

The O'Neill AMR Report: HealthforAnimals Reacts.

Brussels, 19 May 2016: HealthforAnimals has carefully studied the report [‘Review on Antimicrobial Resistance – final report’](#) released today. The report makes observations and policy and economic suggestions related to antibiotic use in agriculture. These seem to be mostly driven by political considerations rather than scientific reality. Some proposals are to be welcomed, but some might not have the intended impact.

The animal health industry is fully committed to limiting the development of AMR by promoting the responsible use of antibiotics in order to preserve them for future generations. Responsible use of antibiotics means: preventing disease where possible with proper animal husbandry, biosecurity measures, the use of vaccines where possible, use of antibiotics according to licensed recommendations, always under strict veterinary supervision and only when necessary.

But even where great efforts are made to prevent bacterial infections there are occasions when animals become sick and require treatment with an antibiotic. We need to maintain systems that allow the continued use of antibiotics **when they are needed** for the sake of animal health and welfare. Antibiotics should not be crudely reduced without considering the impact on animals, people and public health.

What's positive in the report?

1. **Responsible use** of antibiotics to maintain their effectiveness for future use in animals and people, as well as the proposed global public awareness campaign. This is excellent. Ultimately it is awareness on use at ground-level which must be reinforced with physicians, patients, as well as farmers and vets. The animal health sector has been working on this for decades.
2. **Improved surveillance.** From the animal side, the OIE is leading the Tripartite (OIE/FAO/WHO) project to develop a global database of veterinary products use, and countries collect data on usage in their area. In large markets like the U.S., EU and others, sophisticated data collection and surveillance systems have been in place for many years and are continually being improved.
3. **Incentivise use of vaccines.** Further encouragement of vets and farmers working together on animal health plans, and allowing animal medicines companies to publicise the availability of vaccines. In order to develop new veterinary vaccines we need improvements in regulatory processes to reduce the administrative burden and encourage innovation and societal acceptance.
4. **Better diagnostics.** Increased public sector investment in veterinary services as well as diagnostics is needed in animal health, in both developed and developing countries. The encouragement of better rapid diagnostics would be a big benefit to animal health as well.
5. **Investment in development of new and existing antibiotics and alternatives.** Further encouragement for more investment in innovation in the animal health industry is needed. We welcome the idea of a Global Investment Fund which the animal health sector will also benefit from.

What's wrong in the report?

1. The report gives the **wrong impression little has happened in animal health to fight AMR**, whereas there have been significant efforts in-country and globally/regionally for at least a decade already: policy tools, veterinary and animal health practices and awareness campaigns have contributed to responsible use programmes which included authorities, vets, farmers, animal health companies and others. See here [our overview document](#).
2. The report **incorrectly suggests use in agriculture is a major contributor to AMR in humans.** The leading reports on the issue say that the major source of AMR in humans is the human use itself. The UK Department of Health, the European Medicines Agency, the U.S. Centers for Disease Control (CDC) and others have confirmed this. The UK Government's Department of

Health's Five Year Strategy on Antimicrobial Resistance states that *"Increasing scientific evidence suggests that the clinical issues with antimicrobial resistance that we face in human medicine are primarily the result of antibiotic use in people, rather than the use of antibiotics in animals."*

3. The mention of **"70% of antibiotics are sold in animals in the US"** is misleading. Comparisons of the tonnage of antibiotics used in human and animal health are meaningless because there are many, many more animals than there are people globally, but also the considerably larger biomass of livestock. For example, in the UK alone, a country of 64 million people, 18 million broiler chickens are slaughtered per week (circa 1 billion chickens per year). Also consider that a fully grown beef bull could weigh the same as up to ten average adult humans.
4. The report is **not global** and makes assumptions for the rest of the world from a UK-centric stance, not fully considering differences in systems globally. As the report says, Denmark as a model is only relevant for some developed countries. Almost three quarters of animal production in Denmark is pig production, unlike most other countries in the world. Danish government reports demonstrate resistance rates in people have **not** been affected by changes in agricultural use of antibiotics.
5. The report is **negatively biased towards agriculture**. It does not mention the importance of prevention of animal suffering and ignores our moral and legal obligation to animals in our care and the vital role antibiotics play in this. A safe and secure food chain is too easily taken for granted with little recognition given to the role antibiotics play in the substantial efforts by farmers to produce wholesome, safe and nutritious food.
6. The report **proposes ending use of antibiotic growth promoters**, but fails to mention that this significant activity is already ongoing. The practice was discontinued in Europe in 2006, and the use of medically important antibiotics as growth promoters will be discontinued in the US in 2017.
7. The report recommends setting **national reduction targets in agriculture**. The WHO Global AMR action plan provides a holistic approach that has already been agreed by all WHO Member States calling for countries to develop and implement tailored national plans. Many have already done so. The overarching target should focus on reduction of the development and dissemination of AMR, as the problem is not use *per se*, but rather "inappropriate" or misuse.
8. The report mentions a **possible tax on antibiotics**: a tax-based system on antibiotics could lead to sick animals not being treated which would impact animal welfare. Furthermore, on top of all the other uncertainties additional taxes would be a considerable disincentive for research and development in the antibiotic segment of the animal health industry.

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Notes for editors

HealthforAnimals represents manufacturers of veterinary medicines, vaccines and other animal health products in both developed and developing countries across five continents. The mission of HealthforAnimals is to foster a greater understanding of animal health matters and promote a predictable, science-based regulatory environment that facilitates the supply of innovative and quality animal medicines, vaccines and other animal health products into a competitive market place. These products contribute to a healthy and safe food supply as well as a high standard of health and welfare for animals and people. www.healthforanimals.org

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