

# Food Industry Initiative on **ANTIMICROBIALS**

## **FIIA Code of Conduct on Access to and Use of Industry Antibiotic Data**

This code of conduct outlines the expectations of FIIA of its members in relation to the access, availability and sharing of data between and from those in the agri-food industry, covering all commercial livestock and farmed fish. This code applies equally to all members irrespective of size or sector.

### **1. FIIA members will recognise the sensitivity of individual farm-level data.**

- a. All farm-level antibiotic data remains the property of the provider, whether farmer/business owner or veterinary surgeon/practice.
- b. FIIA members will comply with UK GDPR<sup>1</sup> wherever applicable.
- c. FIIA members will commit to the overarching principles of:
  - i. A pre-competitive approach to industry and supply chain antibiotic use data that constructively drives industry change towards a more responsible use of antibiotics.
  - ii. Providing or facilitating the provision of, where possible, appropriate data on antibiotic use to aid the population of each sector's centralised data collation hub.
  - iii. Robust and trusted measures in place between processors, vets and farmers to ensure that inappropriate or excessive use of antibiotics is identified by those party to farm-level data, and addressed supportively.

### **2. FIIA members will commit to specific data handling protocols.**

- a. There are sector-specific variances on the quantity and quality of available data relating to on farm use of antibiotics; however, industry initiatives and supply chain requirements are driving better data and better availability of this data.
- b. The data owner should have explicit understanding of how their data will be shared with customers/next-level in the supply chain, and in what format.
- c. De-identification of farm-level data beyond the processor or next-level in the supply chain should be ensured through either anonymisation<sup>2</sup> or aggregation, unless otherwise agreed through specific consent from the data owner.

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<sup>1</sup> The UK GDPR is the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (EU GDPR) as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by Schedule 1 to the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 (SI 2019/419).

<sup>2</sup> Anonymisation means the data cannot be related back to a farm business via an identifier, for example the CPH number.

- d. Frequency of reporting can be determined by individual agreement between individual customer and processor but must be respectful of the recording and reporting frequency of that species.
- e. FIIA members should be able to evidence that UK GDPR has been followed and appropriate consents obtained if identifiable farm-level data provided to them by suppliers is shared onwards.
- f. Data should be provided in an agreed consistent format to allow aggregated (species-specific) supply chain totals can be calculated (see [RUMA guidelines on appropriate measurement units](#)).
- g. An aggregated supply chain total (by species) will be provided to any retailer, manufacturer or food service business by the supplying processor upon request.
- h. An anonymised representation of farm level antibiotic data can be requested by retailers or food service to show the range of antibiotic levels within their supply to demonstrate that responsible use is being achieved across the business.
- i. An agreed approach should be in place within each supply chain to substantiate appropriately presented constituent data if required.
- j. Any caveats or limitations of the data should be outlined clearly.

**3. Where data is published or shared publicly, FIIA members will commit to accuracy and transparency.**

- a. The ease with which antibiotic data can be captured and reported varies significantly between supply chains depending on the species, level of industry integration and the amount of direct versus indirect supply and carcass balance; these differences are inherent and should not be exploited competitively.
- b. The primary aim of data capture remains the ability to support responsible use and change within supply chains.
- c. While available data may be released with the best of intentions, there is danger in third parties contrasting data that cannot be compared due to differences in representativeness and methodologies. Therefore, FIIA members who wish to publish or release antibiotic data from their supply chains should ensure:
  - i. The representativeness/coverage of data is stated as actual or estimated (eg, <x%) percentage of the supply chain represented.
  - ii. The methodologies used to calculate the data are clear, including units of antibiotic measurement and basis for biomass calculations.
  - iii. Terms such as 'responsible use' or 'prudent use' are only used where there is evidence that best practice has been adhered to throughout.
  - iv. Sufficient evidence is available on request to support any claims made.
- d. Where data availability or representativeness is currently low due to the nature of the supply chain, FIIA members should avoid publishing data to avoid risk of misinterpretation. As an alternative they may wish to state the percentage of their supply chain for which they capture antibiotic data in each sector, and (if available) the percentage of their data which meets RUMA targets.
- e. FIIA will work towards establishing a robust set of criteria which any future data should meet before being considered for publication to minimise the risk of misuse or misrepresentation by third parties, or misunderstanding by the public.