

To: Ministry for Primary Industries
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Submission on: Antimicrobial Resistance Direction Statement for Animals and Plants and Work Programme

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Submitter:

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Submission on: Antimicrobial Resistance Direction Statement for Animals and Plants and Work Programme

1. Introduction

- 1.1 Agcarm welcomes the opportunity to comment on the Antimicrobial Resistance Direction Statement for Animals and Plants and Work Programme
- 1.2 Agcarm has provided the following comments to clarify and elaborate on the Antimicrobial Resistance Direction Statement for Animals and Plants and Work Programme document.

2. Summary of the submission

- 2.1 Agcarm supports the intent of the direction statement with some minor amendments.
- 2.2 Agcarm submits that the establishment of a governance group should be a high priority.
- 2.3 Agcarm supports the development of a work programme, which will have measurable outcomes.

3. AMR Direction statement

Agcarm supports the intent of the direction statement with some minor changes:

2.7 OBJECTIVES

- *Establish and maintain a scientifically robust platform for regulatory decisions regarding AMR for animals and plants that is in line with best international practice.*

Establish and maintain robust science and risk assessment platforms for regulatory decisions regarding AMR for animals and plants that is in line best practice

- *Ensure antimicrobials are used in a prudent and responsible manner and facilitate other intervention tools to reduce the use of antimicrobials.*

Ensure antimicrobials are used in a prudent and responsible manner and facilitate other intervention tools to reduce the use, relative to risk, of antimicrobials

- *Facilitate awareness and understanding of AMR and communicate effectively with all stakeholders.*

Facilitate awareness and understanding of AMR and communicate effectively with all stakeholders, general public and media.

4. Antimicrobial resistance draft work programme

4.1 Governance of work programme

Agcarm submits that the establishment of a governance group should be a high priority. The governance group should provide oversight and prioritise the proposed work programme to manage AMR issues to ensure that the needs of New Zealand public, industry and government are met.

The current membership of the AMR Steering Committee would be a good starting point as the membership includes regulators, industry and user groups. Universities, researchers and laboratories could be used by this governance group to provide technical advice.

The terms of reference for the governance group will reflect the objectives outlined in the direction statement. Timelines should be included in the work programme.

4.2 Higher priority activities.

4.2.1 Science

3.3.1 Science

- *Develop an integrated surveillance and monitoring programme (including pre-slaughter/harvest) for AMR in foodborne bacteria (disease causing and others) from animals, plants and food.*

Assume food borne bacteria encompasses food borne pathogens (i.e. Salmonella and Campylobacter) as well as gut commensal indicators (i.e. E. coli)
There is a production animal bias, companion animals need to be given higher priority.

- *Establish an agreed standard for laboratory testing methods for antibacterial susceptibility.*

Clinical Laboratory Standards institute – subcommittee Veterinary AM susceptibility testing (VAST) is recognized as the body that sets antimicrobial susceptibility testing (AST) methods and clinical breakpoints for bacteria of animal origin. Would suggest 'following CLSI VAST established international standards for (AST) and interpretation'.

- *Establish a national system for veterinary laboratories to report to MPI on AMR findings from samples.*

Diagnostic samples might create bias towards resistance.

Diagnostic samples are inherently biased towards resistant isolates as they are typically taken and sent for diagnostic work (including antibiogram) only where there is treatment failure hence the inherent bias towards resistance. If target pathogens are also to be part of an AMR program then they should be first intent isolates (for further details see the VetPath section of de Jong A, Thomas V, Klein U, Marion H, Moyaert H, Simjee S and Vallé M. 2013. Pan-European resistance monitoring programmes encompassing food-borne bacteria and target pathogens of food-producing and companion animals. International Journal of Antimicrobial Agents, 41 (2013) 403– 409.)

- *Develop a surveillance programme of the sales and consumption of antimicrobials in animals and plants.*

Disease prevalence studies, surveillance and monitoring will be key to the work programme.

4.2.2 Regulatory

3.3.2 Regulatory

- *Review the controls (conditions of registration) and labelling of antimicrobial-based trade name products to ensure they are fit for purpose.*

Support this provided there is no extra burden on registrants.

- *Establish a regular programme of system audits on the regulatory oversight of antimicrobial-based veterinary medicines.*

Assume that this means that ACVMG will be checking their own controls.

- *Develop guidance documents on prudent use principles (including examples).*

5. LOWER PRIORITY ACTIVITIES

3.4.1 Science

- *Review international literature on the association of transfer of AMR from companion animals to humans.*

This statement assumes movement of AMR is just one way which is incorrect. Pathogens and use of antimicrobials New Zealand pets will be different compared to overseas. There is a need to know what the New Zealand situation is. Surveillance of companion animals should not necessarily be low priority. Agcarm supports companion animals being given higher priority in the proposed work programme. New Zealand studies in this area should also be looked at.

Review international literature on the association of transfer of AMR from between companion animals to and humans

6. About Agcarm

Agcarm is the industry association for manufacturers and suppliers of crop protection and animal health products. For further information and a full list of members, see www.agcarm.co.nz.

These products protect public health, improve animal welfare and help environmental management. They:

- Play a pivotal role in growing high yield, sustainable food and fibre products;
- Help supply healthy, nutritional and affordable food;
- Keep New Zealand's agriculture, horticulture and forestry sectors internationally competitive.

Our members are committed to safety, innovation and product stewardship.