Food Industry Initiative on ANTIMICROBIALS

FIIA Policy on Responsible Use of Antibiotics

1. **FIIA members will observe the current European Medicines Agency (EMA) Antimicrobial Advice ad hoc Expert Group (AMEG) categorisation of antibiotics.**
   The EMA AMEG ranks antibiotics by considering (within the geographical area of Europe) both the risk that their use in animals causes to public health through the possible development of antibiotic resistance, and their availability and need to use them in veterinary medicine. FIIA members also observe the stewardship advice attached to the use of active ingredients in each category:
   a. Category A ('Avoid') antibiotics may not be used in food-producing animals.
   b. Category B ('Restrict') antibiotics are critically important in human medicine and their use in animals should be restricted to mitigate the risk to public health.
   c. Category C ("Caution") covers antibiotics for which alternatives in human medicine generally exist in the EU, but only few alternatives are available in certain veterinary indications. These antibiotics should only be used when there are no antimicrobial substances in Category D that would be clinically effective.
   d. Category D ("Prudence") includes antibiotics that should be used as first line treatments, whenever possible. These antibiotics should be used in animals in a prudent manner.

2. **FIIA members will align with the Responsible Use of Medicines in Agriculture (RUMA) Alliance policies and objectives.**
   a. FIIA endorses and supports RUMA targets for responsible antibiotic use from 2021 to 2024, and members commit to having a responsible use strategy and targets in place towards achieving these wider goals as well as their own.
   b. FIIA members will encourage a targeted approach to antibiotic use encompassing proactive/preventative health planning and regular (at least annual) reviews of antibiotic use with the farm vet, in line with most farm assurance schemes.
   c. FIIA members will not permit routine preventative use of antibiotics within their supply chains. Preventative treatments are only acceptable when they are:
      i. To treat animals diagnosed at high risk of bacterial disease.
      ii. Prescribed by vets who have direct responsibility for those animals.
      iii. Not used as compensation for poor hygiene or in place of improvements in husbandry which could reduce the need for treatment.
   d. Preventative treatments should be administered to individual animals where possible, except in species which cannot be treated individually without stress or harm, and where group treatment is in accordance with veterinary best practice.

e. FIIA members will ensure that highest priority critically important antibiotics (HP-CIAs), defined by EMA as Category B (3rd and 4th generation cephalosporins, quinolones including fluoroquinolones, and colistin[1]) are only used:
    i. as a last resort to treat clinically present disease, never preventatively
    ii. when needed to safeguard animal health and welfare
    iii. when no alternative treatment option is available
    iv. when it is known the treatment will be effective.

3. **A consistent, non-competitive and best-practice approach to stewardship is key; however, some specific variances are acknowledged.**
    a. Sector-level exceptions to adopting the EMA categorisation and approach to stewardship of antibiotics are as follows:
        i. In the UK poultry meat sector only, where macrolides (Category C) are treated as Category B products (or HP-CIAs under WHO categorisation) with the same 'restrict' approach applied. This recognises the risk of campylobacter in poultry meat as a food-borne pathogen, and the need to treat severe campylobacteriosis, particularly in children, with macrolide products.
        ii. In the UK laying hen sector only, there is an historic precedent that colistin (Category B) is no longer used for laying hens managed under the Lion Code.
    b. Variances by individual FIIA members to the specific approaches laid out in this policy are accommodated provided:
        i. There is a clear scientific rationale that justifies this variance.
        ii. Once introduced, the variance is stated where the member points to the FIIA policy, alongside the justification.
    c. FIIA members intending to implement variances are encouraged to raise these with other members in the interests of transparency, and to allow discussion about whether the variance should be adopted more widely in FIIA policy.
    d. Variances in FIIA members' policies on antibiotic stewardship outside of the areas covered within this policy are accepted.

4. **FIIA members will adopt the definitions of prophylaxis (preventative use) and metaphylaxis from European Union Regulation 2019/6.**
    a. "Prophylaxis means the administration of a medicinal product to an animal or group of animals before clinical signs of a disease, in order to prevent the occurrence of disease or infection"
    b. "Metaphylaxis means the administration of a medicinal product to a group of animals after the diagnosis of clinical disease in part of the group has been established, with the aim of treating the clinically sick animals and controlling the spread of the disease to animals in close contact and at risk which may already be sub-clinically infected"

[1] While colistin is a Category B antibiotic, its use in the UK has fallen to virtually nil (sales of 1.2kg in total for 2019, or 0.0002 mg/kg). It can therefore be assumed that colistin use has currently stopped in almost all supply chains, and some FIIA members have stated their supply chains do not currently use it.

5. **The FIIA Policy on Responsible Use of Antibiotics will be reviewed annually.**
    a. FIIA undertakes to review its policy annually in light of changing evidence and practice, and update as necessary

The new Veterinary Medicines Regulation (Regulation (EU) 2019/6) and Medicated Feed Regulation (Regulation (EU) 2019/4) are due to come into effect in the EU from 28 January 2022. The UK is continuing its work on proposed amendments to the Veterinary Medicines Regulations 2013 to reflect the European changes. The Veterinary Medicines Directorate plans to carry out a formal consultation late 2021/early 2022 on proposed changes, with the revised UK regulations coming into force in 2022 or early 2023. FIIA will review its policy once further detail on changes in UK regulation are known.