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The UK farming industry's response to the European Commission's public consultation on antimicrobial resistance.

This paper, although written and presented by the NFU (England and Wales) has been developed in consultation and co-operation with members of the Responsible Use of Medicines in Agriculture (RUMA) Alliance and the English Cattle & Sheep Health and Welfare Groups. This response will answer consultation questions from the perspective of the use of antimicrobials in animals only.

RUMA is a unique initiative in the UK involving organisations representing every stage of the "farm to fork" process, and aims to promote a co-ordinated and integrated approach to best practice in the use of medicines. The objectives and efforts of RUMA are recognised by members of the Veterinary Medicines Directorate, the Food Standards Agency and Defra. There is also close contact between RUMA and EPRUMA, its European counterpart based in Brussels.

RUMA membership is open to all organisations with an interest in the areas of food safety, animal health and animal welfare. Its current membership includes:

Agricultural Industries Confederation (AIC)	EBLEX
Animal Health Distributors Association (AHDA)	Linking Environment And Farming (LEAF)
Animal Medicines Training Regulatory Authority (AMTRA)	National Beef Association (NBA)
Assured Farm Standards (AFS)	National Farmers' Union (NFU)
BPEX	National Office of Animal Health (NOAH)
British Poultry Council (BPC)	National Pig Association (NPA)
British Retail Consortium (BRC)	National Sheep Association (NSA)
British Veterinary Association (BVA)	Royal Association of British Dairy Farmers (RABDF)
City & Guilds NPTC	Royal Pharmaceutical Society of Great Britain (RPSGB)
DairyCo	Royal Society for the Prevention of Cruelty to Animals (RSPCA)
Dairy UK	

The **Cattle and Sheep Health and Welfare Groups** are two industry led groups tasked with taking responsibility for prioritising, planning and coordinating programmes of economically focussed improvements to cattle and sheep health and welfare in England.

UK farmers, their associated partners and allied industries, which includes the veterinary profession, (from here on, the collective will be referred to as the **UK farming industry** for the purpose of this report), have recognised the threat of antimicrobial resistance (AMR) to the health and welfare of humans and animals for over a decade and through partnership efforts have worked hard during this time to adopt and disseminate best practice principles on the use of antimicrobials. Whilst we are by no means in a position where we can relax or become complacent, the UK farming industry feels that it is in a stronger position than some of its EU counterparts to protect and retain the availability of antimicrobials for the benefit of humans and our animals.

In formulating the UK's response to the Commission paper, the following 'reflection points' have been noted and considered:

- The adoption of strategy and action plans, and establishment of intersectorial coordinating mechanisms in all Member States
- Ways to strengthen the surveillance system and improve access to information for policy makers, professionals and members of the public
- Monitor the impact of any national measures
- Ways to improve the education of healthcare professionals
- Ways to inform and involve the general public
- Enhancing the exchange of best practice
- Ways to strengthen the network of stakeholders involved in the prudent use of antimicrobials

The UK farming industry recognises that human health must be the overriding consideration guiding antimicrobial use. Our combined industry efforts are therefore tailored to encourage responsible use of antimicrobials in farm animals in order to reduce any possibility of loss of efficacy in human treatment. That said the recognised status of all animals as sentient beings within Europe places a responsibility on animal keepers to protect the health and welfare rights of any animals in their care. This includes the provision of veterinary treatment and medicines when appropriate. A good guiding principle is that 'veterinary medicines should be used as little as possible but as much as necessary'. This is a sentiment that the UK farming industry has embraced.

The use of animal medicines carries with it responsibilities. Under UK legislation, all antimicrobials are licensed for specific species and uses and a product will not be authorised unless very stringent requirements are met.

The use of therapeutic antimicrobials is under the direct responsibility of veterinary surgeons. Farmers, however, have a very considerable role to play in ensuring that the directions of the veterinary surgeon are properly carried out and also in developing and applying disease control measures which minimise the need for antimicrobial use. Therapeutic antimicrobial products should be regarded as a complement to good management and farm hygiene, not a replacement.

There is a joint responsibility between the veterinary surgeon and the farmer to ensure that antimicrobials are used correctly and for the right reason. Ultimately though, it is the farmer who is responsible for ensuring that animal medicines are used in a safe, responsible and effective way on the farm.

RUMA have produced a range of guidelines which can be downloaded for free from the RUMA website¹. These guidelines have been developed to provide education and best practice advice to farmers on where their responsibilities lie and how they can ensure that they execute those responsibilities properly. The following lines are extracted from the RUMA guidelines for beef and sheep production as examples of some of the advice and recommendations given:

- *Treatment should be initiated with a medicine that is subject to veterinary prescription only with formal veterinary approval. Accurate information, including other medicines being administered, should be given to the veterinary surgeon to allow correct diagnosis and appropriate medication and dosage. Clear instructions must be left on the farm and made available to all staff responsible.*
- *The full course of treatment at the correct dosage should always be administered.*

¹ RUMA guidelines on the responsible use of Antimicrobials in farmed animals can be downloaded from the RUMA website at <http://www.ruma.org.uk/antimicrobials.htm>, free of charge.

- *Withdrawal periods must be strictly adhered to in order to protect the consumer. Information on the required withdrawal period can be found on the medicine labels.*
- *An animal medicines record book together with copies of relevant regulations and Codes of Practice must be kept on the farm.*
- *Animal keepers should accurately record the identity of the treated animals, the batch number, amount and expiry date of the medicine used, plus the required withdrawal period and the time and date the medication was completed for any specific animal. Appropriate information should be kept on file of medicines used (e.g. product data sheets, package inserts or safety data sheets). Records must be kept for a period of five years after the treatment has ended even if the animal has been slaughtered.*
- *Medicines must be stored according to the manufacturers' instructions. Unused or unwanted medicines must be disposed of according to manufacturers' instructions or returned to the veterinary surgeon or supplier for safe disposal.*
- *Any suspected adverse reactions in either the animals undergoing treatment or the staff treating them, should be reported to the Veterinary Medicines Directorate (VMD). Adverse reaction forms can be found on the VMD's website at www.vmd.gov.uk. A report can be submitted by the farmer or the attending veterinary surgeon. Keep a note in the medicines book or a copy of the VMD's adverse reaction report if available.*
- *Cooperate with Farm Assurance Schemes that monitor medication and withdrawal compliance. However, such schemes should not constrain the farmer from preventing the suffering of animals.*
- *Work with the veterinary surgeon in monitoring the potency of antimicrobial use.*

Complementary actions amongst the veterinary profession and network of Specially Qualified Persons (SQPs) to disseminate best practice have also occurred recently using the principles of RUMA guidance. The British Veterinary Association (BVA), for example, has recently launched an initiative aimed at veterinary practices and farmers on how to avoid antimicrobial resistance. It is a poster based initiative² but has complementary veterinary guidance available for free access from the BVA website³.

The principles of RUMA guidance and best practice are further reinforced by at least 2 of the main UK farm assurance schemes (the RSPCA's Freedom Foods and Assured British Meat Red Tractor). Members of these schemes are recommended to read the RUMA guidance as an integral component of the scheme standards.

The UK farming industry feels that it is vitally important that its Continental European counterparts embrace the wealth of knowledge and experience available to it within the European Platform for the Responsible Use of Medicines in Animals (EPRUMA). The UK and RUMA objectives are very much in line with those of EPRUMA and we feel that this network, if supported adequately by the Member States and European policy makers, could provide the framework and momentum to achieve European harmonisation of activities relating to the reduction of AMR.

There is a lot of truth in the old saying that 'knowledge is power'. Even within the UK, we are still not able to produce absolute like for like (harmonised) reports of antimicrobial use and resistance amongst all sectors of medicinal users (human and animal) although we are improving and nearing harmonisation.

² BVA poster can be accessed online and shows an 8 point plan for avoiding AMR:

http://www.bva.co.uk/public/documents/BVA_Antimicrobials_Poster.PDF

³ BVA general guidance on veterinary medicines: http://www.bva.co.uk/activity_and_advice/1633.aspx

Various agencies within the UK have recently published their second report giving an overview of antimicrobial usage and bacterial resistance in selected human and animal pathogens in UK (2007)⁴. This report has been compiled by the various agencies dealing with public health or the health of animals produced for food. It brings together data on antimicrobial consumption, significant pathogens and their antimicrobial susceptibilities across the fields of human health, animal health and food.

This report is not yet fully harmonised across sectors as methods of surveillance and analysis, and the geographic areas covered differ. However, it is anticipated by the authors that future reports will reflect greater integration as greater harmonisation across all sectors is achieved. Nevertheless, this report is seen as a useful tool to stimulate discussion, to help keep AMR surveillance data under active review with the ultimate goal of preventing further AMR proliferation.

Even with its current limitations, the report has been able to highlight that for a number of bacterial species, there have been only limited changes to the degree of AMR described in this 2007 report compared to the initial report covering 2004. One other interesting finding from this report is that in humans β -lactams were the most commonly prescribed antimicrobial agent comprising 66% of antimicrobials used in the community in the UK and 77% of antimicrobials used in hospitals in England and Wales. In contrast, tetracyclines accounted for 45% of total antimicrobial use in animals, while β -lactams accounted for just 19%.

In addition to this report, every year the sales data of antimicrobial products used as veterinary medicines, growth promoters and coccidiostats in the UK have been collated and published by the Veterinary Medicines Directorate⁵ for over 10 years. This, although highly technical, is an extremely useful document, as it is providing trends relating to individual livestock sector usage.

Reports such as these are part of the English and Welsh Government commitments to develop and implement a programme of surveillance for AMR in animals in England and Wales⁶ with Scotland providing similar information for its own administrative needs.

The UK farming industry would urge its European counterparts, through the European Commission, to implement similar data collections as soon as possible. These must allow like for like comparisons across all Member States (human and animal sectors) however to be useful.

It is vitally important when planning any such surveillance programme that the monitoring data covers all member states and non-EU countries who import food products into Europe. Ideally, the monitoring of resistance should be done on as wide a scale as possible, as AMR, like many things, does not recognise national boundaries.

The UK farming industry strongly urges the European Commission to concentrate on implementation of current commitments and legislation regarding AMR monitoring before implementing or introducing any additional commitments.

⁴ 'Overview of Antimicrobial Usage and Bacterial Resistance in Selected Human and Animal Pathogens in the UK:2007'
http://www.vmd.gov.uk/Publications/Antibiotic/AMR_Overview_07.pdf

⁵ Sales of Antimicrobial Products used as Veterinary Medicines, Growth Promoters and Coccidiostats in the UK:
<http://www.vmd.gov.uk/Publications/Antibiotic/AntiPubs.htm>

⁶ Defra's Strategy for Developing and Implementing a Programme of Surveillance for Antimicrobial Resistance in Animals in England and Wales <http://www.vmd.gov.uk/Publications/Antibiotic/progsurvantires.pdf> with updated pages available at <http://www.vmd.gov.uk/Publications/Antibiotic/strategy.pdf>