ANTIMICROBIAL USE IN VETERINARY MEDICINE – PAPER FOR THE EUROPEAN COMMISSION

A CONSIDERATION BY THE UK’S RESPONSIBLE USE OF MEDICINES IN AGRICULTURE ALLIANCE (RUMA)

Introduction

1. RUMA is a UK alliance of 20 farm to fork organisations who wish to encourage farm animal medicines to be used responsibly. The alliance was established in 1998 and provides guidance to veterinary surgeons and farmers on the responsible use of medicines, especially antimicrobials.

2. RUMA welcomes the Commission’s aims for the current review of the Veterinary Medicines Directive 2001/82 and Medicated Feedingstuffs Directive 90/167/EEC and especially to deliver a regulatory system that can address appropriately the antimicrobial resistance (AMR) challenge. RUMA also welcomes the Commission’s willingness to receive advice and comments from those working in the field as evidenced by the far reaching consultation and the experts’ meeting on antimicrobial resistance held in Brussels on 8 June 2012. At that meeting RUMA understands that the Commission invited further comment and is pleased to provide this paper.

Background

3. RUMA is pleased to note that all of the key documents issued by the Commission, Council and European Parliament on antimicrobial resistance in recent months call for antimicrobials to be used responsibly in both humans and animals. These documents recognise that AMR is a global threat to the continued effectiveness of antimicrobials and that antimicrobial resistance does not respect geographical or species boundaries. AMR is clearly a one health issue that needs to be tackled collaboratively by all interested groups. In particular, RUMA announced its strong support for the Commission’s action plan against the rising threat of AMR in a press release issued on 29 November 2011 (see Annex 1).

Medicine use in animals

4. Like people, animals get sick. Those responsible for the animal will be faced with several choices and actions, the first of which is to make sure that the animal’s needs are fully catered for so providing a safe, quiet and clean environment with adequate food and water. The decision to treat the animal with an appropriate available treatment or euthanase it will depend on the severity of the illness, any legal controls relating to the diagnosis and the value of the animal. This is, of course, different to human medicine where people must be treated using the different treatment options open to medical doctors. Furthermore, culling rather than treating animals represents an economic loss to the farmer, increased costs to the consumer and a greater environmental impact by the food production sector.

5. In order to maintain animal health and welfare most farm animals that fall ill will be treated with an authorised veterinary medicine on the advice of a veterinary surgeon who must prescribe the appropriate medicine. This is important as safe food comes from healthy animals.
Antimicrobial use in animals

6. Commissioner Dalli said in a speech to the French Parliament in July 2011 that "antimicrobial medicines remain essential in the treatment of sick animals affected by bacterial infections". RUMA fully supports this comment. The current range of antimicrobials authorised for use in animals provides a key element in the veterinary surgeon’s ability to treat disease. RUMA believes that this range of antimicrobials, including those considered to be critically important to humans, should remain available for veterinary use. Like all medicines, antimicrobials should be used responsibly which means:

- farms should be managed so that the risk of disease developing is minimised. Good husbandry practices such as good hygiene, well ventilated sheds, access to clean water, good bio-security controls and good farm health planning, including appropriate vaccination strategies, will all help to reduce the disease challenge.
- when animals become ill they should be treated in accordance with instructions from the farm’s veterinary surgeon and following any specific protocols as appropriate to the farm’s health planning regime.
- antimicrobials should be used only as prescribed by the farm’s veterinary surgeon and the full course of treatment should be given.
- critically important antimicrobials should not be used preventively or as first line treatment unless there is clear scientific justification to do so.
- use according to the label and use under the cascade only by exception.

All medicines on farm should be used as little as possible and as much as necessary. This means using medicines only when required and then using them appropriately. Reducing dosages or the length of treatment simply to use less antimicrobials to meet arbitrary reduction targets is not responsible use. It could encourage the development of antimicrobial resistance and compromise animal health and welfare.

Responsible use guidelines

7. RUMA guidelines provide clear information to veterinary surgeons on how to prescribe antimicrobials and other medicines responsibly. The guidelines also provide information to farmers on responsible use following a prescription of an antimicrobial by their vet. Each guideline has a longer, more technical, version for vets and a shorter version for farmers. They are species specific and are prepared by experts in the UK and regularly reviewed to keep them up to date with best practice. They apply to the use of medicines in all farming systems. All the guidelines are available free of charge from the RUMA website (www.ruma.org.uk) and their use is promoted by RUMA officers and members, in particular, at farmer and veterinary meetings.

Legislative changes

8. The Commission’s discussion paper presented to the experts’ meeting on 8 June 2012 raised a number of key issues that may or may not be addressed by changes to Directives 2001/82 and 90/167. These changes need to strike the correct balance between controlling the risk of AMR in animals affecting the treatment of humans and providing the
necessary medicines to enable high levels of animal health and welfare to be maintained. In order to achieve this RUMA believes that:

- decisions should be based on the scientific evidence available and be proportionate in order to control the actual risks identified. RUMA acknowledges that antimicrobial resistance can transfer from animals to humans and vice versa and this can lead to treatment problems. But the current evidence is that the vast majority of human antimicrobial resistance stems from the use of antimicrobials in humans.
- any controls on the authorisation of antimicrobials in animals should be proportionate and based on scientific evidence. Care must be taken to ensure that companies are not discouraged from developing new antimicrobials for veterinary use.
- the same requirements should apply to all products whether generic or originator.
- the use of antimicrobials to prevent disease developing or spreading in groups of animals should continue to be permitted.
- critically important antimicrobials (CIAs) for human use should be clearly defined and these definitions should apply across all Member States (MS). Limitations on the use of CIAs in animals e.g. as first line treatments or under the cascade, should be supported by scientific evidence and clearly shown on product labels and Summary of Product Characteristics (SPC).
- antimicrobials should only be prescribed by veterinary surgeons who should be allowed to supply them as this helps maintain a viable rural veterinary practice network, which is essential for notifiable disease surveillance and control and for ensuring that farm animal welfare is maintained.
- more training, especially Continuing Professional Development (CPD), should be available to vets to help them use antimicrobials responsibly and to keep up to date with developments on AMR.
- MS should be encouraged and helped to produce responsible use guidelines relevant to their national farming practices. With 14 years experience RUMA would be happy to assist with this. Indeed RUMA provided the model for the European Platform for the Responsible use of Medicines in Animals (EPRUMA) which is ideally placed to facilitate this.

RUMA
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RUMA (the Responsible Use of Medicines in Agriculture Alliance) welcomes and strongly supports the European Commission Action Plan against the rising threat of Antimicrobial Resistance (AMR).

The European Commission has recommended a holistic approach to the rising threat of antimicrobial resistance development in its Communication to the European Parliament and the Council, published on 17 November 2011. This approach is highlighted in the Plan’s aims to

1. mitigate the development of AMR through appropriate use of antimicrobials and promoting microbial diagnosis,
2. prevent microbial infections,
3. develop effective antimicrobials,
4. work with international partners and
5. use research and innovation to combat AMR.

In line with RUMA’s work, the Commission has emphasised the importance of responsible use of antimicrobials by all. The Commission will introduce recommendations for prudent use in veterinary medicine (Action 3) and RUMA would very much like to assist the Commission in this work.

RUMA has already developed species specific sets of detailed guidelines on good practice for antimicrobial use in animals (see www.ruma.org.uk) which promote
health in all its aspects. Bio-security, good housing, good nutrition and health plans, coupled with appropriate vaccine use are all part of the Responsible Use approach and are recognised in the Commission’s plan. The RUMA guidelines are available in complementary versions for farmers and, in a more technical form, for veterinary surgeons and contain detailed guidance to help farmers and vets use antimicrobials responsibly.

RUMA welcomes the Commission’s proposals to strengthen and harmonise surveillance systems on AMR and antimicrobial consumption in both the human and animal sectors across the EU. AMR is a complex issue and some groups continue to use this to call for a reduction in the antimicrobials available for animal use. RUMA believes that any changes in animal or human use should be driven by sound science and such change should be evolutionary not revolutionary. Harmonised surveillance is vital so that the same things are measured in the same way to allow valid comparisons between human and animal use to be made.

RUMA also welcomes the Commission’s emphasis of the need for education campaigns throughout the EU. RUMA encourages the Commission to extend their laudable initiative to provide funds for training and education on responsible use of antimicrobials for professionals in the field of human medicines to those involved in veterinary sector.

NOTES FOR EDITORS

1. For further information contact RUMA Secretary General John FitzGerald (rumasec@btinternet.com) or see the RUMA website www.ruma.org.uk