



Mitchells & Butlers plc

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Sent by E-mail to: aarti.ramachandran@fairr.org

10 September 2018

Dear Ms Ramachandran,

Thank you for your letter of the 15th August 2018 to our CEO Mr Phil Urban and for your positive comments on our work in this area. Please see below our response to the points raised in your letter.

Antibiotics Policy

The M&B antibiotics policy currently covers all livestock and states that the routine prophylactic use of antibiotics is prohibited.

Later this month we will be issuing a questionnaire to the supply base to confirm the current status of antibiotic use across all fish and seafood purchased. This will enable us to fully analyse the category and work with our suppliers to determine and implement optimal welfare standards for fish and seafood across all our brands.

This sector operates under three global governance regimes, i.e. for farmed fish the Aquaculture Stewardship Council and Global GAP and for wild-fish the Marine Stewardship Council. We will continue our dialogue with all three and would welcome and encourage FAIRR's engagement with these bodies to help drive the measurement and reduction of antibiotic usage at source in this sector.

Targets and Timelines

As you know animal welfare is an issue that M&B take very seriously and so our focus is on the removal of prophylactic use of antibiotics. Setting targets is an area that we are reluctant to move to at the moment, as rather than focus on a number we believe that animals should receive appropriate antibiotics when therapeutically required and as recommended by vets.

Our experience in this area shows that where there is a fragmented supply chain, e.g. cattle, it is difficult to accurately track the use of antibiotics when compared to a more vertically integrated



sector such as poultry. We would welcome FAIRR's thoughts on the conversations they are having with the sector leaders including the NFU, Bord Bia and AHDB.

Increase transparency and reporting of implementation

Across our poultry and pork supply chain M&B have adopted the industry standard on measuring antibiotic usage (mg per PCU) and we will be adopting this measure for red meat. In 2018 we published antibiotic outcomes on our website and plan to continue this practice and expand the categories covered.

With regards to the evaluation framework on antibiotics, the M&B position is as follows:

- Does the company have an antibiotics policy publicly available on its website?
 - Yes
- What is the scope of the policy?
 - M&B's policy covers all livestock production and is being progressed to cover farmed fish and seafood
- Strength of commitment
 - The M&B policy prohibits the prophylactic use of antibiotics and recognises that the classes of antibiotics deemed by WHO to be most critically important to human health should only be used therapeutically and where it is the sole option to prevent a severe welfare crisis, as assessed and administered by a veterinary surgeon.
 - M&B are working with suppliers to understand where antibiotics are being used as part of a programme to find an alternative approach, e.g. probiotics.
- Targets and Timelines
 - The M&B approach is to focus on therapeutic care for each animal rather than work to a numeric target
- Auditing and Monitoring
 - The M&B report and website requires back-up documentation that is reviewed and checked by our auditors – this is also the case for our key suppliers
- Reporting on progress inc levels of antibiotic use
 - Yes – currently poultry and pigs with further species to follow.

Thank you once again for your interest in M&B.

Yours Sincerely



David Gallacher
Director of Food Trading

CC: Phil Urban, Chris Hopkins, Greg McMahon, Keith Edwards, Lorraine Provest-Eames, Darryl Thomson and Sally Ellson.