

Ms Stella Kyriakides, European Commissioner for Health and Food Safety
Mr Janusz Wojciechowski, European Commissioner for Agriculture

European Commission
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Changes in animal farming needed to meet the EU ban on the routine preventive use of antimicrobials in animal production

Honourable Commissioner Stella Kyriakides,
Honourable Commissioner Janusz Wojciechowski,

During the World Antimicrobial Awareness Week 2020, we would like to highlight to you the dramatical threat of continuing the routine of preventive use of antimicrobials in animal production.

Basically, we would like to urge you to push for several systematic changes that are needed to fulfil the EU ban on this routine. As you are aware, preventive use of antimicrobials in groups of animals is prohibited from 28 January 2022 by Regulation 2019/6 on veterinary medicinal products. Article 107.3 prohibits the prophylactic use of antimicrobials in groups of farm animals; antimicrobials may only be administered in exceptional cases and even then only to an individual animal. As around 87% of antimicrobials are apparently being used for preventive use in groups of farm animals – a practice that will be illegal in 15 months' time – urgent changes are needed to prepare for the ban.

Let us remind that these changes include:

1. Reserving last resort antibiotics for human use

Last resort antibiotics should be immediately prohibited in livestock use. They are to be reserved for the treatment of life-threatening infections in humans.

According to EFSA, resistances against life-saving carbapenems and beta-lactam antibiotics are constantly rising. The same phenomena happens with colistin and fluoroquinolones - last resort antibiotics that are frequently used in animal factory farming¹.

2. Tackling veterinary dispensary

The rules for veterinary dispensary have to become stricter in the entire EU. Veterinarians should no longer have the right to prescribe and dispense antibiotics. As it is the case with

¹ <https://www.ema.europa.eu/en/veterinary-regulatory/overview/antimicrobial-resistance/advice-impacts-using-antimicrobials-animals/reducing-use-antimicrobial-agents-animal-husbandry>

https://www.ema.europa.eu/en/documents/report/ema-efsa-joint-scientific-opinion-measures-reduce-need-use-antimicrobial-agents-animal-husbandry_en.pdf

medicine intended for human use, only the pharmacy should dispense antibiotics. Otherwise, veterinarians might have great financial interest in selling antibiotics.

3. Strengthening supervision and control

We demand rigorous controls to assure the rules for antimicrobial use in animal farming are appropriately implemented. The frequency of controls must increase and official controls should take place without prior notice. Sanctions for the non-compliance with EU rules have to be a strong disincentive.

4. Mandatory labelling for the use of antibiotics - empowering consumers

Random samples of supermarket meat regularly show contaminations with multidrug-resistant bacteria in a significant number of tested meat products.

Knowing that 33.000 patients die every year in the EU from infections with multidrug-resistant bacteria, consumer must be provided with clear information on antimicrobial use on all animal-based products. Consumers must be warned before they buy food that might be contaminated with very dangerous multidrug-resistant bacteria. We also know from various surveys and studies that consumer demand more details and information on meat products. We therefore emphasize the need for a legally binding EU label visibly and with clear indications on antibiotic use.

5. Developing health-orientated systems for rearing of animals²

Improved husbandry would reduce the risk of disease. The Federation of Veterinarians of Europe states: “a positive association can be seen often between good animal welfare and reduced antibiotic use. Animals which are well cared for and appropriately housed, will be less prone to infections and will need less antibiotics. In other words, the more successful the actions aiming at improving animal health and welfare are, the more successful will be the attempts to reduce the use of antibiotics.” The Lancet Infectious Diseases Commission has stressed that instead of relying on routine use of antimicrobials, we need to develop “health-orientated systems for rearing of animals”. In such systems good health would be integral to the system rather than being propped up by routine use of antimicrobials. To put a health-oriented approach in place, we need to reduce the density of the farm animal population, reduce the stress level of animals, enable animals to perform positive natural behaviours, end the early weaning of pigs, maintain good air quality, move away from genetic selection for high production levels and minimise transport of animals.

Dear Ms. Kyrikides, dear Mr. Wojciechowski,

We are looking forward to your answer as we want to know how the Commission wants to avoid that “exceptional cases” for antibiotic treatment will become the standard case. It is of upmost importance that the Regulation 2019/6 will be properly implemented.

² Laxminarayan R *et al*, 2013. Antibiotic resistance—the need for global solutions. The Lancet Infectious Diseases Commission. *Lancet Infect Dis* 2013;13: 1057–98 [http://dx.doi.org/10.1016/S1473-3099\(13\)70318-9](http://dx.doi.org/10.1016/S1473-3099(13)70318-9)

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Yours sincerely,

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