



**FVE REACTION TO
the EPHA report titled
“Ending routine farm antibiotic use in Europe”**

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The Federation of Veterinarians of Europe (FVE), representing around 300 000 veterinarians across 39 European countries, took note of the report titled ‘Ending Routine farm antibiotic use in Europe’¹ published by the European Public Health Alliance.

FVE agrees with what we believe is, or maybe should be, **the author’s final objective: combatting the emergence and spread of antibiotic resistance and the preservation of effective antibiotics for people and animals.** Exactly for that reason the Federation has taken many initiatives over the last 15 years. Through raising awareness, collaboration with other stakeholders, promoting veterinary best practices including improving the health and welfare of farm animals, among others, a marked reduction in antibiotic use has been achieved.

FVE nevertheless **disagrees** with the author’s **unbalanced, one-sided approach towards this goal.** For FVE, the only way forward is through a “One Health approach”, recognizing that the health of people, animals and the environment are closely connected and must be addressed in a joint way. A concept that - although referred to in the report, seems to be clearly misunderstood by the author. **“One Health” does not mean subordinating animal health to public health.**

In this context, we wish to remark that by far the biggest trigger for antibiotic resistance in public health lies in the use of antibiotics for people. In Europe, the use of antibiotics is currently higher in humans than in animals². Scientific peer-reviewed literature estimates that more than 75% of the total burden of infections with antibiotic-resistant bacteria in EU and EEA countries are associated with human healthcare³. Even if we would stop all antibiotic use in animals, the impact to the human antimicrobial resistance problem would not be significant.

In many European countries, significant progress is made in reducing antibiotic use in animals⁴, followed by a reduction in resistance². That is the result of

¹ European Public Health Alliance (EPHA): <https://epha.org/ending-routine-farm-antibiotic-use/>

² European Centre for Disease Prevention and Control (ECDC)/European Food Safety Authority (EFSA)/European Medicines Agency (EMA) Third JIACRA report: <https://www.ecdc.europa.eu/sites/default/files/documents/JIACRA-III-Antimicrobial-Consumption-and-Resistance-in-Bacteria-from-Humans-and-Animals.pdf>. See page 17-fig 6 and page 85-fig 60

³ European Centre for Disease Prevention and Control (ECDC): [https://www.thelancet.com/journals/laninf/article/PIIS1473-3099\(18\)30605-4/fulltext](https://www.thelancet.com/journals/laninf/article/PIIS1473-3099(18)30605-4/fulltext)

⁴ European Medicines Agency (EMA): https://www.ema.europa.eu/en/documents/leaflet/responsible-use-antibiotics-protects-animals-people-2011-2020-sales-antibiotics-veterinary-use-are_en.pdf

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strong commitment of the whole animal health sector to the implementation of veterinary best practices and to monitoring their effectiveness by monitoring the need to use antibiotics. We are moving the right direction. This is why, FVE together with the whole animal health sector, is further working on reducing more antibiotics. We fully agree that antibiotics should not be used to mask poor husbandry practices. However, in case animals do get sick, we must be able to treat them using the antibiotics in a prudent and responsible way. Since most animals are kept in groups, group treatment can be the most effective and safe option for disease control.

The **EPHA report is on many aspects incorrect, biased, and missing a holistic approach towards animal health and welfare and public health.** The report lacks to recognise the enormous efforts made by farmers and veterinarians. Antimicrobial use in animals in the EU almost halved in the last 10 years⁵. Besides that, animal health and welfare standards are higher in the EU than anywhere else in the world. The EU has also stringent inspections on residues of veterinary medicines and contaminants in animals and animal-derived food and an overall monitoring system, which show very the high compliance of the sector with all safety standards⁶.

In respect to the specific targets proposed in the report:

- **Target 1: set a maximum level of 30 mg/kg per population correction unit (PCU) to be later decreased to 15 mg/kg PCU.** This is not realistic as there are differences in the occurrence and spread of bacterial diseases, animal population, etc. per country.
- **Target 2: set a target for only 30% of all treatments to be group treatment, which will be further decreased later to 15%.** For animals kept in groups/flocks (e.g. poultry, rabbits, pigs), group/flock treatment through drinking water or feed is often the safest and most effective method of administration. Regulation (EU) 2019/4 introduces strict rules for manufacturing and use of medicated feed, while (EU)2019/6 ensures the use of in feed or water medication in full compliance with responsible use practices. Catching and parenteral injecting individual animals can be very stressful to the animals, contrary to best welfare conditions, especially if a course of treatment involves administration of a medicine daily or multiple times per day. It should always be up to the veterinarian to decide the optimum way to administer medication, which remains under veterinary control and prescription.
- **Target 3: collect antibiotic use per species and farming system.** Antibiotic sales data are already collected now across Europe. The sector is preparing to collect antibiotic use data per species in accordance with the European legislation, however this does not involve per farming system (no good definitions exist for the different types of farming systems). The author of the report seems to suggest that small scale farming is superior to large scale farming, which is not the case. The main driver for resistance development is the level of use / misuse of antibiotics, which is not necessarily linked to farm scale or system. All depends on management conditions of the farm to prevent health problems. Resistant bacteria can be found on conventional production farms and on organic farms alike, since animals may become sick in all production systems, and so are treated whenever this is deemed necessary by a veterinarian

⁵ Federation of Veterinarians of Europe (FVE): <https://fve.org/publications/antimicrobial-use-in-animals-in-the-eu-almost-halved-in-last-10-years-due-to-strong-commitment-of-the-animal-health-sector/>

⁶ European Food Safety Authority (EFSA): <https://www.efsa.europa.eu/en/news/veterinary-drug-residues-animals-and-food-compliance-safety-levels-still-high>

(Commission Regulation (EC) No 889/2008 and Council Regulation (EC) No 834/2007).

- **Target 4: restrictions on highest-priority critically important antibiotics.** The European Commission will make a list of antimicrobials to be reserved for human medicine based on the scientific advice of the European Medicines Agency (EMA). It is important to reserve antimicrobials only on robust scientific evidence. The number of classes of antimicrobials used in veterinary medicines is very small compared to what is available on the human side. Reserving too many antibacterials for human use only will certainly hinder optimal treatment of the infections in animals, lead to animal suffering and might even endanger public health. Banning certain antibiotics for use in animals will have little effect on the human antimicrobial resistance burden and can be contra-effective⁷. Dependence on only few groups of antibiotics for the treatment of infections in animals will increase the selective pressure to clinically relevant bacteria and foster the selection and spread for antibiotic resistant organisms, thus leading to the opposite effect. Furthermore, animals deserve treatment too!

In respect to the animal husbandry and management factors suggested, they mostly relate to EU animal welfare legislation, and are outside the EU regulation on medicines. As FVE, we find it essential to advocate the interests of **animals as “sentient beings”**⁸ based on scientific evidence within the wider framework of the different pressing global policy areas, such as ensuring food safety, as well as, sustainable food production and consumption, reducing the risk of pandemics, addressing climate change, and meeting overall the United Nations Sustainable Development Goals.

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⁷ World Health Organization: [https://www.thelancet.com/journals/lanph/article/PIIS2542-5196\(17\)30141-9/fulltext](https://www.thelancet.com/journals/lanph/article/PIIS2542-5196(17)30141-9/fulltext)

⁸ Federation of Veterinarians of Europe (FVE): https://fve.org/publication_category/animal-health-welfare/