

FIIA Antibiotic Policy Statement

Guiding principles

- **Food Industry Initiative on Antimicrobials** (FIIA) brings together retailers, manufacturers, processors and food service companies in order to promote and support responsible antimicrobial use and action on antimicrobial resistance.
- The intention of this initiative is to support and engage with existing industry groups working in this area, and to ensure that work is aligned, and duplication of effort is avoided. The initiative will promote best practice in the food industry supply chains
- The FIIA has formulated a policy with regard to responsible use of antibiotics, and the reduction of antibiotic usage without compromising standards of animal welfare.
- The policy will initially be directed at product produced in the UK, but is intended to eventually encompass all food sold in the UK.
- Data for antibiotic use will be shared between the FIIA members with due respect for commercial sensitivity and absolute confidentiality of data from individual producers.

Policy

1. The FIIA accepts the current European Medicines Agency (EMA) Antimicrobial Advice ad hoc Expert Group (AMEG)¹ categorisation of antibiotics ([Appendix 2](#)) and the stewardship advice attached to the use of active ingredients in each category: Category A (“Avoid”), Category B (“Restrict”), Category C (“Caution”), Category D (“Prudence”). **See excellent EMA infographic².**

These categories are also summarised in [Appendix 1](#).

2. The FIIA agrees to align with the Responsible Use of Medicines in Agriculture Alliance (RUMA³) policies and objectives. FIIA will stop routine (automatic) prophylactic use of antibiotics; routine prophylactic antibiotic use is a practice RUMA does not support. It will also ensure that highest priority critically important antibiotics, as defined by EMA, are only used as a last resort, when needed to safeguard animal welfare and no alternative treatment option is available.
3. The FIIA endorses RUMA targets⁴ for reduction in antibiotic usage to 2020.

In addition

4. The FIIA adopts the definitions of prophylaxis and metaphylaxis given in the European Union Regulation 2019/6 on veterinary medicinal products⁵ as follows:

“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”

¹ AMEG - European Medicines Agency Antimicrobial Advice ad hoc Expert Group
https://www.ema.europa.eu/en/documents/report/categorisation-antibiotics-european-union-answer-request-european-commission-updating-scientific_en.pdf

² https://www.ema.europa.eu/en/documents/report/categorisation-antibiotics-use-animals-prudent-responsible-use_en.pdf

³ <https://www.ruma.org.uk/>

⁴ <https://www.ruma.org.uk/wp-content/uploads/2017/10/RUMA-Targets-Task-Force-Report-2017-FINAL.pdf>

⁵ <https://eur-lex.europa.eu/eli/reg/2019/6/oj>

“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”

5. Frequently asked questions (FAQs)

The core policy aims to be brief and succinct. Further questions and technical details are addressed in the [FAQs](#) below.

APPENDIX 1

Not authorised for use in veterinary medicine in EU

AMEG Category	AMEG Advice
Category A: <ul style="list-style-type: none"> these antibiotics are NOT authorised in veterinary medicine they do not have an MRL 	Avoid: <ul style="list-style-type: none"> should not be used in food-producing animals may be given to companion animals under exceptional circumstances under the cascade

Highest Risk

AMEG Category	AMEG Advice
Category B: <ul style="list-style-type: none"> 3rd and 4th generation cephalosporin Polymyxins e.g. colistin Quinolones e.g. fluoroquinolones 	Restrict: <ul style="list-style-type: none"> antibiotics in this category are critically important in human medicine and use in animals should be restricted to mitigate the risk to public health should be considered only when there are no antibiotics in Categories C or D that could be clinically effective use should be based on antimicrobial susceptibility testing wherever possible

Other Categories

AMEG Category	AMEG Advice
Category C: <ul style="list-style-type: none"> Aminoglycosides (except spectinomycin) Aminopenicillins in combination with beta-lactamase inhibitors 1st and 2nd generation cephalosporins Amphenicols Lincosamides Pleuromutilins Macrolides Rifamycins 	Caution: <ul style="list-style-type: none"> for antibiotics in this category there are alternatives in human medicine for some veterinary indications, there are no alternatives belonging to Category D should be considered only when there are no antibiotics in Category D that could be clinically effective
Category D: <ul style="list-style-type: none"> Aminopenicillins without beta-lactamase inhibitors Tetracyclines Natural, narrow spectrum penicillins Spectinomycin Anti-staphylococcal penicillins Sulfonamides and combinations with trimethoprim Cyclic polypeptides Nitroimidazoles Steroid antibacterials 	Prudence: <ul style="list-style-type: none"> should be used as first line treatments, whenever possible as always, should be used prudently, only when medically needed

APPENDIX 2

Frequently asked questions (FAQs)

1. Q Why do the EMA AMEG categories differ from those of the World Health Organization (WHO)?

A Both AMEG and WHO categorise antibiotics according to the risk to public health due to the development of antimicrobial resistance following veterinary medicine use in animals. This is based on their need in human medicine and the risk of resistant bacteria/ resistance genes spreading from animals to humans. However, the WHO considers the global picture whereas the AMEG assessment is based on the geographical context of Europe. AMEG recommendations are therefore specifically relevant to the European public.

2. Q Does the FIIA intend to ban all prophylactic use of antibiotics?

A No. It believes “targeted prophylaxis” is justified for short to medium term treatment in exceptional circumstances where a veterinary investigation has been carried out and no other course of action is available, for example where the risk of an infection or an infectious disease is very high and the consequences/ threats to animal welfare are likely to be severe.

Examples might include instances where no vaccines are available (e.g. swine dysentery), new or re-emerging diseases, time delays before vaccine regimes take effect, temporary unavailability of vaccines, persistent predictable disease problems that prove intractable to non-antibiotic interventions. In such cases the health and welfare of the livestock remains an absolute priority.

However, antibiotic use should never become routine, or compensate for inadequate animal husbandry practices and it is vital that the farmer works with their veterinary surgeon to develop health plans that are focused on preventing disease.

3. Q Why does the FIIA use the term ‘antibiotic’ rather than ‘antimicrobial’?

A ‘Antibiotic’ refers to drugs with activity against bacteria whereas ‘antimicrobials’ include drugs active against a wide range of microorganisms including viruses, protozoa and fungi. The concern of antimicrobial resistance from a public health perspective is primarily with drugs used to combat bacterial infections.

4. Q Is the FIIA going to ban use in farm animals of antibiotics which are highest priority critically important for human medicine, e.g. colistin, 3rd and 4th generation cephalosporins and fluoroquinolones?

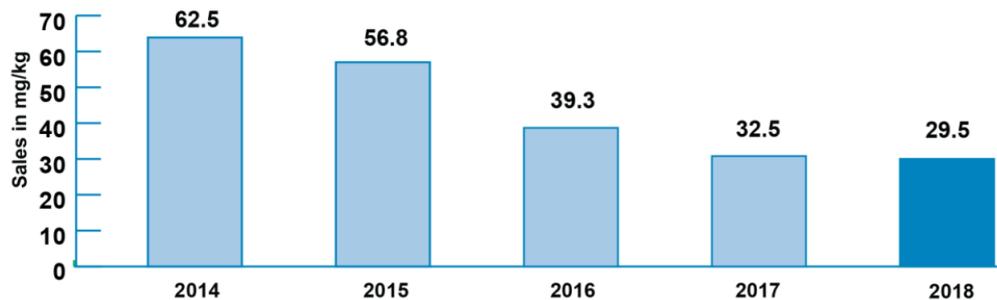
A No, the FIIA is following expert advice given by, among others, the Chief Veterinary Officer and the Veterinary Medicines Directorate. This recognises that they should remain available for veterinary surgeons to prescribe in exceptional cases where bacterial culture and sensitivity testing has been carried out, no other treatment options are available and the health and welfare of the affected animal is at risk. Veterinary sales of these antibiotics are low (representing 0.8% of total sales in 2017) and have more than halved in food-producing animals between 2013 and 2017.

5. Q Should the FIIA be advocating antibiotic-free?
A FIIA endorses the position of RUMA on this issue.
Labelling products as “Antibiotic-Free” has the potential to mislead the consumer by implying that meat or milk not marketed as such contains antibiotics, which is not the case, as there are strict rules governing the administration of antibiotics to farm animals in the UK. These rules are enforced by Government surveillance to guarantee that in meat or milk sold for consumption, antibiotics are not present above a harmless trace level set as a maximum residue limit.
A concern is that withholding antibiotics throughout an animal’s lifetime may cause unnecessary suffering and associated welfare issues by withholding treatment from sick animals in order to comply with the label, when in fact the animals should be treated. Equally, if sick animals are taken out of that supply chain and appropriately treated, then the wider system of production does still include antibiotic use, which may not be clear to consumers.
The concept of antibiotic-free production may be used to differentiate produce in some countries where use of antibiotics for growth promotion is still permitted: this is not relevant nor helpful in the EU where this practice has been banned since 2006.
<https://www.ruma.org.uk/ruma-confirms-position-on-antibiotic-free-labelling/>
6. Q Data published by retailers have shown antibiotic use lower than the RUMA targets; will the FIIA set lower targets?
A The FIIA recognises that data reported by its members are from relatively small subsets of the UK farm animal population. Furthermore, those farms from which data have been collected may have a direct relationship with the FIIA member, hence that member may have been able to offer support to help with reductions in antibiotic use. The FIIA recognises that the bigger goal is to continually improve antibiotic stewardship across the whole UK food supply chain, including those farms which do not have a direct relationship with the FIIA member.
7. Q Does every farm need to have met the RUMA targets by 2020?
A No – the RUMA targets relate to average national use and not to use on an individual farm, as it is recognised that all farms are different and have a range of animal health and welfare challenges to overcome. Farms also sell to a range of different supply chains that offer differing levels of support and investment to their producers, varying the speed with which measures to improve responsible use can be implemented. The aim of having national targets for each farm animal species is to set a bar for reductions and to encourage all farmers to benchmark their antibiotic use, which can be a powerful tool in facilitating change.

8. Q Why is the activity of the FIIA group a priority for the companies and organisations involved?

A Antibiotics should be used responsibly in order to treat sick animals effectively and reduce the risk of the development of antimicrobial resistance (AMR). There has been a reduction in the use of antibiotics in animals since 2015 (see VARSS report 2018), and a focus for industry to ensure the use of antibiotics is responsible and the pressure that is put on these valuable resources is minimised, without affecting animal health or welfare.

Sales of antibiotics for use in food-producing animals, adjusted for animal population (mg/kg), 2014-2018



Source: VARSS report 2018 (VMD, 2019)

9. Q What does 'best practice' look like?

A Best practice will vary between the different livestock sectors, production systems and within the different supply chains although there are some core principles which are central through all. In terms of antibiotic use, these core principles follow RUMA guidelines and the FIIA antibiotic policy statement.

10. Q How do members of FIIA engage with the FIIA Antibiotic Policy?

A Members of FIIA have adopted the common standards set out within the FIIA Antibiotic Policy Statement, although each may follow their own initiatives to achieve this responsible use of medicines within their supply chain.