

Antimicrobial Resistance: EMA/AMEG categorisation in Veterinary Medicine in EU





The priorities for legislators and institutions are:



1) the man



2) the environment in which he lives



No government or institution will allow man to die for:

- ✓ Workplace accidents (in Italy, 1.029 deaths in 2017 – INAIL data)

→ '*Testo Unico sulla salute e sicurezza sul lavoro*', D.Lgs. n.81/2008 updated version of July 2018.



- ✓ Car accidents (in Italy, 3.378 deaths in 2017 – ISTAT data)



→ '*Decreto sicurezza*' (D.Lgs. 113/2018), Road Traffic Code amendments

- ✓ Antimicrobial Resistance (in EU 33,000 deaths/year – Ears-Net data in Italy, 10,000 deaths/year - Ar-Iss data)



→ **strategies to prevent and control antimicrobial resistance requiring global European coordination and specific national strategies, able to face local situations**

→ **strategies to prevent global warming**



Zero risk does not exist...

A recent study published in *Nature Climate Change* suggest that a link between climate change and bacterial resistance exists.

Epidemiologist from Boston Children's Hospital and the University of Toronto found that **higher local temperatures** and **population densities** correlated to a greater level of antibiotic resistance among a number of common bacterial strains (*E. coli*, *K. pneumoniae*, *S. aureus*).



The strongest associations between temperature and resistances was found in **fluoroquinolones and beta-lactam antibiotics**, suggesting that warmer temperatures may affect the way bacteria respond to certain drug mechanisms.

MacFadden et al., 2018



Critically Important Antimicrobials (CIAs)

The concept of “**critically important antimicrobials**” was originally developed following recommendations from two expert workshops (Geneva, Switzerland, 2003; Oslo, Norway, 2004) organized by Food and Agriculture Organization of the United Nations (FAO), World Organization for Animal Health (OIE), and World Health Organization (WHO), to address public health consequences of antimicrobial agents use in food producing animals.

The workshops recommended that **WHO should develop such a list of critically important antimicrobial agents in human medicine (CIAs)** and that **OIE should also develop a list of critically important antimicrobial agents in veterinary medicine (VCIA).**

The WHO CIA List was first developed in 2005, while the OIE VCIA List in 2007.

A third FAO/OIE/WHO expert meeting (Rome, Italy, 2007), considered WHO and OIE CIA lists and concluded that they should be **revised on regular basis**, in a collaborative and coordinated approach by FAO, OIE and WHO.



World Health Organization



The **World Health Organization (WHO)** is a specialized agency of the United Nations that is concerned with international public health.

It was established on 7 April 1948, and is headquartered in **Geneva, Switzerland.**

Its current priorities include communicable diseases, in particular HIV/AIDS, Ebola, malaria and tuberculosis; the mitigation of the effects of non-communicable diseases such as sexual and reproductive health, development, and aging; nutrition, food security and healthy eating; occupational health; substance abuse; and driving the development of reporting, publications, and networking.

The WHO is financed by contributions from member states and outside donors.



WHO Headquarters building in Geneva



The WHO CIA List

The WHO CIA List was first developed in 2005, and then updated every 2 years.

During the first WHO Expert Meeting on CIA for Human Health (Canberra, Australia; 2005), participants categorized antimicrobial agents used in human medicine into three groups:

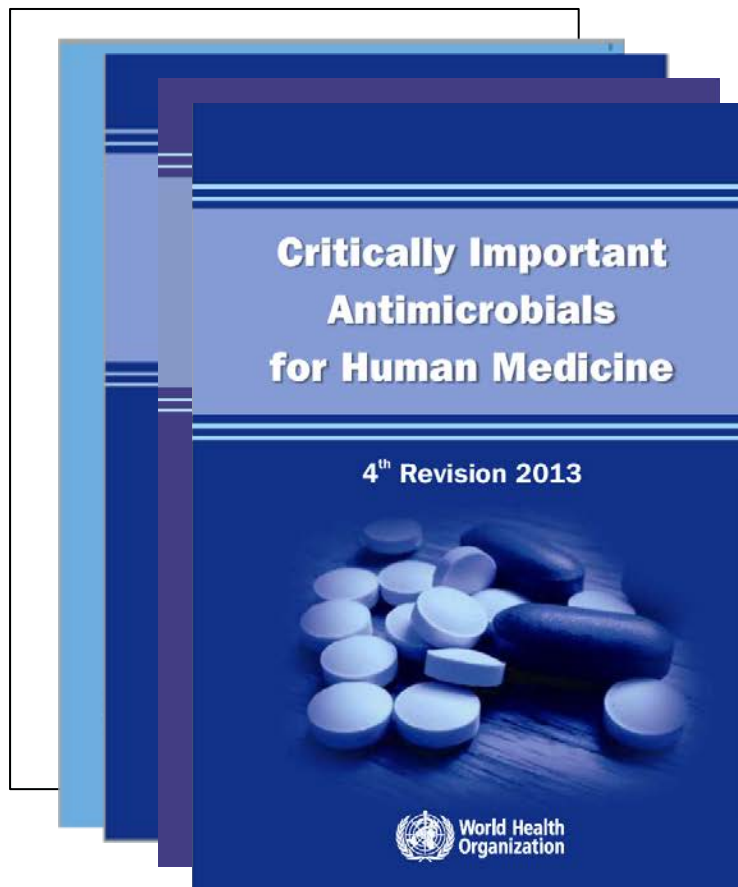
- ✓ **Critically important**
- ✓ **Highly important**
- ✓ **Important**

based on two criteria developed at the meeting:

Criterion 1: The antimicrobial class is the sole, or one of limited available therapies, to treat serious bacterial infections in people.

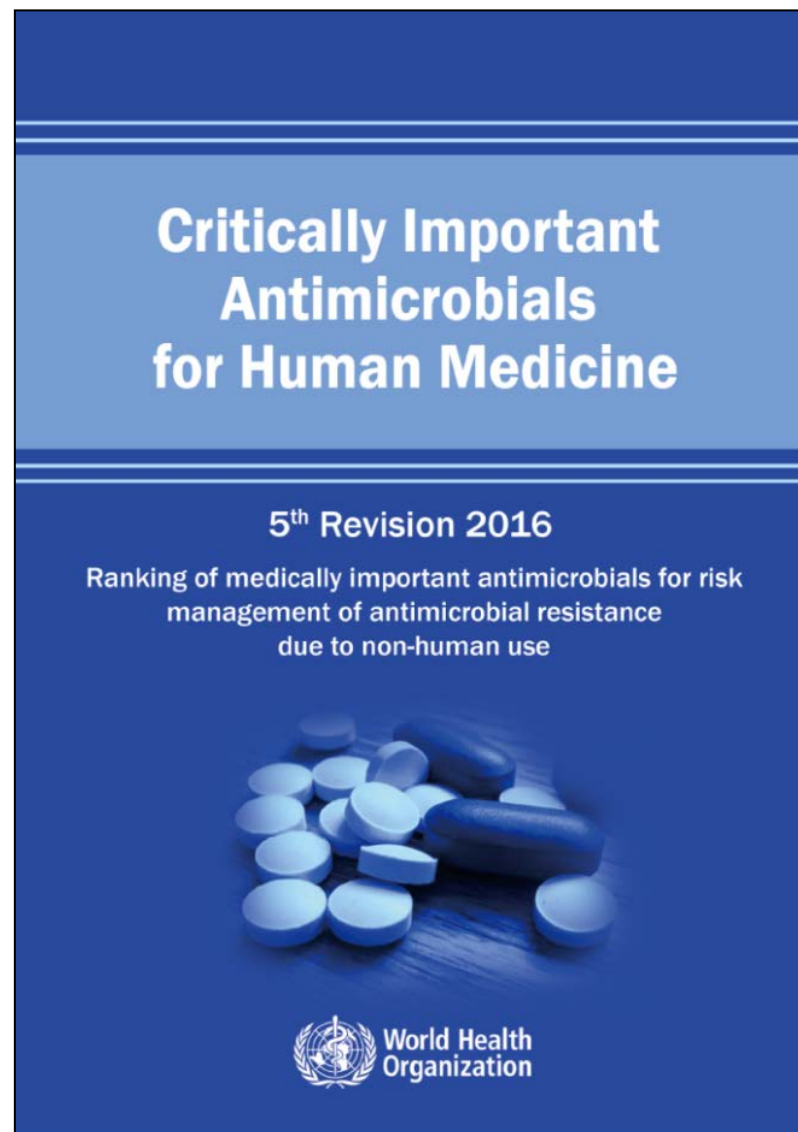
Criterion 2: The antimicrobial class is used to treat infections in people caused by either:

- (1) bacteria that may be transmitted to humans from nonhuman sources, or
- (2) bacteria that may acquire resistance genes from nonhuman sources.



The list was last updated in 2016 (**5th revision of the CIA list**).

This document is intended for public health and animal health authorities, practicing physicians and veterinarians, and other interested stakeholders involved in managing antimicrobial resistance to ensure that all antimicrobials, especially critically important antimicrobials, are used prudently both in human and veterinary medicine.



WHO Critically Important Antimicrobials for Human Medicine 5th revision

Advisory Group on Integrated Surveillance of Antimicrobial Resistance (AGISAR)

October 2016



Critically Important

| Antimicrobial class | | Criterion (Yes = ●) | | | | |
|-------------------------------------|--|---------------------|----|----|----|----|
| CRITICALLY IMPORTANT ANTIMICROBIALS | | C1 | C2 | P1 | P2 | P3 |
| <i>HIGHEST PRIORITY</i> | | | | | | |
| Highest Priority | <i>Cephalosporins (3rd, 4th and 5th generation)</i> | ● | ● | ● | ● | ● |
| | <i>Glycopeptides</i> | ● | ● | ● | ● | ● |
| | <i>Macrolides and ketolides</i> | ● | ● | ● | ● | ● |
| | <i>Polymyxins</i> | ● | ● | ● | ● | ● |
| | <i>Quinolones</i> | ● | ● | ● | ● | ● |
| <i>HIGH PRIORITY</i> | | | | | | |
| | <i>Aminoglycosides</i> | ● | ● | | ● | ● |
| | <i>Ansamycins</i> | ● | ● | ● | ● | |
| | <i>Carbapenems and other penems</i> | ● | ● | ● | ● | |
| | <i>Glycylcyclines</i> | ● | ● | ● | | |
| | <i>Lipopeptides</i> | ● | ● | ● | | |
| | <i>Monobactams</i> | ● | ● | ● | | |
| | <i>Oxazolidinones</i> | ● | ● | ● | | |
| | <i>Penicillins (natural, aminopenicillins, and antipseudomonal)</i> | ● | ● | | ● | ● |
| | <i>Phosphonic acid derivatives</i> | ● | ● | ● | ● | |
| | <i>Drugs used solely to treat tuberculosis or other mycobacterial diseases</i> | ● | ● | ● | ● | |

| Important | IMPORTANT ANTIMICROBIALS | C1 | C2 | P1 | P2 | P3 |
|-----------|----------------------------|-----------------------|----|----|----|----|
| | | <i>Aminocyclitols</i> | | | | |
| | <i>Cyclic polypeptides</i> | | | | | |
| | <i>Nitrofurantoin</i> | | | | | |
| | <i>Nitroimidazoles</i> | | | | | |
| | <i>Pleuromutilins</i> | | | | | |
| | | | | NA | | |

P3 Prioritization criterion 3

The antimicrobial class is used to treat infections in people for which there is evidence of transmission of resistant bacteria or resistance genes from non-human sources.

WHO CIA list 5th rev. : <http://who.int/foodsafety/publications/antimicrobials-fifth/en/>

AGISAR: http://who.int/foodsafety/areas_work/antimicrobial-resistance/agisar/en

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WHO/NMH/FOS/FZD/17.1



World Health Organization



WORLD ORGANISATION FOR ANIMAL HEALTH

Protecting animals, preserving our future



World Organisation for Animal Health (OIE) Headquarters building in Paris

- ✓ The need to fight animal diseases at global level led to the creation of the **Office International des Epizooties (OIE)** in 1924.
- ✓ In 2003, the Office became the **World Organisation for Animal Health** but kept its historical acronym OIE.
- ✓ The OIE is the intergovernmental organisation responsible for improving animal health worldwide.
- ✓ The OIE maintains permanent relations with nearly 75 other international and regional organisations and has Regional and sub-regional Offices on every continent. In 2018, it has a total of 182 Member Countries.
- ✓ The day-to-day operation of the OIE is managed at the Headquarters situated in **Paris, France**.
- ✓ The OIE's financial resources are derived principally from compulsory annual contributions backed up by voluntary contributions from Member Countries.

The OIE List of Antimicrobial agents of veterinary importance

The OIE List of Antimicrobial agents of veterinary importance (VCIA) was first developed in 2007 and then was further updated in 2013, 2015 and 2018.

OIE LIST OF ANTIMICROBIALS OF VETERINARY IMPORTANCE

Criteria used for categorisation

The OIE International Committee unanimously adopted the List of Antimicrobials of Veterinary Importance at its 75th General Session in May 2007 (Resolution No. XXVIII).

Background

Antimicrobial agents are essential drugs for human and animal health and welfare. Antimicrobial resistance is a global public and animal health concern that is influenced by both human and non-human antimicrobial usage. The human, animal and plant sectors have a shared responsibility to prevent or minimise antimicrobial resistance selection pressures on both human and non-human pathogens.

The FAO/OIE/WHO Expert Workshop on Non-Human Antimicrobial Usage and Antimicrobial Resistance held in Geneva, Switzerland, in December 2003 (Scientific Assessment) and in Oslo, Norway, in March 2004 (Management Options) recommended that the OIE should develop a list of critically important antimicrobials in veterinary medicine and that WHO should also develop such a list of critically important antimicrobials in human medicine.

Conclusion No. 5 of the Oslo Workshop is as follows:

5. The concept of "critically important" classes of antimicrobials for humans should be pursued by WHO. The Workshop concluded that antimicrobials that are critically important in veterinary medicine should be identified, to complement the identification of such antimicrobials used in human medicine. Criteria for identification of these antimicrobials of critical importance in animals should be established and listed by OIE. The overlap of critical lists for human and veterinary medicine can provide further information, allowing an appropriate balance to be struck between animal health needs and public health considerations.

Refinement of the list was undertaken by the OIE Collaborating Centres for Veterinary Drugs, then discussed by the *ad hoc* Group at its meeting in February 2006. A list of proposed antimicrobial agents of veterinary importance was compiled and adopted by the International Committee in May 2005. This work was officially undertaken by the OIE.

Preparation of the draft list

The Director General of the OIE sent a questionnaire prepared by the *ad hoc* Group accompanied by his

OIE LIST OF ANTIMICROBIAL AGENTS OF VETERINARY IMPORTANCE

January 2014

OIE LIST OF ANTIMICROBIAL AGENTS OF VETERINARY IMPORTANCE

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Responding to this recommendation, the OIE decided to address this task through its existing *ad hoc* Group on antimicrobial resistance. The terms of reference, aim of the list and methodology were discussed by the *ad hoc* Group since November 2004 and were subsequently endorsed by the Biological Standards Commission in its January 2005 meeting and adopted by the International Committee in May 2005. Thus, the work was officially undertaken by the OIE.

Preparation of the draft list

The Director General of the OIE sent a questionnaire prepared by the *ad hoc* Group accompanied by the letter explaining the importance of the task to OIE Delegates of all Member Countries and international organisations having signed a Co-operation Agreement with the OIE in May 2005.

Sixty-six replies were received. This response rate highlights the importance given by OIE Member Countries from all regions to this issue. These replies were analysed by the *ad hoc* Group at its meeting in February 2006. A list of proposed antimicrobial agents of veterinary importance was compiled and adopted by the *ad hoc* Group at its meeting in February 2006. A list of proposed antimicrobial agents of veterinary importance was compiled and adopted by the Biological Standards Commission in its January 2005 meeting and adopted by the International Committee in May 2005. This work was officially undertaken by the OIE.

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OIE LIST OF ANTIMICROBIAL AGENTS OF VETERINARY IMPORTANCE

Protecting animals, preserving our future

Criteria used for categorisation

List of antimicrobial agents

The OIE¹ International Committee unanimously adopted the List of Antimicrobial Agents of Veterinary Importance at its 75th General Session in May 2007 (Resolution No. XXVIII).

Background

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1 OIE: World Organisation for Animal Health
2 FAO: Food and Agriculture Organization of the United Nations
3 WHO: World Health Organization

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Criteria used for categorisation of veterinary important antimicrobial agents (OIE List)

On the basis of two criteria:

1. **importance of the antimicrobial class**
2. **treatment of serious animal diseases and availability of alternatives**

the following categories were established:

- **Veterinary Critically Important Antimicrobial Agents (VCIA)** - criteria 1 and 2
- **Veterinary Highly Important Antimicrobial Agents (VHIA)** - criteria 1 or 2
- **Veterinary Important Antimicrobial Agents (VIA)** - neither criteria 1 or 2

Antimicrobial classes/sub classes used only in human medicine are not included in the OIE List. Recognising the need to preserve the effectiveness of the antimicrobial agents in human medicine, careful consideration should be given regarding their potential use (including extra-label/off-label use)/authorisation in animals.



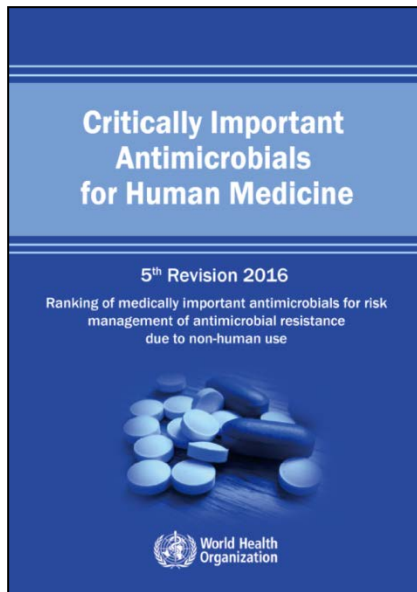
May 2018

| ANTIMICROBIAL AGENTS (CLASS, SUB-CLASS, SUBSTANCE) | SPECIES | Specific comments | VOA | WHIA | VIA |
|--|-------------------------|--|-----|------|-----|
| BICYCLOMYCIN Biccozamylin | AVI, BOV, PIS, SUI | Bicyclomycin is listed for digestive and respiratory diseases in cattle and septicemias in fish. | | | X |
| CEPHALOSPORINS | | | | | |
| CEPHALOSPORINS FIRST GENERATION | | | | | |
| Cefazolin | BOV | Cephalosporins are used in the treatment of septicemias, respiratory infections, and mastitis. | | X | |
| Cefalexin | BOV, CAP, EQU, OVI, SUI | | | | |
| Cefadroxil | EQU | | | | |
| Cefepime | BOV | | | | |
| Cefazolin | BOV, CAP, OVI | | | | |
| Cefazolin | BOV, CAP, OVI | | | | |

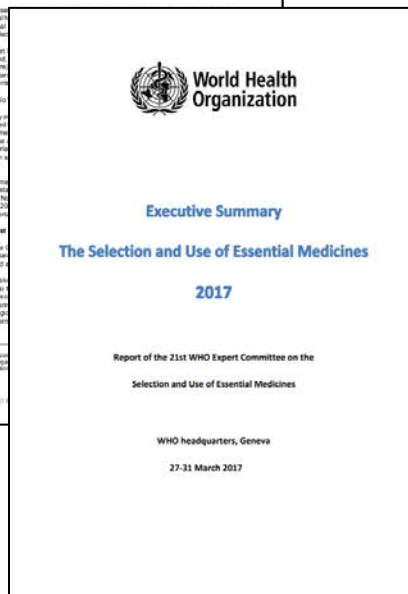
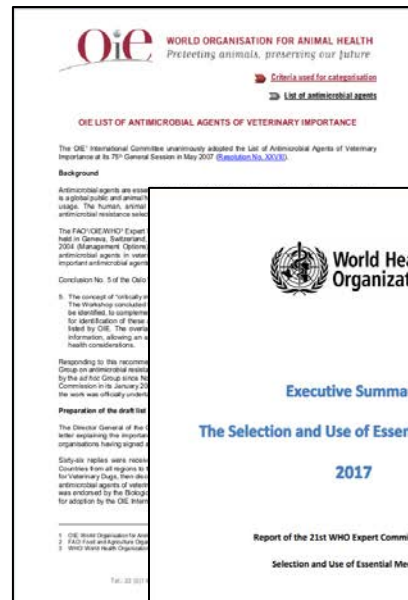
| | | | | | |
|--|--|--|--|--|---|
| CEPHALOSPORINS THIRD GENERATION Cefoperazone Ceftiofur Ceftriaxone | BOV, CAP, OVI AVI, BOV, CAP, EQU, LEP, OVI, SUI AVI, BOV, OVI, SUI | The wide range of applications and the nature of the diseases treated make cephalosporin third and fourth generation extremely important for veterinary medicine. | | | |
| CEPHALOSPORINS FOURTH GENERATION Cefquinome | BOV, CAP, EQU, LEP, OVI, SUI | Cephalosporins are used in the treatment of septicemias, respiratory infections, and mastitis. Alternatives are limited in efficacy through either inadequate spectrum or presence of antimicrobial resistance. | | | X |

| MACROLIDES (C refers to the chemical structure) | SPECIES | Specific comments | VOA | WHIA | VIA |
|---|---|---|-----|------|-----|
| MACROLIDES C14 | | | | | |
| Erythromycin | API, AVI, BOV, CAP, EQU, LEP, OVI, PIS, SUI | The wide range of applications and the nature of the diseases treated make macrolides extremely important for veterinary medicine. | | | |
| Olbandomycin | BOV | | | | |
| MACROLIDES C15 | | | | | |
| Gamithromycin | BOV | Macrolides are used to treat Mycoplasma infections in pigs and poultry, haemorrhagic digestive disease in pigs (<i>Lawsonia intracellularis</i>) and liver abscesses (<i>Fusobacterium necrophorum</i>) in cattle, where they have very few alternatives. | | X | |
| Tulathromycin | BOV, SUI | | | | |
| MACROLIDES C16 | | | | | |
| Carbomycin | AVI | This class is also used for respiratory infections in cattle | | | |
| Josamycin | AVI, PIS, SUI | | | | |
| Klaxamycin | AVI, SUI, PIS | | | | |
| Spliamycin | AVI, BOV, CAP, EQU, LEP, OVI, PIS, SUI | | | | |

The use of WHO list, in conjunction with the OIE list of antimicrobials of veterinary importance and the WHO Model Lists of Essential Medicines, will allow for prioritization of risk management strategies in the **human sector**, the **animal sector**, and in **agriculture**, through a coordinated One Health approach.



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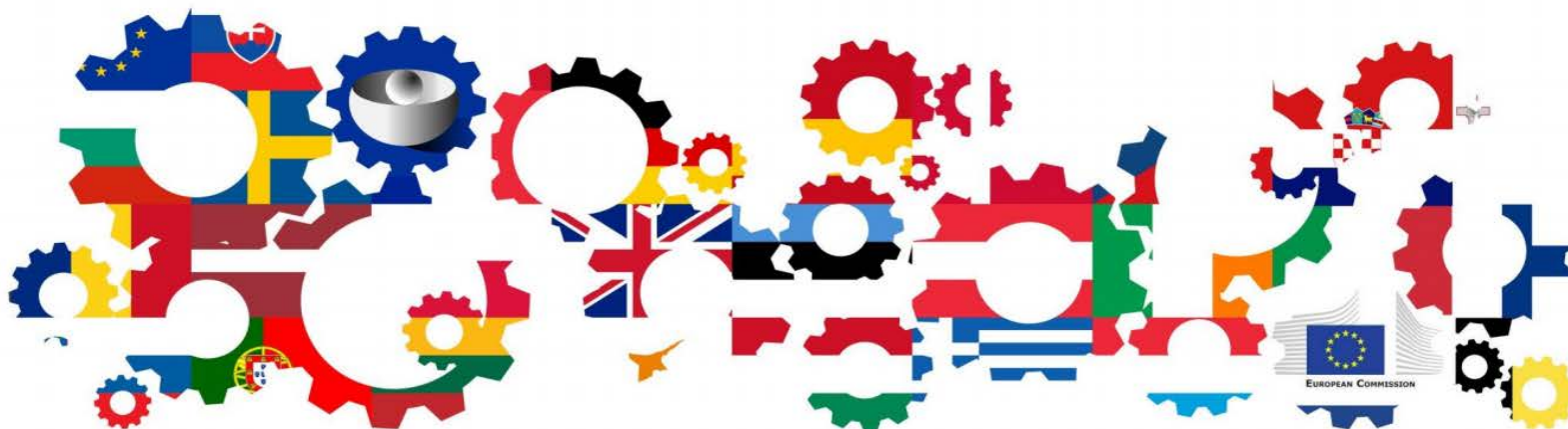
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Which is the CIA list to be considered in Veterinary Medicine in EU?



The European medicines regulatory network



The European medicines regulatory system is based on a network of around 50 regulatory authorities from the 31 EEA countries (28 EU Member States plus Iceland, Liechtenstein and Norway), the European Commission and EMA.



The European Commission is the Executive body of the EU responsible for proposing legislation, implementing decisions, upholding the Union's treaties and day-to-day running of the EU.



European Commission headquarters building in Brussels

The Commissioners (2014-2019)



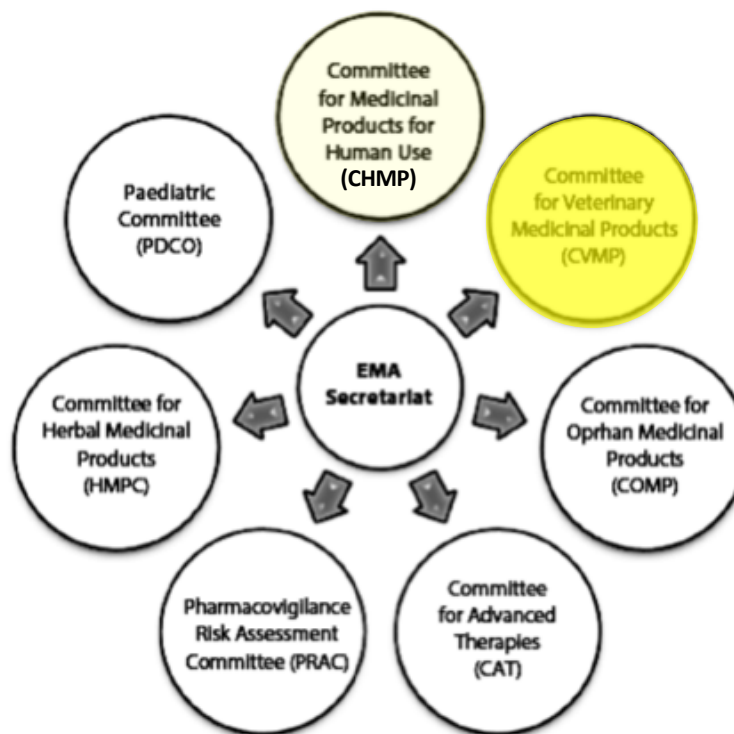
- The European Medicines Agency (or EMA) is the EU regulatory body responsible for the scientific evaluation and supervision of medicine developed by pharmaceutical companies for use in the EU (= it ensures that medicines are safe and that they work as expected).
- EMA's main responsibility is the protection and promotion of public and animal health, by carrying out scientific evaluations of medicine for human and veterinary use.
- The Agency also supervises the safety of medicines in the EU after they have been authorised. It can also give scientific opinions on medicines at the request of Member States or the European Commission.
- It is located in London (UK) but will relocate to Amsterdam (NL) following the UK's withdrawal from the EU on 30 March 2019 at the latest.



European Medicines Agency (EMA) headquarters building in London

EMA and its scientific committees

There are 7 scientific committees that evaluate medicines at the EMA – 6 of these are for medicines for human use and one, the CVMP is for veterinary products.



The EMA Committees contain members nominated by the medicine regulatory authorities of the EU Member States (the 'National Competent Authorities')




Urgent restrictions before 2013:



EMA/186029/2010 - Article 35 referral for all veterinary medicinal products containing quinolones including fluoroquinolones intended for use in food-producing species (1 July 2010)

Conclusions:
variation of the MAs of products containing quinolones including fluoroquinolones intended for use in food-producing species in order to amend the MAs where there are concerns. Reflection Paper



EUROPEAN MEDICINES AGENCY
SCIENCE

1 July 2010
EMA/186029/2010
Committee for medicinal products for veterinary use

Opinion following an Article 35 referral for all veterinary medicinal products containing quinolones including fluoroquinolones intended for use in food-producing species

Background information

On 28 April 2009, the European Commission referred to the Committee for Medicinal Products for Human Use (CHMP) Article 35 of Directive 2001/82/EC, regarding the use of fluoroquinolones intended for use in food-producing animals. The Commission requested the CHMP to ensure that the products identified are in line with the requirements of the Directive and to ensure that the products identified are in line with the requirements of the Directive and to ensure that the products identified are in line with the requirements of the Directive.

On 15 May 2009 the European Commission agreed to the CVMP proposal to take a decision to limit the scope of the current referral procedure to include in the Summary of Product Characteristics (SPC) product in line with those recommended in the Summary of Product Characteristics (SPC) for fluoroquinolones in food-producing animals (EMA/CVMP/416168/2006).

The referral procedure started on 13 May 2009. The CHMP, represented by R. Kearsley and Dr J.G. Beechinor, responded to the Commission's request on 13 May 2009. The CHMP recommended that the SPCs and package leaflets in warnings recommended in the CVMP referral for animals – Precautions for use in the SPC.

Based on the rapporteurs' assessment of the SPCs and package leaflets in warnings recommended in the CVMP referral for animals – Precautions for use in the SPC, on 11 November 2009, an opinion recommending the amendment of the SPCs and package leaflets in warnings recommended in the CVMP referral for animals – Precautions for use in the SPC.

Article 35 of Directive 2001/82/EC

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EMA/967448/2011 products containing and 4th generation species (13 January



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES

13 January 2012
EMA/967448/2011
Veterinary Medicines and Product Data Management

EMA/V/A/070

Committee for medicinal products for v

Opinion following an Article 35¹ refer
medicinal products containing system
(parenteral and oral) 3rd and 4th gener
cephalosporins intended for use in fo
International non-proprietary names (INN): ceftio

Background information

On 17 March 2011, the European Commission presented to the A
Article 35 of Directive 2001/82/EC, regarding all veterinary medic
administered (parenteral and oral) 3rd and 4th generation cephalo
producing species. The CVMP was requested to give its opinion re
advice for these antimicrobials in line with the revised reflection p
generation cephalosporins in food producing animals in the Europ
and impact on human and animal health (EMA/CVMP/SAGAM/83)
risk associated with potential misuse in poultry and the need for
need for warning sentences in the product information.

The referral procedure started on 6 April 2011. The Committee a
rapporteur and Dr Claire Chauvin as co-rapporteur. Written expl
applicants/marketing authorisation holders on 22 August 2011.

Based on the rapporteurs' assessment of the currently available c
overall benefit-risk balance for these products remains positive s
of the product information and that variations are necessary to th
authorisation for all veterinary medicinal products containing syst

¹ Article 35 of Directive 2001/82/EC

² Revised reflection paper on use of 3rd and 4th generation cephalosporins in
development of resistance and impact on human and animal health (EMA/CV
http://www.ema.europa.eu/docs/en_GB/document_library/Scientific_guideline

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Amendments in the relevant sections of the summary of product characteristics

4.1 Target species

Delete, where applicable, poultry (poultry, chicken, etc) as target species.

4.2 Indications for use, specifying the target species

Delete, where applicable, all indications related to poultry (poultry, chicken, etc).

Add, where applicable, for products indicated for bovine metritis:
The indication is restricted to cases where treatment with another antimicrobial has failed.

4.3 Contraindications

Add, to all products:
Do not use in poultry (including eggs) due to risk of spread of antimicrobial resistance to humans.

4.5 Special precautions for use

Add, to all products:
"Product name (to be completed nationally)" selects for resistant strains such as bacteria carrying extended spectrum betalactamases (ESBL) and may constitute a risk to human health if these strains disseminate to humans e.g. via food. For this reason, "product name (to be completed nationally)" should be reserved for the treatment of clinical conditions which have responded poorly, or are expected to respond poorly (refers to very acute cases when treatment must be initiated without bacteriological diagnosis) to first line treatment. Official, national and regional antimicrobial policies should be taken into account when the product is used. Increased use, including use of the product deviating from the instructions given in the SPC, may increase the prevalence of such resistance. Whenever possible, "product name (to be completed nationally)" should only be used based on susceptibility testing.

"Product name (to be completed nationally)" is intended for treatment of individual animals. Do not use for disease prevention or as a part of herd health programmes. Treatment of groups of animals should be strictly restricted to ongoing disease outbreaks according to the approved conditions of use.

Add, where applicable, for products indicated for bovine metritis:
Do not use as prophylaxis in case of retained placenta.

4.11 Withdrawal period(s)

Delete, where applicable, all withdrawal period(s) related to poultry (poultry, chicken, etc) as target species.

medicinal
(oral) 3rd
producing



veterinary medicinal
and 4th generation
orally administered
intended for use in food
amend the SPC and



EUROPEAN COMMISSION
HEALTH AND CONSUMERS DIRECTORATE-GENERAL

Director General

Brussels,
SANCO/MN/sl/ddg1.d.6(2012)8317

Dear Professor G. Rasi,

Subject: Request for advice on the impact on public health and animal health of the use of antibiotics in animals

The Commission considers antimicrobial resistance to be a public health threat which is of particular importance and to which it attaches high priority. The aims of the Communication from the Commission to the European Parliament and the Council on the 'Action Plan against the rising threats from Antimicrobial Resistance (AMR)' are to strengthen the prevention and control of antimicrobial resistance across all sectors and to secure the availability of new antibiotics.

I would like to stress, with reference to the resolutions of the European Parliament and the Council conclusions and recommendations on this subject, that the European Parliament and the Council also consider antimicrobial resistance to be a public health threat and issued a call for action.

The three agencies ECDC, EFSA and EMA are intensively involved in carrying out the Commission action plan on antimicrobial resistance. However, additional scientific advice is needed. In particular Action 7 sets out a request for scientific advice on whether the development of new classes of veterinary antibiotics could contribute to reducing antimicrobial resistance and whether these new classes could be used in the veterinary sector or should be set aside for human use.

Therefore, I would like to request EMA to provide scientific advice in accordance with the terms of reference as included in the Annex to this letter. The request is subdivided in four parts with different timelines. This approach should help the Agency to manage the workload and structure effectively the advice process. The suggested dates foreseen for the requested scientific advice on the first, second, third and fourth part are June 2013, June 2014, December 2014 and December 2014, respectively.

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In April 2013, the European Commission (EC) requested advice from the European Medicines Agency (EMA) on the impact of the use of antibiotics in animals on public and animal health and measures to manage the possible risk to humans (4 Questions).



Antimicrobial Advice Ad Hoc Expert Group (AMEG)

AMEG was set up to answer four questions posed by the European Commission **in April 2013** when it requested scientific advice from the EMA on the impact of the use of antibiotics in animals on public health and animal health and measures to manage the possible risk to humans.

The AMEG is an ad hoc group of 15 experts established jointly under the Committee for Medicinal Products for Veterinary Use (CVMP) and the Committee for Medicinal Products for Human Use (CHMP).

AMEG's tasks include:

- the **categorisation of antimicrobials** based on their risk to public health due to the development of antimicrobial resistance (AMR) following use in animals. Categorisation may have a significant impact on veterinarians' selection and use of antimicrobial medicinal products, and on national treatment guidelines;
- the development of an **early hazard characterisation assessment**. This is intended to address the risk to public health from AMR and will be assessed prior to the submission of a MAA. It will inform decisions on restricting or banning the use of a substance in food-producing species, and on the need to introduce risk management measures.

The response to Question 1 was published in July 2013 and includes advice from the Agency on the use of colistin and tigecycline in animals (EMA/443757/2013 - *Antimicrobial resistance - European Medicines Agency provides advice on use of colistin and tigecycline in animals*) as follows:

There is no available evidence on the transfer of resistance to colistin from animals to man but information on the subject is limited and more research and surveillance should be done. The advice recommends:

- ✓ **maintaining the responsible use of colistin in veterinary medicine** but restricting its use to the treatment of infected animals and those in contact with them, and to remove all indications for preventive (or prophylactic) use.
- ✓ **strengthening the systems for surveillance for resistance to colistin** in order to increase the likelihood of early detection of any rise. The benefit-risk balance for colistin to be re-evaluated if a substantial increase of resistance is detected.

Tigecycline, an antibiotic of the glycylycylcline class, is not currently approved for use in animals; there is some evidence of off-label use in dogs and cats of tigecycline products authorised for human use.

The Agency advised that currently no need is foreseen for the authorisation of tigecycline for use in animals and it is unlikely that a marketing authorisation could be granted in light of the need for this antibiotic in human medicine.





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SCIENCE · MEDICINES · HEALTH

18 December 2014
EMA/381884/2014
Veterinary Medicines Division/CVMP/CHMP

Answers to the requests for scientific advice on the impact on public health and animal health of the use of antibiotics in animals

Answer to the second request from the EC (ranking of antibiotics)

Answer to the third request from the EC (new antibiotics)

Answer to the fourth request from the EC (risk mitigation options)

| | |
|---|-------------------|
| Agreed by the Antimicrobial Advice ad hoc Expert Group (AMEG) | 24 June 2014 |
| Adopted by the CVMP for release for consultation | 10 July 2014 |
| Adopted by the CHMP for release for consultation | 24 July 2014 |
| Start of public consultation | 1 August 2014 |
| End of consultation (deadline for comments) | 30 September 2014 |
| Agreed by the Antimicrobial Advice ad hoc Expert Group (AMEG) | 24 November 2014 |
| Adopted by the CVMP | 11 December 2014 |
| Adopted by the CHMP | 18 December 2014 |

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The answers to Question 2, 3 and 4 were provided in December 2014 in the publicly available document EMA/381884/2014 - *Answers to the requests for scientific advice on the impact on public health and animal health of the use of antibiotics in animals*).

The answers were prepared by the Antimicrobial Advice ad hoc Expert Group (AMEG).

AMEG has performed an evaluation on all human CIAs based on the degree of risk to man due to resistance development following use in animals.



The EMA/AMEG 2014 Categorisation

Question 4:

The EC has requested the European Medicines Agency to provide: "Advice on the risk mitigation options [alternatives], including an assessment of costs and benefits, related with the use of certain classes of antibiotics or antibiotic substances that are critically-important in human medicine and are currently authorised as veterinary medicinal products."

Preparation of the answers

The answers were prepared by the Antimicrobial Advice ad hoc Expert Group (AMEG). The AMEG is composed of representatives and experts from the European Medicines Agency (EMA) and its Committee for Medicinal Products for Veterinary Use and Antimicrobials Working Party (CVMP/AWP) and its Committee for Medicinal Products for Human Use and Infectious Disease Working Party (CHMP/IDWP), the European Food Safety Authority (EFSA), the European Centre for Disease Prevention and Control (ECDC) and the Joint Interagency Antimicrobial Consumption and Resistance Analysis Report (JIACRA).

A stakeholders meeting was organised on 28 February 2014 and a public consultation launched with a

The AMEG proposes to classify antimicrobials from the WHO CIA list in three different categories:

- Category 1 as antimicrobials used in veterinary medicine where the risk for public health is estimated as low or limited,
- Category 2 as antimicrobials used in veterinary medicine where the risk for public health is estimated higher and
- Category 3 as antimicrobials not approved for use in veterinary medicine.

- Category 1 as antimicrobials used in veterinary medicine where the risk for public health is estimated as low or limited,
- Category 2 as antimicrobials used in veterinary medicine where the risk for public health is estimated higher and
- Category 3 as antimicrobials not approved for use in veterinary medicine.

Category 1 includes some classes of antimicrobials that are listed as CIAs by WHO according to its criteria and for which use in veterinary medicine is extensive, but that nevertheless were considered to

³ Overview of comments received on "Answers to the request for scientific advice on the impact on public health and animal health of the use of antibiotics in animals" (EMA/381884/2014), document reference EMA/598105/2014.

⁵ For this document "antimicrobials" is defined as "active substance of synthetic or natural origin which destroys microorganisms, suppresses their growth or their ability to reproduce in animals or humans". In this context, antivirals, antiparasitics and disinfectants are excluded from the definition.

The EMA/AMEG 2014 Categorisation



The **Category 1**, with low risk of resistance included different antimicrobials like macrolides (spiramycin, tylosin), penicillin with natural and narrow spectrum, polymyxins (e.g. colistin), rifamycins (rifaximin) and tetracyclines.



Category 2, with higher risk of resistance for humans, includes 3rd and 4th generation cephalosporins (ceftiofur, cefoperazone, cefquinome), fluoroquinolones (enrofloxacin, marbofloxacin), aminoglycosides and aminopenicillins including β -lactamase inhibitors (e.g. co-amoxiclav). The use of these antimicrobials in veterinary medicine is considered acceptable provided that specific restrictions are placed on their use like not being used as first choice antibiotic.



Category 3 regards forbidden antimicrobials in veterinary medicine.

The AMEG categories take into account:

- ✓ the WHO categorisation of antimicrobials,
- ✓ the consumption of those antimicrobials in veterinary medicine,
- ✓ the hazards of zoonotic relevance in EU and
- ✓ the risk of resistance transfer to humans.

The AMEG classification is published on the EMA webpage:

https://www.ema.europa.eu/documents/other/answers-requests-scientific-advice-impact-public-health-animal-health-use-antibiotics-animals_en.pdf

Data summary table

The antimicrobial classes have been classified as Category 1, 2 or 3 according to the risk to public health resulting from development of antimicrobial resistance.

Table 1: Summary table

| Antimicrobial class | Hazard of zoonotic relevance (as detailed in Q2, Table 1) | Probability of resistance transfer (as detailed in Q2, Table 2) | Use in veterinary medicine (EMA/ESVAC, 2013) and information from Member States Marketing Authorisations | Concluding remarks |
|--|---|---|--|--|
| Category 1 Antimicrobials used in veterinary medicine where the risk for public health is currently estimated low or limited | | | | |
| Macrolides (including ketolides) | <i>Campylobacter</i> spp. <i>Salmonella</i> spp. | High | Approved (including group medication) | Compliance with responsible use principles is necessary to reduce the risk Measures to reinforce responsible use principles are needed |
| Penicillins, Natural | None specific | High | Approved (including group medication) | Compliance with responsible use principles is necessary to reduce the risk for co-resistance |
| Penicillins: Narrow-spectrum, β-lactamase-resistant penicillins | None specific | High | Approved (predominately intramammary formulations) | Compliance with responsible use principles is necessary to reduce the risk responsible use principles are needed due to risk for co-resistance |
| Polymyxins (e.g. colistin) | Enterobacteriaceae | Low | Approved (including group medication) | See response to Question 1 |
| Rifamycins | None specific | High | Approved (limited use predominantly in horses and intramammary formulations) | Compliance with responsible use principles is necessary to reduce the risk for co-resistance |

| Antimicrobial class | Hazard of zoonotic relevance (as detailed in Q2, Table 1) | Probability of resistance transfer (as detailed in Q2, Table 2) | Use in veterinary medicine (EMA/ESVAC, 2013) and information from Member States Marketing Authorisations | Concluding remarks |
|--|---|---|--|--|
| Category 1 Antimicrobials used in veterinary medicine where the risk for public health is currently estimated low or limited | | | | |
| Tetracyclines | <i>Brucella</i> spp. | High | Approved (including group medication) | Compliance with responsible use principles is necessary to reduce the risk for co-resistance |

| Category 2 | Hazard of zoonotic relevance | Probability of resistance transfer | Use in veterinary medicine | Concluding remark |
|--|---|------------------------------------|---|--|
| Antimicrobials used in veterinary medicine where the risk for public health is currently estimated higher | | | | |
| Cephalosporins, 3rd- and 4th-generation | Enterobacteriaceae | High | Approved (restrictions apply) | Compliance with existing restrictions is needed (see Question 4) |
| Fluoroquinolones and other quinolones | <i>Campylobacter</i> spp. Enterobacteriaceae | High | Approved (including group medication, restrictions apply) | Compliance with existing restrictions is needed |
| Class of antimicrobials for which a risk profiling is required before a final decision on its category can be made: | | | | |
| Aminoglycosides | Enterobacteriaceae <i>Enterococcus</i> spp. | High | Approved (including group medication) | Further risk profiling needed due to importance in vet med |
| Penicillins: Aminopenicillins including β- | Enterobacteriaceae <i>Enterococcus</i> spp. | High | Approved | Further risk profiling needed due to importance |

| Category 2 | Hazard of zoonotic relevance | Probability of resistance transfer | Use in veterinary medicine | Concluding remark |
|---|------------------------------|------------------------------------|----------------------------|-------------------|
| Antimicrobials used in veterinary medicine where the risk for public health is currently estimated higher | | | | |
| lactamase inhibitors combinations (e.g. co-amoxiclav) | | | | in vet med |

| Antimicrobial class | Hazard of zoonotic relevance | Probability of resistance transfer | Use in veterinary medicine | Concluding remark |
|---|--|------------------------------------|----------------------------|---|
| Category 3 Antimicrobials currently not approved for use in veterinary medicine | | | | |
| Carbapenems and other penems | Enterobacteriaceae | High | Not approved | Use in veterinary medicine should be kept at an absolute minimum due to high risk for spread of resistance. As co-resistance is an important issue, it is of high priority to decrease the total antimicrobial use in animal production in the EU |
| Ceftaroline and ceftobiprole | MRSA (Methicillin-resistant <i>Staphylococcus aureus</i>) | Low | Not approved | No specific concern identified yet |
| Cyclic esters (e.g. fosfomycin) | Enterobacteriaceae | High | Not approved | Use in veterinary medicine should be kept at an absolute minimum due to high risk for spread of resistance |
| Glycopeptides | <i>Enterococcus spp.</i> MRSA | High | Not approved | Use in veterinary medicine should be kept at an absolute minimum due to high risk |

| Antimicrobial class | Hazard of zoonotic relevance | Probability of resistance transfer | Use in veterinary medicine | Concluding remark |
|---|---|------------------------------------|----------------------------|--|
| Category 3 Antimicrobials currently not approved for use in veterinary medicine | | | | for spread of resistance |
| Glycylcyclines | Enterobacteriaceae MRSA | Low | Not approved | See response to Question 1 |
| Lipopeptides | <i>Enterococcus spp.</i> MRSA | Low | Not approved | No specific concern identified yet |
| Monobactams | Enterobacteriaceae | High | Not approved | Use in veterinary medicine should be kept at an absolute minimum due to high risk for spread of resistance |
| Oxazolidinones | <i>Enterococcus spp.</i> MRSA | High | Not approved | Use in veterinary medicine should be kept at an absolute minimum due to high risk for spread of resistance |
| Penicillins: carboxy-penicillins and ureido-penicillins including β-lactamase inhibitors combinations | <i>Enterobacteriaceae</i> <i>Enterococcus spp.</i> | High | Not approved | Use in veterinary medicine should be kept at an absolute minimum due to high risk for spread of resistance |
| Riminofenazines | None specific | Low | Not approved | No specific concern identified yet |
| Sulfones | None specific | Low | Not approved | No specific concern identified yet |
| Drugs used solely to treat tuberculosis or other mycobacterial diseases | None specific | High | Not approved | No specific concern identified yet |



Restrictions after 2014:



Polymyxins (e.g.colistin)

May 2014 - Referral procedure under Article 35 of Directive 2001/82/EC for **all veterinary medicinal products containing colistin as sole active substance for oral administration to food-producing species.**

March 2015 – Adoption of EC Decision to restrict the indications (prophylactic use of oral colistin products in food-producing species excluded, salmonellosis claim deleted), target species (horse deleted), and duration of treatment (restricted to maximum 7 days) of the concerned products, as well as to add prudent use warnings to the product information.

May 2015 - Referral procedure under Article 35 of Directive 2001/82/EC for **all veterinary medicinal products containing colistin in combination with other antimicrobial substances to be administered orally.**

July 2016 - EC recommended the withdrawal of the marketing authorisations for all veterinary medicinal products containing colistin in combination with other antimicrobial substances to be administered orally.

July 2016 - following the discovery of *mcr-1*, a horizontal transferable resistance gene in bacteria of food animal origin, **the impact of the current or future use of colistin products in veterinary medicine for animal health and welfare has been re-assessed:**


- ✓ colistin moved from AMEG Category 1 of antimicrobials to Category 2, to be used as fluoroquinolones only as 2nd choice, after the Category 1 antimicrobials have not been effective. The opinion will be reviewed in 3-4 years.
- ✓ in 3-4 years the consumption should be reduced of 65-80% in the countries with the highest consumption, such as Italy and Spain, without increasing the use of fluoroquinolones, cephalosporins of 3rd and 4th generation and total consumption of antibiotics



Currently in progress:

EMA/CVMP/AWP/721118/2014 - Reflection paper on use of aminoglycosides in animals in the European Union: development of resistance and impact on human and animal health (21 June 2018)

All veterinary-authorized AGs, including **spectinomycin**, would be placed in Category 2 (higher risk for public health), a further stratification is foreseen for some AGs, based on active substances and/or route of administration.



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21 June 2018
EMA/CVMP/AWP/721118/2014
Committee for Medicinal Products for Veterinary Use (CVMP)


Reflection paper on use of aminoglycosides in animals in the European Union: development of resistance and impact on human and animal health

| | |
|--|-----------------|
| Draft agreed by Antimicrobials Working Party (AWP) | 24 May 2017 |
| Adopted by CVMP for release for consultation | 13 July 2017 |
| Start of public consultation | 25 July 2017 |
| End of consultation (deadline for comments) | 31 October 2017 |
| Adopted by AWP | 1 May 2018 |
| Adopted by CVMP | 21 June 2018 |

AGs used in veterinary medicine:

| | |
|------------|---------------------------|
| Kanamycin | Paromomycin (Aminosidine) |
| Gentamicin | Framycetin |
| Amikacin | Neomycin |
| Apramycin | Spectinomycin |
| Tobramycin | (Dihydro)streptomycin |

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1 13 September 2018
2 EMA/CVMP/AWP/842786/2015
3 Committee for Medicinal Products for Veterinary Use (CVMP)

4 Reflection paper on the use of aminopenicillins and their
5 beta-lactamase inhibitor combinations in animals in the
6 European Union: development of resistance and impact
7 on human and animal health
8 Draft

| | |
|--|-------------------|
| Draft agreed by Antimicrobials Working Party (AWP) | 9 July 2018 |
| Adopted by CVMP for release for consultation | 13 September 2018 |
| Start of public consultation | 21 September 2018 |
| End of consultation (deadline for comments) | 21 December 2018 |

9 Comments should be provided using this [template](#). The completed comments form should be sent to vet-guidelines@ema.europa.eu

10 Keywords aminopenicillins, antimicrobial resistance

ampicillin,
amoxicillin
amoxicillin-clavulanic acid



Aminopenicillins, especially those in association with clavulanic acid, have a similar spectrum to cephalosporins of 2nd and 3rd generation. They can also select and/or facilitate the development of bacteria with extended spectrum beta-lactamases (ESBLs), similar to cephalosporins of 3rd and 4th generation and fluoroquinolones. They are classified as CIA for humans (WHO) and as VCIA for animals (OIE) and for this they have been included by AMEG in **Category 2**.

Based on the assessment of the possible development of resistance and consequent impact on animal and human health, **the CVMP suggests to AMEG to consider a further stratification of the current categorization**, in order to review the priority among the substances currently present in Category 2 (fluoroquinolones, cephalosporins of 3rd and 4th generation and colistin, for which there are fewer alternatives) and the association amoxicillin-clavulanic acid, and between the latter and the aminopenicillins (amoxicillin, ampicillin). The association amoxicillin-clavulanic acid, having a broader spectrum, is indeed more likely to select multiresistant bacteria than single aminopenicillins.





1 19 July 2018
2 EMA/CVMP/849775/2017
3 Committee for Medicinal Products for Veterinary Use (CVMP)

4
5 Reflection paper on dose optimisation of established
6 veterinary antibiotics in the context of SPC harmonisation

7 Draft

Adopted by CVMP for release for consultation

Start of public consultation

End of consultation (deadline for comments)

8

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9

| | |
|----------|--|
| Keywords | antimicrobial Dose optimisation target animal risk assessment |
|----------|--|

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1 8 November 2018
2 EMA/CVMP/ERA/632109/2014
3 Committee for Medicinal Products for Veterinary Use (CVMP)

4 Reflection paper on antimicrobial resistance in the
5 environment: considerations for current and future risk
6 assessment of veterinary medicinal products
7 Draft

| | |
|---|------------------|
| Draft agreed by the Environmental Risk Assessment Working Party (ERAWP) | 30 April 2018 |
| Draft agreed by the Antimicrobial Working Party (AWP) | 30 May 2018 |
| Adopted by CVMP for release for consultation | 8 November 2018 |
| Start of public consultation | 16 November 2018 |
| End of consultation (deadline for comments) | 31 August 2019 |

8

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| | |
|----------|--|
| Keywords | antibiotic, environmental fate, human health, animal health, risk assessment, antimicrobial resistance bacteria (ARB), antimicrobial resistance genes (ARGs) |
|----------|--|

11

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8 November 2018
EMA/CVMP/AWP/237294/2017
Committee for Medicinal Products for Veterinary Use (CVMP)

Reflection paper on off-label use of antimicrobials in veterinary medicine in the European Union

| | |
|--|-------------------|
| Draft agreed by Antimicrobials Working Party (AWP) | 24 May 2017 |
| Adopted by CVMP for release for consultation | 11 July 2017 |
| Start of public consultation | 25 July 2017 |
| End of consultation (deadline for comments) | 31 January 2018 |
| Adopted by AWP | 19 September 2018 |
| Adopted by CVMP | 8 November 2018 |

| | |
|----------|---|
| Keywords | off-label use, antimicrobials, antimicrobial resistance, veterinary medicines |
|----------|---|

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The updated EMA/AMEG 2014 Categorisation



| Category 1 | |
|---|--|
| Class | Substances |
| Macrolides | Erythromycin Gamithromycin Spiramycin Tildipirosin Tulathromycin Tylosin Tylvalosin Tilmicosin |
| Penicillins, Natural | Benzylpenicillin Benethamine penicillin Penethamate (hydroiodide) Benzylpenicilline procaine Benzathine penicillin |
| Penicillins: Narrow spectrum, β-lactamase-resistant penicillins | Cloxacillin Dicloxacillin Nafcillin Oxacillin |
| Rifamycins | Rifaximin |
| Tetracyclines | Chlortetracycline Doxycycline Oxytetracycline Tetracycline |



Category 2

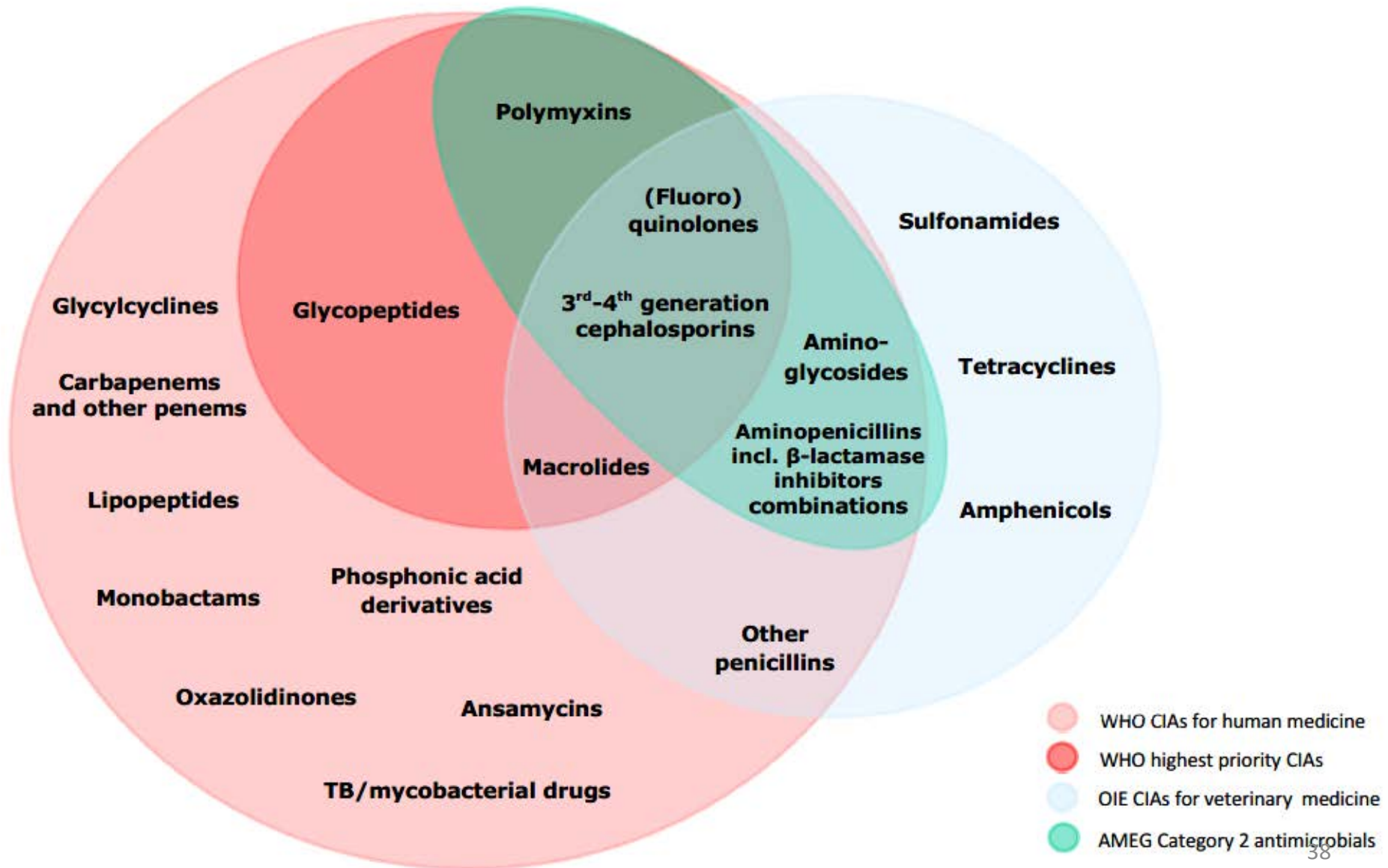
| Class | Substances |
|---|---|
| Cephalosporins 3rd- and 4rd- generation | Ceftiofur Cefquinome |
| Fluoroquinolones and other quinolones | Danofloxacin Marbofloxacin Difloxacin Enrofloxacin Flumequin Oxolinic acid |
| Polymixins (e.g. colistin) | Colistin |
| Aminoglycosides | Amikacin (Dihydro)streptomycin Framycetin Gentamicin Kanamycin Neomycin Paromomycin (aminosidine) Apramycin Spectinomycin Tobramycin |
| Penicillins: Aminopenicillins including β-lactamase inhibitors combinations (e.g. co-amoxiclav) | Amoxicillin Ampicillin Amoxicillin + clavulanic acid |

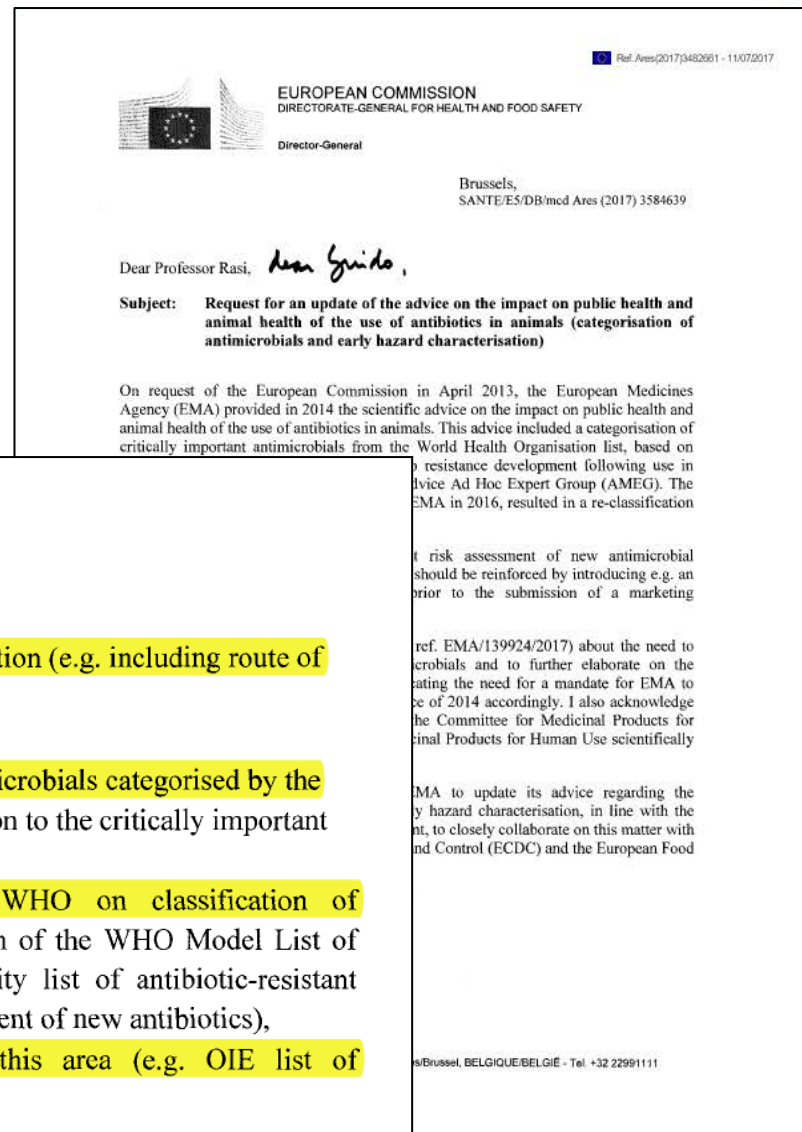
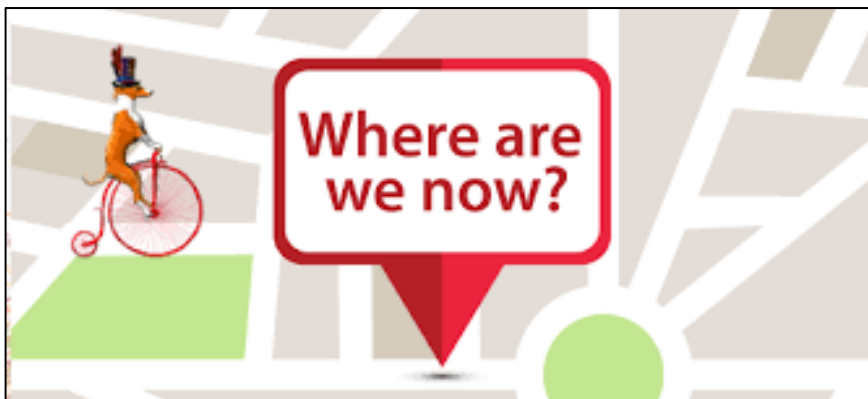


AMEG classification vs WHO classification

| Antimicrobial class | WHO 2016 classification | AMEG 2014 classification |
|--|--|--|
| 3 rd - and 4 th -generation cephalosporins | Highest priority CIAs (3 rd - and higher-generation cephalosporins) | Category 2 |
| Fluoroquinolones and other quinolones | Highest priority CIAs | Category 2 |
| Macrolides | Highest priority CIAs | Category 1 |
| Polymyxins | Highest priority CIAs | Category 2 |
| Aminoglycosides | CIAs | Provisionally included in Category 2 (but no risk profiling has been provided) Category 2 confirmed by Reflection Paper EMA/CVMP/AWP/721118/2014 dt 21.06.2018 |
| Certain penicillins (amoxicillin, ampicillin, metampicillin) | CIAs | Provisionally included in Category 2 (but no risk profiling has been provided) Category 2 confirmed by draft Reflection Paper EMA/CVMP/AWP/842786/2015 dt 13.09.2018 |

Classes of antibiotics included in the WHO, OIE and AMEG 2014 list of critically important antimicrobial agents





The EMA should address the following points:

1. Categorisation of antimicrobials

- Categorisation of aminoglycosides and penicillins,
- Further refinements of the criteria for the categorisation (e.g. including route of administration),
- Improved communication of the categorisation,
- Consideration of additional categorisation for antimicrobials categorised by the WHO⁸ as highly important and important (in addition to the critically important antimicrobials),
- Consideration of other recent work of the WHO on classification of antimicrobials and pathogens (e.g. the 20th edition of the WHO Model List of Essential Medicines and the WHO Global priority list of antibiotic-resistant bacteria to guide research, discovery, and development of new antibiotics),
- Consideration of any other relevant work in this area (e.g. OIE list of antimicrobial agents of veterinary importance).



The route of administration has been already used as refinement of the criteria for the EMA/AMEG Categorisation in 2014 (e.g. for rifamycins/rifaximin).



| Antimicrobial class | Summary of veterinary use in the EU | Risk management measures implemented by some countries |
|---------------------|--|--|
| Rifamycins | <p>Limited use in veterinary medicine.</p> <ul style="list-style-type: none"> • <u>Indications:</u> Rifamixin is the only substance of the group authorised for use in food producing species with indications limited to intramammary or intrauterine use • <u>Pharmaceutical Form:</u> intramammary • <u>Species:</u> cattle. <p>Comment: Rifampicin is included in the list of essential substances for horses for the treatment of <i>Rhodococcus equi</i> infections in equines.</p> | <p>Those recommended by responsible use.</p> |

(from Table 8 EMA/381884/2014)

Application of EMA/AMEG 2014 categorisation

OJ of the EU, 2015/C 299/04
Guidelines for the prudent use
of antimicrobials in veterinary
medicine, 2015

| | | | |
|--|----|--|---------|
| 11.9.2015 | EN | Official Journal of the European Union | C 299/7 |
| COMMISSION NOTICE | | | |
| Guidelines for the prudent use of antimicrobials in veterinary medicine | | | |
| (2015/C 299/04) | | | |
| Table of Contents | | | |



3.2. Particular issues to be considered before using critically important antimicrobials

Many of the antimicrobials used in animals are also used in humans. Some of these antimicrobials are critical (*) for preventing or treating life-threatening infections in humans. Special consideration is necessary to ensure the continued efficacy of such antimicrobials and to minimise the development of resistance.

Before using these antimicrobials in animals, consideration should be given to the following (in addition to the points already mentioned):

- These antimicrobials should only be used in situations where a veterinarian has assessed, on the basis of antimicrobial susceptibility testing and relevant epidemiological data, that there is no non-critically important effective antimicrobial available.
- In exceptional cases where the use of these antimicrobials under off-label use (cascade) is unavoidable and legally permissible, prescription and final use should be sufficiently justified and recorded. Such use should be based on clinical grounds, i.e. the prescribing veterinarian considers the use of a particular critically important antimicrobial necessary in order to avoid the suffering of diseased animals, and should also take into consideration ethical and public health concerns. The use of critically important antimicrobials should be limited to cases where no other alternative is available.


(*) http://www.who.int/foodsafety/areas_work/antimicrobial-resistance/cia/en/
 (*) Article 10, Article 11 of Directive 2001/82/EC of the European Parliament and of the Council of 6 November 2001 on the Community code relating to veterinary medicinal products (OJ L 311, 28.11.2001, p. 1).
 (*) Commission Regulation (EU) No 37/2010 on pharmacologically active substances and their classification regarding maximum residue limits in foodstuffs of animal origin (OJ L 15, 20.1.2010, p. 1).
 (*) In April 2013, the Commission requested advice from the European Medicines Agency on the impact of the use of antibiotics in animals on public and animal health. The response to this request should be used to identify the antimicrobials to be considered in this chapter.
http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/document_listing/document_listing_000385.jsp&mid=WC0b01ac058080a585

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Application of EMA/AMEG 2014 categorisation

EC letter to EMA, 2017

Ref. Ares(2017)3482661 - 11/07/2017


EUROPEAN COMMISSION
 DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY
 Director-General

Brussels,
SANTE/ES/DB/mcd Ares (2017) 3584639

Dear Professor Rasi, *Dear Guido,*

Subject: Request for an update of the advice on the impact on public health and animal health of the use of antibiotics in animals (categorisation of antimicrobials and early hazard characterisation)

On request of the European Commission in April 2013, the European Medicines Agency (EMA) provided in 2014 the scientific advice on the impact on public health and animal health of the use of antibiotics in animals. This advice included a categorisation of critically important antimicrobials from the World Health Organisation list, based on their animal health impact.

Further to this, the EMA has updated its advice on the impact on public health and animal health of the use of antibiotics in animals. This update includes a categorisation of antimicrobials from the World Health Organisation list, based on their animal health impact.

You are requested to revise your proposal in order to take into account the updated advice of the EMA. The updated advice is available on the EMA website under the heading 'Antimicrobials in animals'.

There are two categories of antimicrobials: 'critically important antimicrobials' and 'antimicrobials of concern'. The updated advice includes a categorisation of antimicrobials from the World Health Organisation list, based on their animal health impact.

Prof. Guido Rasi
 Executive Director
 European Medicines Agency
 30 Charlemagne
 London, W6A 3AX
 United Kingdom
 Commission of the European Communities

The CVMP/CHMP problem statement provides further details on the points of the previous EMA advice relating to categorisation and early hazard characterisation which need to be addressed at this stage; these points are reflected in the section II. ("Terms of reference") below.

With regard to the anticipated impact assessment, this problem statement indicates that:

- the revised categorisation may have a significant impact on the selection and use by veterinarians of antimicrobial medicinal products, on national treatment guidelines, ESVAC⁶ and JIACRA⁷,
- the early hazard characterisation may have an impact on the development and authorisation of new antimicrobials for veterinary use and on the revision of the draft CVMP guideline on assessment of the risk to public health from antimicrobial resistance due to the use of an antimicrobial veterinary medicinal product in food-producing animals.

Application of EMA/AMEG 2014 categorisation



AEMPS; 2017

REFERENCIAS:

- Report of the 3rd Meeting of the WHO Advisory Group on Integrated Surveillance of Antimicrobial Resistance, 14-17 June 2011, Oslo, Norway. Disponible en:

<http://apps.who.int/medicinedocs/documents/s21642en/s21642en.pdf>

- ECDC. 2015 The bacterial challenge: time to react. Stockholm: EMEA doc. ref. EMEA/576176/2009. Disponible en:

http://ecdc.europa.eu/en/publications/Publications/0909_TER_The_Bacterial_Challenge_Time_to_React.pdf

- EMA. 2014 Answers to the requests for scientific advice on the impact on public health and

animal health of the use of antibiotics in animals: 18 December 2014 EMA/381884/2014. Veterinary Medicines Division/CVMP/CHMP

http://www.ema.europa.eu/docs/en_GB/document_library/Other/2014/07/WC500170253.pdf

- WHO. 2011. WHO list of Critically important antimicrobials in human medicine. Third revision. In W. L. C.-i.-P. Data, editor

http://apps.who.int/iris/bitstream/10665/77376/1/9789241504485_eng.pdf

- OIE LIST OF ANTIMICROBIAL AGENTS OF VETERINARY IMPORTANCE

http://www.oie.int/fileadmin/Home/eng/Our_scientific_expertise/docs/pdf/Eng_OIE_List_antimicrobials_May2015.pdf

Application of EMA/AMEG categorisation



Eighth European Surveillance of Veterinary Antimicrobial Consumption (ESVAC) report, 2018

About the report

The eighth ESVAC report presents data on the sales of veterinary antimicrobial agents from 30 European countries in 2016, provided at package level according to a standardised protocol and template. In addition, it includes a chapter describing changes in consumption of veterinary antimicrobials for the years 2010-2016 (Chapter 2.8).

Chapter 2.8.2. focuses on the changes across time in each country. Explanations for the possible reasons for the changes across time in the various ESVAC participating countries have been provided by the ESVAC national contact points (NCs). This chapter emphasises in particular certain classes/subclasses of antimicrobials included in Category 2 of the categorisation made by the EMA Antimicrobial Advice ad hoc Expert Group (AMEG) (see classification criteria in Annex 5). The AMEG categories take into account the World Health Organization (WHO) categorisation of antimicrobials, the consumption of those antimicrobials in veterinary medicine, the hazards of zoonotic relevance in Europe and the risk of resistance transfer to humans. The AMEG classification is published on the EMA webpage³.

Category 2 of the AMEG categorisation includes those veterinary antimicrobials where the risk for public health is estimated to be higher than other classes of antimicrobials, fluoroquinolones, 3rd and 4th generation cephalosporins and polymyxins are included in this category. Macrolides are not included in Category 2 of the AMEG categorisation⁴. Aminoglycosides and certain penicillins (aminopenicillins, i.e. amoxicillin, ampicillin and metampicillin) have been recently revised by the CVMP without suggesting a category for those groups of antimicrobials⁵. A revision of the classification of AMEG is currently ongoing⁶.

Application of EMA/AMEG categorisation



UK-VARSS (2018). UK Veterinary Antibiotic Resistance and Sales Surveillance Report (UK-VARSS 2017). New Haw, Addlestone: Veterinary Medicines Directorate.

1.4.4.3 Sales of antibiotics of particular relevance to human health (mg/kg)

In VARSS reports, HP-CIAs are identified according to the categorisation by the Antimicrobial Advice *ad hoc* Expert Group (AMEG) of the EMA, and therefore include fluoroquinolones, 3rd and 4th generation cephalosporins and colistin (European Medicines Agency, 2014, 2016). Sales of HP-CIAs for food-producing animal species represented 0.28 mg/kg, a small proportion (0.8%) of the overall antibiotic sales. The sales decreased by 0.12 mg/kg (30%) between 2016 and 2017 and by 0.36 mg/kg (56%) since 2013 to 0.28 mg/kg in 2017. Between 2016 and 2017, sales of 3rd and 4th generation cephalosporins decreased by 0.03 mg/kg (21%), sales of fluoroquinolones decreased by 0.07 mg/kg (30%) and sales of colistin decreased by 0.017 mg/kg (94%) to very low levels (0.001 mg/kg), see **Figure 1.5**.

To conclude:



The best choice:

- **Cephalosporins 1st -2nd generation:** cefacetrile, cefadroxil, cefalexin, cefalonium, cefapryrin
- **Sulfonamides:** sulfadiazine, sulfadimethoxine, sulfadimidine, sulfadoxine, sulfaguanidin, sulfamethoxypyridazine, sulfaquinoxaline...
- **Amphenicols:** florphenicol, thiamphenicol
- **Others:** bacitracin, fusidic acid
- **Lincosamides:** lincomycin, pirlimycin (prudent use recommended since 2011)



The first choice:

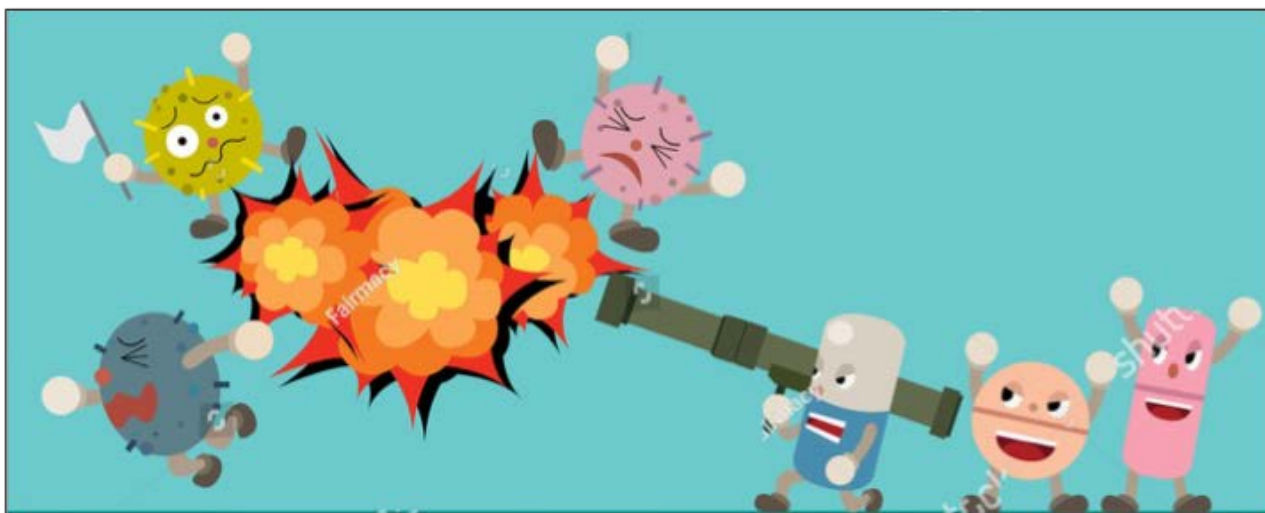
- **Macrolides:** erythromycin, gamithromycin, spiramycin, tildipirosin, tulathromycin, tylosin, tylvalosin, tilmicosin)
- **Penicillins, natural:** benzylpenicillin, benethamine penicillin, benethamate (hydroiodide), benzylpenicilline procaine, benzathine penicillin
- **Penicillins, narrow spectrum, β -lactamase-resistant penicillins:** cloxacillin, dicloxacillin, nafcillin, oxacillin
- **Rifamycins:** rifaximin
- **Tetracyclines:** chlortetracycline, doxycycline, oxytetracycline, tetracycline



The second choice:

- **Cephalosporins 3rd - 4rd generation (for systemic use):** ceftiofur, cefquinome
- **Fluoroquinolones and other quinolones:** danofloxacin, marbofloxacin, difloxacin, enrofloxacin, flumequin, oxolinic acid
- **Polymixins (e.g. colistin):** colistin
- **Aminoglycosides:** amikacin, (dihydro)streptomycin, framycetin, gentamicin, kanamycin, neomycin, paromomycin (aminosidine), apramycin, spectinomycin, tobramycin
- **Penicillins, aminopenicillins including β -lactamase inhibitors combinations (e.g. co-amoxiclav):** amoxicillin, ampicillin, amoxicillin/clavulanic acid)

Awaiting EMA/AMEG 2018 Categorisation...



...thank you for your attention!