Submission of comments on 'Answer to the request from the European Commission for updating the scientific advice on the impact on public health and animal health of the use of antibiotics in animals - Categorisation of antimicrobials'

Comments from:

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<td>British Veterinary Association</td>
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Please note that comments will be sent to the ICH M10 EWG for consideration in the context of Step 3 of the ICH process.
### Who we are

The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With 18,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom’s veterinary profession. We, therefore, take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

### Introduction

Antimicrobials are essential to both veterinary and human medicine to treat infectious and zoonotic bacterial diseases. Continued availability of all existing antimicrobial classes and the development of new ones for veterinary use are essential to maintain the health and welfare of companion, equine and food animals and for the protection of public health.

Each use of antimicrobials increases the risk of selection for resistant bacteria, so we must ensure the use of antimicrobials is responsible across human and animal health. The UK veterinary community is concerned by the implications of the development of antimicrobial resistance.

According to a survey of the UK veterinary profession undertaken by BVA, nearly all (97%) vets are concerned about antimicrobial resistance, with nearly half (46%) describing themselves as very concerned.

The timespan of the UK Five Year Antimicrobial Resistance Strategy 2013-2018, has seen considerable success, reflected in October 2017 by the publication of the Veterinary Antimicrobial Resistance and Sales Surveillance (VARSS) 2016 report which marked several important milestones:¹

- The commitment to reduce antibiotic use in livestock and fish farmed for food to a multi-species average of 50 mg/kg by 2018 was achieved two years early. Antibiotic use in food-producing animal species decreased by 27% to 45 mg/kg.

The lowest UK veterinary antibiotic total sales figure recorded (337 tonnes) since regular UK antibiotic sales reporting began in 1993.

Reductions across sales of all highest-priority critically important antibiotics (HP-CIAs), including an 83% reduction in sales of colistin use for food producing animals, from an already very low level.

The VARSS 2017 report demonstrated further progress. Total sales of veterinary antibiotics, adjusted for animal populations, was 37 mg/kg in 2017. This result signals an additional 18% reduction from 2016 and a 40% reduction since the publication of the UK AMR strategy in 2013. Sales of HP-CIAs dropped a further 29% from levels in 2016, to 0.8% of total sales in 2017.

This improvement at a UK level, coincided with a Europe wide improvement. According to the latest ESVAC report, published in October 2018, sales of antibiotics for use in animals across Europe fell by 20% between 2011 and 2016.

Advice of the Antimicrobial Advice Ad Hoc Expert Group

BVA welcomes the action taken by the Antimicrobial Advice Ad Hoc Expert Group (AMEG) to provide updated advice on the classification of antimicrobials used in animals. We particularly welcome that this categorisation brings together human health, animal health and welfare and public health considerations, which we believe is a worthwhile and useful process. This supports a ‘One-Health’ approach, which spans people, animals, agriculture and the wider environment.

We note the scope of this categorisation, as outlined within the consultation document, is not intended to directly translate into a treatment guideline for use of antimicrobials in veterinary medicine. It is instead intended to be utilised as “one element” within a wider consideration when deciding on whether to use a certain class/substance in veterinary medicine.

We agree with this approach, because as the document notes there are several factors that may differ between regions (the variety of animal species, the different routes of administration, types of production systems, the presence of different diseases, and occurrence of antimicrobial resistance). As such, treatment guidelines need to be developed and implemented at the appropriate local level.

We appreciate that this update seeks to take into account the experience gained since the initial publication of the

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Categorisation of antimicrobials in 2014. We also welcome an effort to refine the criteria used to determine the categorisation of antimicrobials. The inclusion of two additional criteria (route of administration and indications for veterinary use and availability of alternative antimicrobials of lesser risk) are welcome.

We would appreciate further detail of how these new criteria were taken into account. Route of administration is particularly relevant within the companion animal sector where veterinary surgeons will often apply topical treatment for conditions such as ear disease. Further, we would note that there are limits to how effectively these criteria can be applied within more minor use species where there are fewer alternative antimicrobials available.

**Communications**

BVA believes that this categorisation can act as a useful foundation for developing treatment guidelines. It can also act as a useful tool to raise awareness and facilitate behaviour change amongst veterinary surgeons and animal keepers.

The presentation of the categorisation appears cogent. Classifying antimicrobials within four categories is helpful for treatment choice. Clarity has been provided by aligning the hierarchy to place category A as the most restricted class. However, we would note the labels attached to the categories may be confusing as the meaning of each label is not clearly distinct and may be open to misinterpretation.

Further consideration should be given to how this categorisation and associated communications will best influence behaviour. In particular we would note that it is important for an intervention to be Easy, Attractive, Social and Timely (EAST). These principles for applying behavioural insights are based on the work of the Behavioural Insights Team and a large body of evidence on what influences behaviour.

We would advise that several organisations categorise antimicrobials (e.g. WHO, OIE) and there are cases where the EMA ranking will diverge. We would note that there will likely be some confusion caused by the variety of different categories, and communications strategy should consider this to ensure this potential confusion does not become a barrier that could potentially limit the use of this categorisation as a tool by those preparing guidelines.

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4 Behavioural Insights Team, EAST Four simple ways to apply behavioural, 2014 <https://www.behaviouralinsights.co.uk/publications/east-four-simple-ways-to-apply-behaviouralinsights/>