Definitions – AMR: USA Comments

As noted below, in their February 2017 Report, the Code Commission invited Member Countries to comment on several definitions to establish consistent terminology when addressing the use of antimicrobials and antimicrobial resistance. The United States offers the following comments/recommendations to these definitions shown in blue font below:

Item 5.7. Antimicrobial resistance

a) Report of the ad hoc Group on Antimicrobial Resistance (January 2017)

OIE Headquarters presented the report of the ad hoc Group on Antimicrobial Resistance which met in January 2017. The Code Commission thanked OIE Headquarters for providing an update on this important work and noted that in addition to reviewing Member Countries comments on Chapter 6.7., the ad hoc Group had also proposed amendments to Chapter 6.8., which was not currently on the Code Commission’s work programme.

The Code Commission took note of the advancement of the collection of data for the 2016 annual report and the revised definition proposed for ‘therapeutic use’ and of new definitions proposed for ‘preventative use’ and ‘growth promotion’ that were intended to be included in Chapter 6.8. of the Terrestrial Code. It also noted that the definition of ‘growth promotion’ was in line with the definition used by the Codex Alimentarius Commission.

Member Countries’ are invited to comment on the following definitions as proposed by the ad hoc Group:

Therapeutic use: Administration of an antimicrobial agent to one or more animals to prevent, control or treat infection or disease. The Veterinary Medicinal Products (VMP) containing medically important antimicrobial agents should only be used on the prescription or order of a veterinarian or other suitably trained person authorised to prescribe VMP containing antimicrobial agents in accordance with national legislation and under the supervision of a veterinarian.

Rationale:
1. The term “one or more” is added for completeness.
2. Some countries utilize a system such as the veterinary feed directive which is a veterinary “order”, but not a prescription, although it serves the same function of demonstrating veterinary oversight.

Preventative use: Administration of an antimicrobial agent targeted to one or more animals at risk for a specific infection(s) or in a specific situation where disease is likely to occur if the drug is not administered, with an appropriate dose and for a limited defined duration. The Veterinary Medicinal Products (VMP) containing antimicrobial agents should only be used on the prescription or order of a veterinarian or other suitably trained person authorised to prescribe VMP containing antimicrobial agents in accordance with national legislation and under the supervision of a veterinarian. Preventive use is one of three therapeutic uses of antimicrobial agents in animals.

Rationale:
1. The term “one or more” is added for completeness.
2. Some countries utilize a system such as the veterinary feed directive which is a veterinary “order”, but not a prescription, although it serves the same function of demonstrating veterinary oversight.
3. The term "limited" is a subjective term while the term “defined” allows the veterinarian to utilize their medical judgement on the appropriate duration of therapy.

4. Therapeutic use states “…to prevent, control, and treat infection or disease…”, but later in the document separates preventative use from therapeutic uses. For clarity, consider either beginning or ending the definition of preventative by restating that it is a therapeutic use.

**Growth promotion:** Use of antimicrobial substances to increase the rate of weight gain and/or the efficiency of feed utilization in animals by other than purely nutritional means. The term does NOT apply to the use of antimicrobial agents for the specific purpose of treating, controlling, or preventing infectious diseases, even when an incidental growth response may be obtained. This definition is in line with the definition developed by Codex Alimentarius in CAC/RCP 61-2005.

**In addition,** the United States would like to propose a definition for “medically important antimicrobials” to be consistent with what has been proposed in other fora where the OIE has also been in attendance.

**Medically important antimicrobial drugs:** Antimicrobial drugs that are important for therapeutic use in humans.

**Rationale:** A definition of “Medically important antimicrobial drugs” is provided to make a distinction between antimicrobial drugs that are important for therapeutic use in humans and the veterinary use of other antimicrobial agents which are not relevant for therapeutic use in humans, (e.g. aminocoumarins, orthosomycins, phosphoglycolipids, polyethers/ionophores) which may be appropriately used in the absence of the same level of control measures.

“Medically important veterinary antimicrobial” is an important concept on its own and should not be linked with the lists of critically important antimicrobials as these lists have a different value. Lists of critically important antimicrobials for human and veterinary medicine help prioritize antimicrobial drugs for risk assessment and risk management. Linking "medically important" to the "lists" confuses the terms and limits their utility.