6. **Does the policy ban the use of the last-resort antibiotic colistin?**
   Yes/No – “none of our supply chains use Colistin to treat livestock”

7. **Do you monitor antibiotic use in your suppliers?**
   Yes - Usage data is collected and published.

8. **Do you publish antibiotic-usage data?**
   Yes – usage data is collected and published in the body of their policy. Their current data goes up to 2020.

9. **Do you publish antibiotic-usage data by farming system?**
   No

10. **Do you have an antibiotic-use reduction strategy?**
    Yes – “All our own label supply chains are working towards significant year-on-year reductions in antibiotic use”

11. **NEW: Do you have antibiotic-use reduction targets?**
    Yes – “Since 2014, Waitrose & Partners, in conjunction with its suppliers, have developed strategies and policies to reduce the total use of antibiotics across its supply chains.” They also report against the RUMA targets.

12. **NEW: Does your policy cover imported products, including ingredients?**
    Yes/no - the policy covers own-label imports but not other imports.
### Reducing antibiotics in food production

#### Antibiotics use in our UK farms

The use of antibiotics varies depending on the livestock species and farming system used. We have continued the survey of farms supplying Asda. Where possible, we have included information on farming system and country of origin. This year’s data are presented alongside last year’s.

#### Beef Cattle

- **2017**: Asda survey five farms (suckler bred and dairy bred; mixed grazing and housing) averaged 7.4mg/kg pcu.<br>  National target: <20mg/kg by 2020.<br>  12 all-year-round housed farms averaged 9mg/kg.<br>  National target <10mg/kg by 2020.<br>  2018: Asda survey (28 million birds) averaged 7.3mg/kg pcu.

#### Dairy Cattle

- **2017**: Asda survey (30,000 cattle) averaged 20mg/kg pcu.<br>  National target <21mg/kg by 2020.<br>  2018: 2017 averaged 22.9 mg/kg pcu.<br>  47% reduction in High Priority Critically Important Antibiotics 2016-17.

#### Pork

- **2017**: Asda survey 10 farms (mixed hill and lowland with 4,500 ewes and producing over 7,000 lambs) was 3mg/kg pcu.<br>  National target is to monitor antibiotic aiming for a 10% reduction in the period 2016 to 2020.<br>  2018: Asda survey 10 farms, 10,000 lambs weaned. Flock ranging from 55 to 1,500 ewe. Average antibiotic use was 4.9mg/kg pcu.

#### Lamb

- **2017**: Asda survey 10 farms (mixed hill and lowland) with 4,500 ewes and producing over 7,000 lambs was 3mg/kg pcu.<br>  National target is to monitor antibiotic aiming for a 10% reduction in the period 2016 to 2020.<br>  2018: Asda survey 10 farms, 10,000 lambs weaned. Flock ranging from 55 to 1,500 ewe. Average antibiotic use was 4.9mg/kg pcu.

#### Chicken

- **2017**: Asda survey (28 million birds) averaged 7.7mg/kg pcu.<br>  National target: <20mg/kg by 2020.<br>  2018: Asda survey (28 million birds) averaged 7.3mg/kg pcu.

#### Turkey

- **2017**: Asda survey (4 million birds) averaged 20mg/kg pcu.<br>  National target: <50mg/kg by 2020.<br>  2018: Asda survey (4 million birds) averaged 20mg/kg pcu.

#### Duck

- **2017**: Asda survey (5 million birds) averaged 3.8mg/kg pcu.<br>  National target to maintain current low use (3.3mg/kg pcu in 2016. Source: British Poultry Council 2017).<br>  2018: Asda survey (5 million birds) averaged 2mg/kg pcu.

#### Eggs

- **2017**: Asda survey (1.5 million birds) Cage or Colony farms averaged 17.6mg/kg.<br>  Free Range farms averaged 8.4mg/kg pcu.<br>  2018: Cage on colony farms 8.2mg/kg pcu.<br>  Free range 21.3mg/kg pcu.<br>  National target is based on birds/days medicated (daily doses) is to be below 1%.<br>  Cage 2.7% (% days of medication with antibiotics)<br>  Free Range 7.0% (% days of medication with antibiotics)

#### Resistance and Responsibility

Lidl published data – Oct 2021:
https://www.google.com/url?q=https://corporate.lidl.co.uk/content/download/13121/fileupload/Lidl%2520GB%2520Antibiotics%2520Stewardship%2520Policy%25202019.pdf&sa=D&source=docs&ust=1634372478830000&usg=AOvVaw1j2BW4PVgF1LG3Cl6i9bC

Our targets
The targets table below refers to national targets set by The RUMA Targets Taskforce, which we fully endorse and adopt as part of our policy. More information can be found here.

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Dairy</td>
<td>&lt;21 mg/PCU</td>
<td>17mg/kg</td>
<td>Data currently unavailable</td>
<td>15% mg/kg fall in dairy herds by 2024; baseline 2020/21</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>25% mg/kg fall in calf rearing units by 2024; baseline 2020/21</td>
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<tr>
<td>Beef</td>
<td>&lt;10mg/kg</td>
<td>Overall use 19mg/kg</td>
<td>Data currently unavailable</td>
<td>Reduction in cattle injectables by 2024; baseline 0.26 mg/kg</td>
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<tr>
<td>Chicken</td>
<td>&lt;25 mg/kg</td>
<td>9.85mg/kg</td>
<td>Achieved (2017-2019 usage data)</td>
<td>Use remains &lt; 25mg/kg PCU in broiler production</td>
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<tr>
<td>Laying Hens</td>
<td>Maintain &lt;1% birds medicated /day and &lt;0.05% HP-CIA days medicated</td>
<td>Total birds/days treated remain below 1%</td>
<td>Achieved (2017-2019 usage data)</td>
<td>Maintain &lt;1% birds medicated /day and &lt;0.05% HP-CIA days medicated</td>
</tr>
<tr>
<td>Turkey</td>
<td>&lt;50mg/kg</td>
<td>45.18mg/kg</td>
<td>Achieved (2017-2019 usage data)</td>
<td>Use remains &lt; 50mg/kg PCU in broiler production</td>
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<td>Pigs</td>
<td>99 mg/kg</td>
<td>Overall use 131mg/kg</td>
<td>105 mg/kg No colistin use has been reported in 2020. (AHDB – e-Med hub)</td>
<td>30% reduction in total use by 2024, baseline 2020</td>
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<tr>
<td>Sheep</td>
<td>Reduce overall use by 10%</td>
<td>Data collection efforts ongoing</td>
<td>Data currently unavailable</td>
<td>Annual reduction of 10% in oral doses/year; baseline 7.45 million</td>
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<tr>
<td></td>
<td></td>
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<td></td>
<td>Ensure HP-CIA’s does not rise in sheep above 0.05% of total sheep use</td>
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<tr>
<td>Salmon</td>
<td>&lt;5 mg/kg</td>
<td>Data collection efforts ongoing</td>
<td>Data currently unavailable</td>
<td>Maximum 5 mg/kg annually</td>
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<tr>
<td>Trout</td>
<td>&lt;20 mg/kg</td>
<td>Data collection efforts ongoing</td>
<td>Achieved (2017-2019 usage data)</td>
<td>Maintain usage below 20 mg/kg</td>
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M&S data – Oct 2021:

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<thead>
<tr>
<th>Species</th>
<th>2019 Antimicrobial usage (mg/PCU)</th>
<th>2020 Antimicrobial usage (mg/PCU)</th>
<th>RUMA Target by 2020 (mg/PCU)</th>
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<tbody>
<tr>
<td>Chicken</td>
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<tr>
<td>Oakham</td>
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<td>13.43</td>
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<td>Ingredient (UK and EU)</td>
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<td>Dairy</td>
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<td>8.7**</td>
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<td>Egg (% days treated)</td>
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<tr>
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<td>0.00</td>
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</table>

*This was breeder to finisher. Reporting has changed to slaughter pigs only.

**For dairy, antimicrobial usage has decreased (amount and courses). The population corrected unit is 425kg which inflates the usage levels for dairy cattle which are 700kg on average.
Sainsbury’s – Oct 2021:
Tesco – Oct 2021:

Poultry
The year-on-year trends for broiler chickens, turkey and duck are illustrated below (Figures 1, 2 and 3).

Figure 1. Antibiotic Use (mg/kg) across Tesco Broiler Supply Chains (all) vs reported VARSS Data

Figure 2. Antibiotic Use (mg/kg) across Tesco Turkey Supply Chain (threat) vs reported VARSS Data

Figure 3. Antibiotic Use (mg/kg) across Tesco Duck Supply (all) vs reported VARSS Data

Eggs
The egg data set is reported in terms of total treatment days per hundred birds (reflecting relative frequency of required therapeutic intervention – Figure 4).

Figure 4. Total Treatments per 100 Bird Days in Egg Supply Base

Pigs
Reporting across the pig sector is differentiated in terms of conventional supply (from UK and Denmark) and Continental Meats (Spain and Italy).

Figure 5. Antibiotic Use (mg/kg) in Pork Supply Base (all) vs reported VARSS Data

Lamb
An annual reporting figure is available from our Tesco Sustainable Lamb Group for the first time that details use across flocks and antibiotic usage by percentage of therapeutic class (Figure 6).

Figure 6. Antibiotic Use (mg/kg) in Tesco Continental Pork Supply (all) vs ESVAC Data

Dairy
The data from the Tesco Sustainable Dairy Group (TSDG) demonstrates year-on-year reduction across all key parameters and with no immediate indication of having reached a plateau (Figure 7).

Crucially, the percentage of cases treated with HPCIA therapeutics has decreased and similarly, the proportion of total treatment occasions necessitating HPCIA use has decreased. Perhaps as importantly, from an animal welfare perspective the reduction in Dry Cow Therapy (DCT) and mastitis treatment is indicative of management approaches which are reflective of a pre-active (preventative) rather than re-active (treatment) strategy.

Figure 7. Mean Antibiotic Use % Total Treatment Days for Dairy Cows
- Geese mortality increased year on year due to fox predation.
- Goat kid mortality increased year on year due to a bacterial challenge on one farm, resolved by use of a different building for rearing kids.
- Laying hens slight increase in mortality due to bird life length increases.
- Halibut increase in mortality due to better data reporting.
- Salmon mortality increased but still within the range of data variance. There are examples of sites realising low % mortalities so want to explore the drivers of that to aspire for a broader improvement.

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### Animal Welfare at Waitrose & Partners – July 2021:

References


16. DANMAP 2020, Use of antimicrobial agents and occurrence of antimicrobial resistance in bacteria from food animals, food and humans in Denmark, https://www.danmap.org/reports/2020


