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Mr Scott Ryan
Chair
Standing Committee on Finance and Public Administration
PO Box 6100
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21 FEB 2013

Dear Senator,

INQUIRY INTO THE PROGRESS IN THE IMPLEMENTATION OF THE RECOMMENDATIONS OF THE 1999 JOINT EXPERT TECHNICAL ADVISORY COMMITTEE ON ANTIBIOTIC RESISTANCE (JETACAR)

Thank you for your letter of 6 December 2012, inviting the Victorian Government to provide a written submission on relevant matters associated with the progress and implementation of the Joint Expert Technical Advisory Committee on Antibiotic Resistance (JETACAR).

Each of the issues under the five key elements of the antibiotic resistance management program proposed by JETACAR have been addressed in Victoria's response (refer Appendix 1), focusing on the terms of reference of your committee.

Thank you for the opportunity to provide input to the committee.

Yours sincerely

Peter Walsh MLA
Minister for Agriculture and Food Security

Encl.

Appendix 1 – Victoria's response to the JETACAR Recommendations

Regulatory Controls (JETACAR Recommendations 1-9)

Streptogramins and macrolides

Although the Australian Pesticide and Veterinary Medicines Authority (APVMA) completed the review of virginiamycin in 2004 and subsequently recommended appropriate controls to minimise its use, strong opposition from the manufacturer and a lack of sufficient concrete scientific evidence led to significant delays in their implementation and eventually to the implementation of less effective controls in 2012. Victoria has assisted with implementation of controls for virginiamycin products by contributing to the development of the *Australian Veterinary Association (AVA) Code of Practice for Prescription and Use of Products which Contain Antimicrobial Agents*, which veterinary practitioners must now read before using these products, and by alerting veterinary practitioners to the new restraint statement on the product labels. This has been achieved by publishing articles in the AVA Victoria Division newsletter, the Veterinary Practitioner Registration Board of Victoria newsletter and the Cattle Veterinarians Journal, which has a national circulation. Victoria is also implementing legislation to allow enforcement of the positive restraints on the labels which apply to all persons including veterinary practitioners.

The new restraint statement on the label is not entirely satisfactory as it refers users to the AVA Code mentioned above. Ideally, all details of restraints should be on the label. It is further complicated by the fact that this product is commonly prescribed for incorporation of feed for dairy and feedlot cattle. The product with the label directions is purchased directly by the feedmills and therefore veterinarians are unlikely to see the new label restraint.

The APVMA is still to review the use of Tylosin and Kitasamycin by feed mills at low concentrations in cattle, poultry and pig feed and if needed, apply to the Standards for Uniform Scheduling of Medicines and Poisons (SUSMP) to have them reclassified as prescription animal medicines at all concentrations in the final stockfeed product. This issue was raised with the APVMA by Victoria at the meeting of the Registration Liaison Committee meeting in October 2012. Oleandomycin, another macrolide mentioned in the review, is currently only registered for use in a mastitis preparation in cattle.

Details of end use of antimicrobials

Victoria addressed the need for information about the end use of antibiotics in the 2007 control of use regulations that required both farmers and veterinarians to record the use of antibiotics and other S4 products in farm animals. A survey conducted in 2010 indicated that record keeping by farmers needed improvement and this was addressed through the Livestock Production Assurance market assurance program. Aquaculture producers were also surveyed and they, and aquaculture veterinarians, have been approached individually

to try and improve record keeping. Training has been provided to reduce reliance on chemicals in the trout industry.

Although agreement was reached by the Standing Committee on Agriculture and Resource Management (SCARM) in 1999 on how veterinary chemicals should be used nationally in Australia, there is still some variation between states that needs to be addressed and areas where improvements need to be made. This relates particularly to off-label use and the use of unregistered products and compounded products in food producing animals, which should also be governed by controls on their manufacture. This is currently under review with the National Harmonisation of Veterinary Chemical Use.

Licensing and Quality Assurance (QA) programs

Feedmills that use antibiotics in Victoria are licensed by the Department of Health and a number of feedmills have become members of the third party audited QA program, Feedsafe. Since the QA program is voluntary, there are still a number of feedmills that are not members of Feedsafe. Once the new 'Australian Standard and Guideline for Farm Animal Feed' is implemented and the standards have been incorporated in the legislation, this is likely to significantly improve membership.

While QA programs seem to be an important self-regulatory approach to managing compliance, independent third party auditors/inspectors are essential to regularly monitor these programs to encourage compliance, as is a governing body, ideally a statutory body, to act in the case of persistent non-compliance. Currently, many QA programs associated with the livestock industries are voluntary and the independence of auditors is questionable due to the use of the same veterinary firms in both treating and auditing livestock. This leads to real or perceived conflict of interest.

While codes of practice for prudent use of antimicrobials have been developed, there is a need, even with professionals, to see that they are implemented. The Victorian Pharmacy Authority (VPA), a statutory authority, licenses pharmacies in Victoria. Through the funds raised by licensing, VPA employs qualified pharmacists (authorised under drugs and poisons legislation) to visit pharmacies once every three years and conduct a screening inspection for compliance with the legislation and the authorities guidelines, provide corrective action reports with agreed time limits to comply, and report the findings to the VPA. Failure to comply with a corrective action request or a subsequent inspection revealing the same non-compliance matter, is referred to the VPA for appropriate action.

Veterinarians also need boundaries in which to operate and while these are set through the Department of Health Acts and Regulations, there is rarely any monitoring and compliance enforcement. The VPA has demonstrated the success of an enforceable QA approach that is self funding and one that could be applied to the veterinary profession particularly in relation to antimicrobial use. This would help to overcome the failure by the Department of Health to adequately monitor the sale and use of veterinary antimicrobials, and to take action over cross border sales and inappropriate dispensing practices.

Monitoring and Surveillance (JETACAR Recommendations 10-11)

Although pilot surveys of antibiotic resistance in animals and meat products were conducted by the Commonwealth Government in response to the JETACAR report, providing details of the prevalence of resistant bacteria in various food producing species and their products, they did not specifically investigate the impact of using antimicrobial products for production purposes. This would have required details of use of these products on the farms where the animals originated, and comparing animals from those farms with a history of long term use with those that did not use them at all, or had only recently implemented their use. Such information would be useful in further restricting the use, or otherwise, of the streptogramin and macrolide antibiotics and other antimicrobials such as third generation cephalosporins which are critical antibiotics for human health. These surveys need to be repeated on a more regular basis to gain some idea about trends in the development of resistance. With concrete scientific information about the impact of use of antimicrobials in Australia, medical and veterinary professionals are much more likely to change their approach to management of disease and dispensing of antimicrobials.

Infection Prevention Strategies (JETACAR Recommendations 12-14)

A number of autogenous vaccines have been produced for pigs under APVMA permits and others that have been fully registered for use in pigs. Implementation of vaccination programs is expensive and some farmers are reluctant to incorporate them into their management programs.

Housing can also have a significant impact on development of infections and some farmers are not prepared to invest capital to improve housing and animal environment to prevent diseases. Consequently, there is still considerable reliance on the use of antimicrobials on these farms.

The APVMA has attempted to restrict use on the label of third generation cephalosporins to certain respiratory conditions, and place warnings on the label about prudent use. However, the company who manufactured the most recent product, 'Excede', promoted it, when first launched, for the treatment of endometritis in dairy cattle. This promotion is of concern as it is likely to increase use of exceed over more effective products for this purpose.

Many laboratories, when conducting sensitivity testing for bacterial infections, report on all the antibiotics that are tested, including products containing third generation cephalosporins, when other less important antimicrobials are also effective. This practice encourages veterinarians to use them as a treatment of first choice. Victoria raised this issue with the Subcommittee on Animal Health Laboratory Standards and provided label

information and restraints relating to the use of all antimicrobials currently registered for use in food producing animals, to assist with reporting.

While some products have specific label instructions to only use on single animals, they are commonly used on 'multiple single animals'. This may involve injecting 200-300 animals at a time in intensive piggeries which is a disingenuous interpretation of the label with obvious adverse ramifications.

Education (JETACAR Recommendation 15-17)

Codes of Practice for the Prudent Use of Antimicrobials, both generally and for specific animal enterprise groups, have been developed nationally by the AVA with support from industry, States and Territories. They are updated periodically and address the issues relating to development of antimicrobial resistance. Unfortunately, only approximately 50% of veterinarians are members of the AVA and although members have access to these codes, they are not always read due to the large volume of printed material that confront professionals on a daily basis. Victoria supplements this information by periodically providing articles on important issues for publication in the AVA and Veterinary Practitioners Registration Board newsletters. The latter is generally more widely read by practitioners however both newsletters are only published quarterly.

Reference is also made to education under QA programs.

Further Research (JETACAR Recommendation 18)

Victoria supports the need for further research as outlined in this recommendation, particularly in areas of vaccine development and population dynamics of antibiotic resistance.

Communication (JETACAR Recommendations 19-20)

Well run QA programs and their governing bodies could provide excellent opportunity to provide up to date information to members.

Coordination of the Resistance Management Program (JETACAR Recommendation 21-22)

At present, there is no system in place for reporting detection of antimicrobial resistance detected by laboratories to the APVMA. It would be beneficial to develop a system to address this issue.

Other matters

Companion Animals

Currently, there is no limitation on the use of antimicrobial products in companion animals. While these are used as treatments for individual animals, they are often for prolonged periods and there is a very close association between the animal and its owner. There is increasing evidence that resistant bacteria can be passed to people handling companion animals. There would appear to be significant opportunity to pass on resistance to drugs used in companion animals to humans. If humans carrying these resistant bacteria are hospitalised, the opportunity for multiplication of resistant bacteria is increased.

Expert Advisory Group on Antimicrobial Resistance

Following the JETACAR report, an Expert Advisory Group on Antibiotic Resistance (EAGAR) was established under the National Health and Medical Research Council (NHMRC) which among other activities was supposed to assist with keeping momentum on the implementation of the JETACAR recommendations. It also reviewed antimicrobial applications for the APVMA and other health agencies. It had an expert veterinary committee member but unfortunately the Department of Health showed a particular disinterest and any recommendations from JETACAR requiring financial input, did not progress, regardless of potential repercussions. EAGAR was discontinued following an industry appeal to the Administrative Appeals Tribunal over the use of virginiamycin for production purposes, at which time NHMRC were not prepared to support the APVMA. A new health advisory committee was established with a solitary veterinary member, however, the committee was not permitted to provide advice to APVMA on the health implications of antimicrobials. This committee was disbanded after three years and the current committee, now under the Department of Health rather than NHMRC, is made up solely of medical members.

It is recommended that the group includes a veterinary representative to assist with the management of advice on antimicrobials use in food production animals that may impact adversely on human health and also provide expert advice and support to the APVMA.