

## **Response from a third party to the CMA's invitation to comment on remedies**

The divestment of ABF's Northern Ireland (**NI**) bakery business does not effectively address the CMA's concerns around a substantial lessening of competition (**SLC**) with the supply of bread and bakery products in NI. In that, the owner of the bakery business will almost certainly continue to be beholden to ABF, given that ABF will continue to operate one of the two flour mills in NI, which will be a key supplier to the business. In other words, there is a composition risk with the proposed remedy package; namely the purchaser would not be sufficiently independent of ABF and this in turn would likely impede the purchaser from operating as an effective competitor in NI. Accordingly, to address this in respect of the SLC, the CMA remedy should extend to either (i) the sale of ABF flour mill in NI as part of the sale of NI bakeries, or (ii) requiring the ABF flour mill to be sold to a third party independent of the bakery business.

**22 April 2026**