ANTIBIOTIC USAGE POLICY IN M&S SOURCED LIVESTOCK AND AQUACULTURE

At M&S, our ongoing commitment is to source our raw materials for meat, poultry, dairy, wild and farmed fish products, from the most sustainable sources possible.

Through our Agriculture, Aquaculture and Fisheries Programme, we are working with farmers and suppliers to ensure the welfare of the animals and staff is safeguarded and the impact on the environment is minimised, as well as ensuring efficient and safe food production.

As part of this programme, we are actively addressing the use of antibiotic medicines in all our livestock and aquaculture supply chains. Due to increasing concerns regarding the emergence of antimicrobial resistant bacteria affecting human health, and the links to the use of medicines in livestock, we fully support the need to safeguard our antimicrobial medicines[1] and reduce the threat of antibiotic resistance to global human health. We also recognise the importance of responsible veterinary care and the role that antimicrobial use plays in protecting the health and welfare of the animals in our supply.

Our policy for antibiotic usage in M&S sourced livestock has been developed in consultation with our sustainability advisors, veterinary staff and suppliers. The European Medicines Authority (EMA)[2] have classified antibiotics in terms of their importance to human and animal health. Our definition of 'critical antibiotics' that must be restricted in our livestock and aquaculture supply chains, is an antibiotic that is defined as a 'Category B - Restrict' by the European Medicines Authority (EMA)[3]. These categories include the 3rd and higher generation cephalosporins, quinolones and colistin, which are also listed as 'highest priority critically important antimicrobials' by the World Health Organisation (WHO). In line with the EMA and the WHO, we believe these medicines should be particularly safeguarded for use in people.

The following policy outlines our approach to responsible antimicrobial use across all livestock and aquaculture species in our supply chains[4]. 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, which set the standards that all our Select Farm suppliers must adhere to, and our Select Farm Outcome Measures, which provide independently collected data on the welfare and sustainability of animals in our supply chains.

[1] Antimicrobial medicines are substances that kill or inhibit the growth of micro-organisms (including bacteria, parasites, viruses and fungi). However, in line with OIE and EFSA, we are limiting the term to describe antibacterial agents used for the treatment of bacterial infections. We therefore use the terms 'antimicrobials' and 'antibacterials' interchangeably, unless clearly explained otherwise.
[2] https://www.ema.europa.eu/en/documents/report/categorisation-antibiotics-european-union-answer-request-european-commission-updating-scientific_en.pdf
[3] https://www.ema.europa.eu/en/documents/report/infographic-categorisation-antibiotics-use-animals-prudent-responsible-use_en.pdf
[4] This policy covers all M&S' own-brand products and ingredients, M&S do not sell any branded products that contain animal protein. This policy also covers products and ingredients sourced from the UK, as well as those that are imported.

Our Approach – the 4Rs Framework

1. **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;

2. **Reduce:** the annual usage of antimicrobial agents in our supply chains, by prohibiting unnecessary and routine prophylactic use and restricting 'critical antibiotic' use, whilst ensuring animal health and welfare is preserved;

3. **Replace:** the use of antimicrobial agents where possible with evidence-based and sustainable solutions to prevent disease, which are identified and selected for the farm context using an Animal Health and Welfare Plan devised on an annual basis in collaboration with a veterinary surgeon;

4. **Refine:** the use of antimicrobial agents, by ensuring the responsible and informed selection and correct administration of products to animals that require treatment or non-routine metaphylaxis.

Further details on how we are implementing this approach across our supply is provided below.

1. Recording antimicrobial use for livestock in the M&S supply

All our farmers already record antimicrobial use for all animals through documentation in a manual or electronic medicine book. However, to allow us to better understand antimicrobial usage within our supply chains and support monitoring initiatives at a wider national level, we require our farmers to record and report the following comprehensive data on all animals/groups of animals sourced for M&S, reliably and accurately, for each treatment administered:

1. The name of the antibiotic active ingredient used for each treatment;
2. The total quantity of antibiotic used (mg) for each treatment; and
3. The number and life stage category of animals produced.

To monitor antibiotic usage over time, for each of our species supply chains, we will use the following measures:

Total antibiotic usage = Total milligrams (mg) of active antibiotic used / number of Population Correction Units (PCU)[5]

'Critical antibiotic' usage = Total milligrams (mg) of active 'critical antibiotic' used / number of Population Correction Units (PCU)

For some species, other units of measurement will also be used. For example:

Total percentage of flocks receiving antimicrobial courses, for chickens (critical and non-critical courses defined)

Percentage of bird days medicated, for laying hens (critical and non-critical treatments defined).

The number of antibiotic treatment courses is included alongside total quantity used for some species, to discourage behaviours such as not completing a course, under-dosing, or using a higher potency

[5] Population Correction Unit (PCU) is a technical unit of measurement representing the estimated weight of livestock when they are most likely to receive antibiotic treatment. 1 PCU = 1kg of bodyweight of the animal at the time of treatment. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/580710/1101060-v1-Understanding_the_PCU_-_gov_uk_guidance.pdf

(often critical) antibiotic to reduce the dose rate, as this could lead to an even greater risk of antimicrobial resistance developing.

Antibiotic use and trends are monitored on an ongoing basis at individual farm and supply chain levels for a selection of key livestock and aquaculture species, alongside animal welfare outcome measure data. This allows us to showcase best practice in our supply, as well as promptly investigate regressive trends and generate solutions alongside our suppliers. It also helps us and our suppliers to monitor the impacts of antibiotic use reductions, ensuring that these are not accompanied by animal welfare problems. A data-centred approach underpins our commitment to ensuring that antibiotic use does not compensate for inadequate husbandry and management practices.

As national and international policies evolve, we will revise our policy to report antimicrobial use in line with standardised approaches and the leading veterinary authorities on medicine usage. Reports including antibiotic usage for a selection of our key livestock and aquaculture supply chains can be found in our animal welfare performance data, which are published annually on our corporate website. For chicken, which is sourced to various standards[6], antibiotic use is provided for the different production systems (e.g. antibiotic use is provided separately for free range, ingredient and Oakham Gold). We are actively working on the collection of antibiotic use data for *all* of our livestock and aquaculture supply chains, and in the meantime, our Select Farm Assessments verify compliance with this policy for all species. To align with industry, M&S antibiotic use targets reflect the RUMA Targets Task Force targets, published and refreshed annually, and M&S is also a member of FIIA, which brings together stakeholders from the food industry to take collective action on antimicrobial resistance.

2. 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.

Our current actions to reduce antibiotic usage that apply to all livestock and aquaculture species include:

a. Restricting the use of 3rd and higher generation cephalosporins and quinolones (antibiotics in EMA Category B – Restrict), to treatments of last resort and when supported by diagnostic testing and a written veterinary recommendation to protect animal welfare. These antibiotics must never be used for disease prevention including group preventative treatments, and their use must be notified to M&S via the supplying processor. We also *prohibit* the use of EMA Category B antibiotic colistin in all our supply chains, and we are working with our suppliers to cease use of all other critical antibiotics.
b. Ensure licensed antibiotics are always prescribed by a veterinarian, and *only* for non-routine metaphylaxis[7] or treatment of specific diseases. Routine prophylactic[8] treatments are prohibited in our supply, helping us to ensure that antibiotics are not masking poor hygiene or husbandry.

[6] Although chicken is sourced to various standards, M&S sources most other species to a single specification alongside an organic offer; e.g., all eggs are free range or organic, and all fresh and ingredient pork is outdoor bred or organic.
[7] Metaphylaxis is the treatment of a group of animals in exceptional circumstance in which one or more of the animals, or previously 'in-contact' animals, are showing clinical signs of a disease and have received a veterinary diagnosis. Metaphylaxis must always be accompanied by additional actions to reduce the spread of infection from the diagnosed individuals to the rest of the herd or flock when at all possible; for example, isolation of diagnosed individuals in a hospital pen.
[8] Prophylaxis is the treatment of a healthy animal or group of animals, to prevent infection before an expected disease challenge.

3. Replacing antimicrobial use for livestock in the M&S supply

We require all our producers to implement a Herd Health and Welfare Plan that is developed in conjunction with a veterinary surgeon and reviewed and updated on at least an annual basis[9]. The plan must cover key disease and welfare challenges specific to the farm, a review of existing antimicrobial use data, and opportunities to replace usage with alternative management, breed and infrastructure solutions.

At the supplier level, in each livestock sector we will support leading initiatives to tackle the key disease challenges with practical and evidence-based solutions that can replace the need for medicine use, including vaccinations, improved management strategies, genetics, nutrition, biosecurity and novel technologies.

4. Refining antimicrobial use for livestock in the M&S supply

We are working with our suppliers and veterinary associates to ensure that when animals do require treatment or non-routine metaphylaxis, the correct drug and dosing regime is correctly applied. We encourage the use of diagnostic testing, when recommended by veterinary surgeons, to ensure that the most effective antibiotic is selected to target the infection and optimise the treatment outcome.

[9] Laying hen farms are permitted to review their health and welfare plans every flock cycle, rather than annually, to fit within production cycle periods.