Antibiotics Policy Toolkit

Guidance for Contract Catering companies on how to achieve a responsible antibiotic policy across your supply chain.

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1. What is antibiotic resistance?

Antibiotics are medicines used in human and veterinary medicine to treat and prevent infections caused by bacteria. Antibiotic resistance occurs when bacteria evolve in response to the overuse of these medicines, which then lose their power to treat and prevent infections.

According to the World Health Organization (WHO), antibiotic resistance is one of the biggest threats to global health, food security, and development. A recent study published by The Lancet estimated that 4.95 million deaths associated with an antibiotic-resistant infection in 2019 and that for 1.27 million of these people their deaths were caused by the antibiotic resistance of the infection.

2. The importance of a responsible antibiotics policy

Increasing antibiotic resistance is caused by the overuse of antibiotics in both human and veterinary medicine. While most antibiotic resistance in humans is caused by human antibiotic use, leading authorities such as the European Medicines Agency and the WHO say that the overuse of antibiotics in farming contributes to higher levels of antibiotic resistance in some important human infections.

Bacteria on or in livestock develop resistance to antibiotics when these medicines are overused. These resistant bacteria can then transmit to humans through the food chain, when raw meat is handled, or when undercooked meat is eaten. Resistant bacteria, and sometimes antibiotic residues, can also spread through the environment when manure is spread on land and end up in water or on vegetables.

Worldwide it is estimated that 66% of all antibiotics are used in farm animals, not people. Much of this use is routine, and enables farm animals to be kept in poor conditions where disease spreads easily. In the UK, routine farm antibiotic use has been significantly reduced, although it is still permitted, and about 30% of antibiotics are used in animals.

3. The risks of *not* achieving a responsible antibiotics policy

Regulation

Antibiotic resistance is an urgent public-health threat that poses a systemic risk across industries. Regulators are increasingly restricting the use of antimicrobials in the protein supply chain. In the UK, antibiotics can be added to animal feed or drinking water to help prevent or control diseases. Individual treatments of sick animals also occurs. The use of antibiotics to promote faster animal growth has been banned in the UK and the EU since 2006 but continues to be permitted in some non-European countries.

In January 2022, the EU became the first region to ban all forms of routine antibiotic use, including preventative (also called “prophylactic”) group treatments. Campaign groups, including the Alliance to Save Our Antibiotics, are calling on the UK Government to introduce similar policies in the UK. The government has announced that the UK veterinary medicines regulations are being revised and will be updated, and new restrictions on farm antibiotic use may be introduced.

In addition, the UK Government Buying Standards for Food and Catering Services are expected to come up for consultation in 2022. It is anticipated that tighter guidelines around animal welfare and antibiotics will be considered.

These developments mean that continuing to rely on using antibiotics as a means of increasing efficiency and preventing disease caused by inadequate husbandry is not going to be sustainable. Increasingly businesses will need to source their animal protein from farms using good husbandry and avoiding reliance on routine antibiotic use.

Consumers and media

There is growing consumer awareness and civil society focus on the overuse of antibiotics in food animals. The Alliance to Save Our Antibiotics' work on supermarket antibiotic policies has demonstrated that consumers and the British media really care about responsible antibiotics use in food supply chains.

The Alliance to Save Our Antibiotics have published three evaluations of supermarket antibiotic policies between 2017 and 2021, which have achieved widespread coverage in the Daily Mail, the Guardian and on the BBC.

These evaluations have shown that significant progress has already been achieved in this sector. Our 2021 supermarket research found that all 10 of the UK's leading supermarkets included a ban on most, or all, of their UK own-brand suppliers from using antibiotics for routine disease prevention in their antibiotic policy. In 2019, only six supermarkets had such a ban. The Alliance to Save Our Antibiotics will continue to campaign for further changes to supermarket policies, whilst turning our attention to also look at the antibiotic policies of contract caterers.

Shareholders

The FAIRR[1] Initiative helps investors integrate risks and opportunities into their investment decision-making. One of their key areas of focus for 2022/2023 is the overuse and misuse of antimicrobials in the food sector. According to FAIRR, the problem of antibiotic resistance is at a critical point. The estimated cost in terms of lost global production could reach $100 trillion by 2050 if action is not taken. This matters to investors.

As a result, shareholders are pushing companies throughout the animal protein supply chain to put in place policies to limit the use of antibiotics to lessen their exposure to such regulatory and reputational risks and help to reduce the growing risk of antibiotic resistance.

This is already having an impact. When FAIRR began engaging with 20 of the largest restaurant companies such as McDonald's and Yum! brands in 2016, only one company had a policy on antibiotic use. By 2019 - because of the ongoing work from FAIRR, Business Benchmark on Farm Animal Welfare (BBFAW), and other engagement initiatives - nineteen companies had antibiotic use policies and one was in the process of developing a policy (this is for at least one species and geography).

[1] Established by the Jeremy Coller Foundation, the FAIRR Initiative is a collaborative investor network that raises awareness of the environmental, social and governance (ESG) risks and opportunities brought about by intensive livestock production.

4. What does a responsible antibiotics policy for a catering supply chain look like?

A complete antibiotics policy checklist for contract caterers, from basic to advanced:

i) The policy content

Basic	There is no routine preventative use of antibiotics permitted in the supply chain.	
Basic	Antibiotics use in the supply chain is monitored.	
Basic	There is an antibiotic-use reduction strategy in place. Such a policy should include a focus on good animal husbandry and welfare aimed at reducing disease incidence and the need for antibiotics.	
Intermediate	The use of the 'highest-priority critically important antibiotics' (modern cephalosporins, fluoroquinolones) is restricted across the supply chain, so that these antibiotics can only be used where sensitivity testing shows that other treatments would not be effective. Highest-priority critically important antibiotics (HPCIAs) should never be used for prevention or for group treatments.	
Intermediate	There is a complete ban on the use of the antibiotic colistin - which is used as a last-resort antibiotic in human medicine - in the supply chain.	
Advanced	Antibiotic-use reduction targets are set (these should be at least as ambitious as targets set by the industry group RUMA)	

ii) The policy coverage:

Basic	The antibiotics policy covers all UK-produced freshly cooked/prepared meat, fish, dairy, and eggs served in cafes and restaurants	
Intermediate	The policy covers all UK-produced food, including branded and pre-packaged items	
Advanced	The policy covers all food sold/served in your outlets, including all imported produce	

iii) Publishing and transparency:

Basic	The antibiotics policy is published online, publicly available, and visible on your website	

Basic	The policy is clear about the coverage (i.e., does it cover fresh, frozen, pre-packaged, ingredients, UK produced, imported produce, all species?).	
Intermediate	Antibiotic-usage data in the supply chain is published at regular intervals e.g., annually	
Advanced	Antibiotic-usage data is published by farming system (e.g., intensive, free-range, organic, pasture-fed)	

5. Getting started – hints and tips:

- Set out antibiotics policies and animal-welfare policies by species, and make these documents publicly available, so suppliers know what is required and customers know what to expect.
- Set a contractual requirement for your suppliers to meet your antibiotics policy and ask them to work towards submitting regular antibiotic-usage data.
- Various farm assurance schemes (e.g., Red Tractor, Organic, RSPCA assured) have standards on antibiotic use which in some cases are above legal minimums, see Section 8 below. Consider how sourcing produce from some of these assurance schemes may help you meet some or all of the requirements of responsible antibiotic use in your supply chain.
- The European Union, as well as Norway and Iceland, now have laws in place which prohibit all forms of routine farm antibiotic use, including preventative group treatments. Non-European countries nearly always have lower legal standards on antibiotic use, sometimes even permitting the use of antibiotics for growth promotion. When importing animal produce, consider the legal standards on farm antibiotic use of the country you are importing from and how easy it will be to obtain data on the antibiotic use of your overseas suppliers.
- Allot a member of staff or team to lead on antibiotics policy development and roll-out, perhaps supported by a wider working group. Choose those with pre-existing skill sets in animal welfare policy, sustainability, and corporate social responsibility
- Have regular scheduled check-ins with the working group to make sure policy planning development and onboarding remains on track.
- Change happens more quickly when there is oversite right from the top. Consider assigning a member of the executive committee to oversee the delivery of your antibiotics policy and ask that they feedback regularly on progress.

6. Other sources of help and guidance:

- Reach out to those with experience already working in the area who will be able to provide advice, support, and resources:
  - The Alliance to Save Our Antibiotics
  - The Compassion in World Farming Food Business team has published a how-to guide for corporates to create an antibiotics stewardship programme that includes a supplier check list to send to suppliers
- We would encourage all contract caterers to join The Food Industry Initiative on Antimicrobials (FIIA). The FIIA brings together retailers, manufacturers, processors, and food service companies to promote and support responsible antibiotic use in livestock farming and aquaculture – taking collective action on antimicrobial resistance (AMR). You can find the FIIA Antibiotics policy online.

7. Glossary of terms:

Antibiotics	Antibiotics are medicines used to treat or prevent infections caused by bacteria.
Antibiotic resistance	Antibiotic resistance happens when bacteria develop the ability to survive and reproduce in the presence of antibiotics which previously killed or prevented them from growing. The overuse of antibiotics makes resistant bacteria more common.
Colistin	Colistin is used as a last-resort antibiotic in human medicine for treating life-threatening infections when all other antibiotics have been rendered ineffective due to antibiotic resistance. The Alliance to Save Our Antibiotics and many scientists believe that colistin should be reserved for use in human medicine and no longer used in farming.
Highest-Priority Critically Important Antibiotics (HPCIAs)	HPCIAs are antibiotics used in food animals that are the most important to human medicine. According to a World Health Organization classification, these are modern cephalosporins, fluoroquinolones and colistin.
Preventative/Prophylaxis	Antibiotic treatment given to an animal or a group of animals to prevent disease. Prophylactic use and preventative use are the same thing.
Routine antibiotic use	Where antibiotics are given regularly to animals, at specific periods of their life, in order to maintain acceptable health in environments that are stressful and cause disease. Routine antibiotic use can be avoided by improving animal husbandry, keeping animals in less stressful conditions, improving hygiene, and using alternative treatments which can include vaccination.

8. Accreditation and assurance schemes – what do they mean for antibiotics?

In this section we have outlined what each accreditation scheme means for antibiotic use. Some farm accreditation or assurance schemes have specific rules on antibiotic use, or on antibiotic data collection, which go beyond minimum legal standards. Antibiotic rules for the organic sector remain the strictest, although improved antibiotic-use data collection is still needed.

Organic farming

Rules on antibiotic use in organic livestock farming are strict. A recent Alliance to Save Our Antibiotics study found that antibiotic use in Soil Association certified organic farmers was about four times lower than the national average. This is partly because of the stricter rules on antibiotic use, but also because of higher minimum animal-welfare standards which help avoid animals falling sick.

In the UK, different bodies such as the Soil Association or Organic Farmers and Growers certify organic farmers. All certifiers must meet minimum organic rules although some certifiers have further higher rules.

Rules which apply to **all organic farmers:**

- No preventative antibiotic use is permitted, except for individual animals undergoing surgery.
- Plant-based medicines, homeopathic medicines, trace elements, vitamins and minerals should be used in preference to antibiotics. If, however, these alternative treatments are inappropriate or ineffective, allopathic medicines or antibiotics must be used.
- Animals cannot be sold as organic if they receive more than three courses of antibiotics in 12 months, or more than one course if their lifecycle is less than one year.
- The organic withdrawal period for all antibiotic medication is double the statutory withdrawal period. During the withdrawal period, animals cannot be slaughtered for human consumption and milk and eggs cannot be collected for human consumption.

In addition to these organic rules, **Soil Association** licensees must abide by the following additional rules:

- No use of the last-resort antibiotic colistin is permitted.
- High Priority Critically Important Antibiotics can only be used as a last resort.

Pasture for Life

The following Pasture for Life antibiotic standards apply to all species:

- Prophylactic or sub-therapeutic use of antibiotics is prohibited.
- When antibiotic treatment is required for individual animals, third- and fourth-generation cephalosporin antibiotics must not be used unless the farm's vet states that they are the only suitable option.
- Pasture for Life require written health plans that focus on the prevention of illness or injury - as well as specifying that when animal does get sick or injured it must be treated immediately

RSPCA Assured

The RSPCA accreditation scheme for farms does not allow the routine use of antibiotics. It also recommends only using HPCIAs as a last resort, however this recommendation is not part of their standards for any species.

Further antibiotic standards apply for certain species. For cattle (beef and dairy), sheep and chickens; antibiotic use must be reviewed annually. For cattle and sheep, an action plan must be implemented for reducing antibiotic use through improvements in animal husbandry. For pigs, use of the industry e-Medicines book is recommended.

Red Tractor

Antibiotic usage rules for Red Tractor differ by species. Antibiotic use rules that apply for all species (beef, dairy, lamb, pigs, chickens, turkeys, and ducks) include:

- Antibiotic use data must be collated annually.
- HPCIAs can only be used as a last resort.

For **poultry** (chickens, turkeys and ducks) the following additional rules apply:

- No preventative use of antibiotics.
- No use of the last-resort antibiotic colistin or of the third and fourth generation cephalosporin antibiotics.

For **pigs**:

- Collated antibiotic-usage data must be uploaded onto the industry e-Medicines book
- Collated usage data must be reviewed annually with a vet.
- Persistent high users must develop and implement an antibiotic-use reduction plan with their vet.

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