



NATIONAL BRANDS LIMITED

17 February 2023

Animal Law Reform South Africa

For Attention: [REDACTED]

[REDACTED]

[REDACTED]

RE: CORPORATE ACCOUNTABILITY PROJECT – REQUEST FOR ACCESS TO INFORMATION

We refer to your letter dated 31 January 2023 together with your request for access to records of National Brands Limited for the purpose of your corporate accountability project relating to chicken welfare practices of key role players in the poultry sector.

We have reviewed your information requests and our responses are set out below in red (for ease of reference). It is worth noting that National Brands Limited does not play any role in the poultry sector other than as a purchaser of egg pulp and spray-dried egg albumen powder.

Your request for access to information:

1. **Annual and Sustainability Reports** produced during the period:

Please see the AVI Limited annual reports, including the sustainable development reports, at <https://www.avi.co.za/investor/results-and-presentations/annual-reports/>.

2. **Legal Compliance: Any and all enforcement and compliance records** issued during the period, including:

None in respect of either 2.1 or 2.2 below.

- 2.1. Reports, licenses, permits, warnings, citations, notices, directives, and similar enforcement and compliance records, both internal and external) specifically in relation to compliance and/or on-compliance with animal, environmental, and agricultural legislation (including any amendments, rules, lists, notices, regulations, etc. in terms thereof). This legislation includes, but is not limited to:

[REDACTED]

- 2.1.1. Regulations Regarding the Grading, Packing and Marking of Eggs Intended for Sale in the Republic of South Africa of 31 May 2019, Notice 289 of 2019;
 - 2.1.2. The Animals Protection Act 71 of 1962 (“**APA**”), including any warnings/citations, and/or infringements issued in respect of any employees, contractors or personnel in performing their duties;
 - 2.1.3. The Meat Safety Act 40 of 2000;
 - 2.1.4. The Animal Identification Act 6 of 2002;
 - 2.1.5. The Veterinary and Para-Veterinary Professions Act 19 of 1982;
 - 2.1.6. The Animal Diseases Act No.35 of 1984;
 - 2.1.7. The National Environmental Management Act 107 of 1998 (“**NEMA**”);
 - 2.1.8. The National Environmental Management: Waste Act 59 of 2008 (“**NEMWA**”);
 - 2.1.9. The National Environmental Management: Air Quality Act 39 of 2004 (“**NEMAQA**”);
 - 2.1.10. The National Water Act 36 of 1998, (the “**legislation**”).
 - 2.2. Any information recording or containing details of inspections by the South African Police Service (“**SAPS**”), National Council of Societies on the Prevention of Cruelty to Animals (“**NSPCA**”) and any Societies for the Prevention of Cruelty to Animals (“**SPCA**”), and any other relevant authority of animal welfare.
3. **Charges laid, and judgments and orders handed down**, including in any and all criminal and civil proceedings in which you were cited as a party relating to the aforementioned legislation:
- None.**
4. **Internal Policies relating to Animal Welfare and Environmental matters** applied or produced during the period:
- Please see the AVI Limited annual reports, including the sustainable development reports, at <https://www.avi.co.za/investor/results-and-presentations/annual-reports/>. National Brands Limited’s internal procurement team vet all suppliers.**
5. **Egg production and Supply Chain details –**
- National Brands Limited does not have access to this information. National Brands Limited purchases egg pulp and spray-dried egg albumen powder from Sunspray Food Ingredients (Pty) Ltd (<https://sunspray.co.za/>). Sunspray are members of the South African Poultry Association. They also have a certificate for a Veterinary Approved Establishment and are audited by the state veterinarians once a year.**
- We are not in a position to provide you with information pertaining to Sunspray’s procurement and production processes, as these are confidential to them. You may contact them directly in regard thereto.**
- 5.1. Records relating to the number of chickens housed/processed per annum of each of your suppliers;
 - 5.2. Records relating to the number of eggs produced per annum of each of your suppliers;

- 5.3. Records relating to nutrition of chickens of each of your suppliers;
- 5.4. Records relating to the use of cages and type of cages used by each of your suppliers;
- 5.5. Records relating to the stocking density of each of your suppliers;
- 5.6. Records relating to the number of chickens and chicks culled in the production process by each of your suppliers.

6. **Asset Register and Stock:** Any and all records relating to your assets and stocks that may be relevant based on the aforementioned explanation of the Project:

National Brands Limited has no assets or stock directly deployed in chicken welfare practices of key role players in the poultry sector. As stated above, National Brands Limited purchases egg pulp and spray-dried egg albumen powder from Sunspray, who in turn acquire eggs from their poultry farmers.

7. **Membership** records relating to any and all membership (present and past) relating to the egg, chicken and poultry industry. This includes correspondence or documentation confirming, refusing, suspending, terminating, or otherwise relating to any membership of any of the following (as applicable):

National Brands Limited is not a member of any of these industry bodies and is not required to be a member for purposes of the poultry sector.

- 7.1. The South African Poultry Association (“**SAPA**”);
- 7.2. SAPA Egg Association;
- 7.3. SAPA Broiler Association;
- 7.4. Livestock Welfare Co-ordinating Committee (“**LWCC**”);
- 7.5. South African Bureau of Standards (“**SABS**”);
- 7.6. Sustainable Retailer Forum;
- 7.7. Animal Feed Manufacturer Association;
- 7.8. Any other poultry, egg or chicken organizations or associations that may be relevant based on the aforementioned description of the Project, (the “**Associations**”, as applicable).

8. **Compliance with Association standards and requirements and Certification:**

National Brands Limited is not required to comply with any standards of these Associations relating to the poultry sector.

- 8.1. Any and all records of compliance and/or non-compliance with third party standards and/or requirements, correspondence as applicable and certifications with/by the Associations and other third party standards and/or requirements that may be relevant based on the aforementioned explanation of the Project.

9. **Third Party Certification:** Certificates/notices, letters and correspondence illustrating any third-party certifications. This would include:

National Brands Limited does not have any of these certifications and is not required to have same in respect of the poultry sector.

- 9.1. Certificates/notices issued illustrating certification by A Greener World (“**AGW**”); and
- 9.2. Other third-party certifications that may be relevant based on the aforementioned explanation of the Project.

10. **Commitments:** Records indicating any and all animal welfare-related commitments and progress towards these commitments This would include:

National Brands Limited is not party to any of these commitments.

- 10.1. Better Chicken Commitments (“**BCC**”);
- 10.2. Cage-Free Commitments;
- 10.3. Other commitments that may be relevant based on the aforementioned explanation of the Project.

11. **Public Statements:** Any and all public statements relating to animal welfare regarding eggs, sourcing thereof or chickens under your control:

National Brands Limited has not made any public statements regarding the sourcing of egg pulp or spray-dried egg albumen powder.

