

**ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS**

**64th Meeting of ACAF on 9 May 2014**

Information Paper

Meeting Summary of the VMD Antibiotic Resistance Engagement Forums

**Veterinary Medicines Directorate  
April 2014**

## Meeting Summary of the VMD Antibiotic Resistance Engagement Forums

### Introduction

1. Between November and December 2013 the Veterinary Medicines Directorate (VMD) hosted engagement forums for five different animal sectors; ruminant, pig, poultry, companion animals and fish. Each group was composed of invited members who represented a broad spectrum of interest and influence within their sector, including; specialist veterinary surgeons, farmers, academics, retailers, industry bodies, trade associations and third sector bodies.
2. The objective of each forum was to encourage productive discussion around the topic of antibiotic resistance - focusing not just on the problem of resistance, but on what activities could be undertaken to address related issues. The aim was to facilitate the exchange of expertise and perspectives between participants, in particular the forums presented an opportunity for participants to:
  - provide advice and feedback on the development and impact of government activities around antibiotic resistance;
  - exchange and circulate antibiotic resistance related information between government and animal keepers/stakeholders;
  - update government of industry, veterinary and husbandry practices or initiatives within the sectors that might impact on the development of antibiotic resistance;
  - help raise awareness of the current antibiotic resistance issues within the sectors.
3. The forums took place under the Chatham House rule which states that “*participants are free to use the information received, but neither the identity nor the affiliation of the speaker(s), nor that of any other participant, may be revealed*”.
4. This document is a high level summary of the discussions that took place and covers the common themes and comments that were raised across the forums. All comments and responses contained in this summary were captured during the sessions and reflect the ideas and views expressed by the group participants, and are not necessarily those of the Veterinary Medicines Directorate.

## Cascade Legislation

### Background:

5. The EU Veterinary Medicinal Products Directive, the legislation that sets out the controls which apply to the prescription and administration of veterinary medicines, including antibiotics, is expected to undergo revision in 2014. Although it is still unknown what new measures may be introduced in the directive there is speculation that it may include additional restrictions on use of antibiotics, including Cascade.
6. The Cascade is a risk based decision-tree to help veterinary surgeons decide which product to use when there is no authorised veterinary medicine available. Without the Cascade, veterinary surgeons would only be allowed to prescribe veterinary medicines that are authorised for a given species and for a given condition. The Cascade is based on the principle that, if there is no veterinary medicine authorised in the UK for treating a disease, the veterinary surgeon responsible for the animal may, in particular to avoid unacceptable suffering, treat the animal with a product that is unauthorised.

### Response from the forums:

7. There was much concern that any further restriction on application of the Cascade, especially in food producing species, would have a serious impact on the health and welfare of animals. There were calls for greater clinical freedom on prescribing under the Cascade, however it was also suggested that if stricter controls were placed on some specific elements of the Cascade e.g. dosage regimens, this could be beneficial.
8. At present the Cascade legislation is not perceived to assist in promotion of responsible use of veterinary medicines containing a Critically Important Antibiotic (CIA<sup>1</sup>). There are clinical conditions for which the only authorised product available is a CIA. Under current legislative requirements an authorised product must be employed over prescription of an unauthorised product; even if an effective product that does not contain a CIA is available under the cascade.

## Availability of medicines

---

<sup>1</sup> As defined by the World Health Organisation.

**Background:**

9. The availability of medicines is a constant consideration for vets; this is particularly true regarding antibiotics. There are very few new antibiotics in the development pipeline and older antibiotics appear to be being withdrawn from the market. There is also speculation that within the revision of the EU Veterinary Medicinal Products Directive there will be further restrictions on what antibiotics can be used and when, especially those classified as Critically Important Antibiotics (CIAs).

**Response from the forums:**

10. Any revision on the availability of antibiotics should be proportionate, based on evidence, and take into account the differences between different animal production sectors. If there was a blanket ban on all CIAs; cephalosporins, fluoroquinolones and macrolides – this would have significant impact on many sectors and lead to sick animals being ineffectively treated, which would be directly at odds with welfare requirements.
11. There is a need to promote and keep on the market medicines containing older antibiotics such as penicillin, tetracycline and oxytetracycline – they still work and in comparison to newer antibiotics are cost effective. It was asked whether the VMD could do more to liaise with pharmaceutical companies to try and get older products back onto the market.
12. Antibiotics are prescription only medicines and can only be prescribed by a vet who has seen the animal. However there was concern that antibiotics are becoming too readily available without prescription from illegal internet sites. The perception is that they are mainly targeting companion animal owners and smaller niche areas of animal keeping e.g. pigeons and koi carp.

**Data Collection****Background:**

13. In the recently published cross-governmental Antimicrobial Resistance (AMR) Strategy one of the key areas for action is to improve data collection. This applies to both antibiotic consumption data and bacterial sensitivity surveillance data. Currently the VMD collects and publishes figures on UK sales volumes of antibiotics authorised for use in animals. These reports are based on sales data provided voluntarily by the veterinary pharmaceutical

companies. In addition the VMD delivers a programme of surveillance of resistance in veterinary derived zoonotic, commensal and pathogenic bacteria, the results of which are also published. As part of the AMR Strategy the VMD is looking to develop how data is currently collected, and considering other methods, models and sources of collecting data e.g. collecting prescription data from vets.

#### Response from the forums:

14. It was acknowledged there are many limitations to the current collection of sales data carried out by the VMD. Sales data do not accurately reflect the amount of antibiotics used as sales figures in general over-estimate use, since not all of the antibiotics sold will be used. There is also natural wastage resulting from pack-sizes that do not meet dose need, and drug expiry. There was frustration that until more accurate data are collected it is not possible to gain a precise idea of what is being used and for what purpose. Until the data improve it will be very difficult to benchmark use or identify what the main drivers for use are.
15. There were concerns that an increase in antibiotic sales figures against a particular species compared to previous years within the sales data published by VMD can reflect negatively upon certain sectors. There can often be justifiable reasons behind such variations, e.g. the use of a product authorised for poultry in horses under the cascade legislation, or a disease breakout in a large population of animals. It is not possible to reflect this in the published data.
16. Within various sectors e.g. poultry, pig and fish, data are being collected on antibiotic usage by industry bodies or vets. Although there is openness to sharing these data, there is also some concern that this should be approached carefully to ensure data protection requirements are observed, and to avoid any data being mishandled or used to mislead, which could damage a particular sector.
17. It was felt that the information published in the VMD bacterial sensitivity surveillance report needs to be made clearer for veterinary surgeons and for industry, e.g. by using 'non-expert' terminology to make it easier to understand.

## Awareness and behaviour change

### Background:

18. Another key area for action in the recently published cross-governmental Antimicrobial Resistance (AMR) Strategy is to improve education, training and public engagement around antibiotic resistance. Much work has already been done at a UK and EU level by Government and other animal sector bodies to raise awareness; this includes engagement in the European Antibiotic Awareness day, production of guidance for vets and farmers and poster campaigns for pet owners and the general public.

Response from the forums:

19. It was felt that in all facets of the animal health sector; vets, farmers, animal keepers, pet owners, there were clear divisions. This seemed to fall within three categories; those that are educated about antibiotic resistance and want to engage with associated initiatives, those that are aware of antibiotic resistance but are not wanting to be proactive about it, and those that are unaware of antibiotic resistance and don't engage with any education or awareness initiatives.
20. There is no one solution to engaging with these three categories, but the fear was that all current efforts to educate and raise awareness through publicity campaigns, Continued Professional Development etc., are simply 'preaching to the converted' and not reaching those that need to modify their behaviour. Other methods of outreach and education should be explored; initiatives such as peer to peer learning to help educate farmers in reducing antibiotic use through good husbandry; and engaging with the retail industry, who have influence over the farmers within their assurance schemes, to promote responsible use messages.
21. It was also emphasised that one of the key messages that must be pushed out is the importance of good husbandry and bio-security. Simple measures towards better husbandry and bio-security can drastically decrease the outbreak of disease on a farm and therefore the reliance on antibiotics. Bio-security must also not just be seen as restricted to farms as it is just as important in companion animal practices.
22. Regardless of any initiatives, or methods of outreach, it was generally perceived that the only effective way to bring about change with the 'unreachables' would be through legislative action rather than education.

## **Finances and funding**

Background:

23. The current economic climate is having an impact on farmers. It is also having an effect within Government meaning there are fewer resources available for policy initiatives to support the farming sector or to fund future Research and Development projects to look in to antibiotic resistance.

Response from the forums:

24. Many farmers are living with the conflict between financial pressure and reducing the need for antibiotics. They know that herd health can be improved through such things as building upgrades, but are not able to afford it and therefore more reliant on antibiotics to deal with disease outbreaks. This is not helped by the increasing lack of funds and grants available from the Government.
25. There was speculation as to how much finances are affecting prescribing habits - are farmers asking their vets for older antibiotics as they are cheaper? Are vets reliant on antibiotics as a source of income, and if so does this effect which antibiotic they would prescribe?

Veterinary Medicines Directorate

April 2014