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. This 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. However, it should be noted that the latest iteration of the World Health Organization's medically important antimicrobials list now aligns with AMEG's¹.
 - a. FIIA members will observe the stewardship advice attached to the use of active ingredients in each category:
 - i. Category A ('Avoid') antibiotics may not be used in food-producing animals.
 - ii. Category B ('Restrict') antibiotics (also called Highest Priority Critically Important Antibiotics or HPCIAs) are critically important in human medicine and their use in animals should be restricted to mitigate the risk to public health.
 - iii. 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.
 - iv. 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.
 - b. **The EMA may move categorisation of certain products upwards or downwards**, and this change of risk levels should be observed by FIIA members.
 - c. **FIIA** members agree they will not unilaterally 'elevate' products to a higher category (for example, restricting macrolides or aminoglycosides as if they are Category B products when they are Category C use with Caution) without sound and evidenced reason as described in point 4 within this policy. This is to prevent: any conflict with veterinary advice; increased risk to animal health and welfare; increased selection pressure and therefore risk of resistance among remaining products; and increased risk of products being delisted for commercial reasons.
- 2. FIIA members will adopt the definitions of <u>prophylaxis</u> and <u>metaphylaxis</u> as in <u>European Union Regulation 2019/6</u> and <u>Veterinary Medicines (Amendment etc.)</u>
 <u>Regulations 2024</u> (UK VMRs).
 - a. "**Prophylaxis** (or prophylactic treatments) 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". This is also called preventative use.
 - b. "Metaphylaxis (or metaphylactic treatments) 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 WHO's 2024 categorisations reclassify macrolides from HPCIA (Category B) to CIA (Category C). However, WHO still acknowledges the importance of macrolides in treating campylobacteriosis—see section 4 of this policy.

- 3. FIIA members align with the UK's <u>Veterinary Medicines (Amendment etc.) Regulations</u>
 2024 (VMRs) and broadly mirror the <u>Responsible Use of Medicines in Agriculture</u>
 (RUMA) Alliance's policies and objectives.
 - a. **FIIA endorses and supports <u>RUMA targets for responsible antibiotic use</u>, which are reported against and updated regularly, 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 recognise and support the following principles as per the <u>Veterinary</u> <u>Medicines (Amendment etc.) Regulations 2024:</u>
 - i. Any use of antibiotics is only acceptable when:
 - 1. Required on a non-routine basis; and
 - 2. Prescribed by vets who have direct responsibility for those animals; and
 - 3. Not used as compensation for poor hygiene or in place of improvements in husbandry which could reduce the need for treatment.
 - ii. Category B products (3rd and 4th generation cephalosporins, quinolones including fluoroquinolones, and colistin³—categorised as HPCIAs by the WHO), will only be used:
 - 1. As a last resort to treat clinically present disease, never preventatively;
 - 2. When needed to safeguard animal health and welfare;
 - 3. When no alternative treatment option is available;
 - 4. When it is known the treatment will be effective.
 - iii. Prophylaxis should only be given:
 - 1. To treat animals diagnosed at very high risk of bacterial disease;
 - 2. When the consequences to the animal of not prescribing the product are likely to be severe
 - iv. Due to the recognised risk of using group prophylaxis, if a group of animals requires prophylactic treatment through group administration methods (e.g., via food, milk or water), the prescribing veterinary surgeon must:
 - 1. Clearly record the reason why (for example, stress or handling); and
 - 2. Carry out a management review as soon as reasonably practicable afterwards to identify factors and implement measures towards eliminating any recurring need for group treatment.
 - d. FIIA members also commit to the following additional principles:
 - i. While continued access to prophylaxis—especially on an individual animals basis—remains vital for animal health and welfare, members share a goal to work towards reducing and eventually eliminating the need for prophylactic treatments through advances in husbandry, management etc.
 - ii. If repeated and ongoing metaphylaxis is required, this should be investigated by the vet and measures implemented towards a goal of also eliminating the need for such treatments in the future.
 - iii. Suppliers and their veterinary surgeons are encouraged and supported to administer increasingly targeted treatments, for example by moving from in-feed to in-water to individual administration of antibiotics <u>where realistic</u>, <u>practical and appropriate</u>.

² Subject to the professional obligations of a veterinary surgeon under the Royal College of Veterinary Surgeons code of conduct to ensure the health and welfare of animals under their care, while also recognising farmers' obligations under animal welfare legislation to protect animals from pain, suffering and disease, which includes ensuring that hygiene, animal husbandry and farm management practices are adequate.

³ While colistin is a Category B antibiotic, sales have been nil since 2021. It can therefore be assumed that colistin is not used in any supply chains. Some FIIA members state their supply chains that they do not permit or use it.

4. A consistent, non-competitive approach to stewardship is key; however, some specific variances are acknowledged.

- a. Poultry meat sector and macrolides: One current sector-level exception to adopting the EMA categorisation and related approach to stewardship of antibiotics is as follows: in the UK poultry meat sector only, where macrolides (Category C) are treated as Category B products with the same 'restrict' approach applied. This recognises the specific risk of campylobacter in poultry meat as a food-borne pathogen, and the need to treat severe campylobacteriosis, particularly in children, with macrolide products. This restriction should not be extended to any other species/sector.
- b. **Colistin:** Various historic restrictions to colistin (Category B) use apply in different supply chains and sectors. For example, in the UK laying hen sector, there is a historic precedent that colistin cannot be used for laying hens managed under the Lion Code. Other direct retail supply chains have historically banned use of colistin. However, all these have been superseded by UK colistin sales equalling zero since 2021.
- c. Variances by individual FIIA members to the specific approaches laid out in this policy will be accommodated provided:
 - i. There is a clear scientific rationale that justifies this variance.
 - ii. Once introduced, the variance and justification are stated in the same location where the member points to the FIIA policy, for example on their website.
- d. **FIIA** members intending to implement variances to this policy are expected to raise these with other members in the interests of transparency, and to allow discussion about whether the variance should be adopted more widely within FIIA policy.
- e. Variances in FIIA members' policies on antibiotic stewardship outside of the areas covered within this policy are accepted, but where possible, should be avoided so as to ensure best practice, simplicity and a non-competitive approach.

5. The FIIA Policy on Responsible Use of Antibiotics will be reviewed annually.

FIIA undertakes to review its policy annually in light of changing evidence and practice, and update as necessary.