

**SUMMARY OF SUBMISSIONS ON THE DOCUMENT:  
 ANTIBIOTIC RESISTANCE STEERING GROUP REPORT (incorporating the report  
 “Antibiotic Resistance and In-Feed Use of Antibiotics in New Zealand”)**

Six submissions were received on this document. These submissions were presented to the Animal Remedies Board at the meeting of 15 December 1999. The submissions were noted and the Board confirmed its prudent action to review all antibiotic products by January 2001 and modify licences where uses may jeopardise public health. Products containing antibiotics of confirmed human health importance will be reviewed first and appropriate action will be taken by July 2000.

1	The Animal Remedies Board and Ministry of Agriculture and Forestry were generally commended on the development of a policy to cover this issue.
	<i>Both organisations believe that this issue warrants investigation and development of policy and standards.</i>
2	Concern was expressed in one submission about the lack of consultation during the writing of the review.
	<i>The members of the Steering Group were asked to consult with their constituents once there was a report on which to consult. They incorporated the comments of their constituents in the Steering Group report that prefaces the Expert Panel Report.</i>
3	Several submissions called for a ban on the practice of feeding antibiotics for use for growth promotion and were concerned that the Board had not acted immediately to do so. One submission suggested that the Board’s failure to take any action on this recommendation suggested that it was putting commercial considerations and the concerns of producers ahead of public health and consumer concerns. This submission quoted extensively from a British report on “Microbial Antibiotic Resistance in Relation to Food Safety” to support the case that the use in animals of antibiotics that closely resemble those used in human medicine causes increased resistance in humans.
	<i>The Board recognises that the reassessment of existing products has a high priority and this process is underway with the suspension of the in-water fluoroquinolone product mentioned in the report. A timetable of the review and rationale behind the details of it were noted by the Board at the 15 December 1999 meeting and work continues on the standard for review. Where antibiotic use may jeopardise public health, the Board will modify licence conditions. The Board must also consider the animal welfare consequences of withdrawal of therapeutic and prophylactic products for animals. The process of review is required before withdrawal can occur.</i>

4	<p>Some submissions stated that antibiotic use should be reserved for animal welfare purposes. Several submissions questioned the need for prophylactic use and stated that prophylaxis and treatment should be controlled to ensure that users cannot continue to use the product in the same way as growth promotion but under a different guise. One submission supported the promotion of healthy farming practices and education of producers on how to achieve optimum animal health without the use of antibiotic growth promotants or prophylactics. Others recognised that the common goal should be for prudent prescribing of antimicrobials and minimising the risk of antimicrobial resistance occurring. One submission made the point that there is no need for a code of practice to “promote” antibiotics, but rather a code of practice that promotes animals production systems which obviate the need for growth promotants.</p>
	<p><i>The Board is aware of the concern that growth promotion use may continue under the guise of prophylaxis. Any licensee whose product makes a claim for prophylaxis or treatment must provide supporting data for that claim. The product will then be subject to the normal compliance program to which all animal remedies are subject. It should be noted that the code of practice referred to in the Expert Panel report is a code of practice to promote prudent use of antibiotics.</i></p>
5	<p>One submission stated that antibiotics should not be available without veterinary prescription.</p>
	<p><i>This option is one of those available to the Board to control use of animal remedies. It is highly likely that this option will be extensively used where it is supportable. Regulatory control without technical justification could result in Commerce Commission concern regarding restrictive practices.</i></p>
6	<p>One submission brought up the point that domestic products and imported products must be treated equally. To do otherwise would make a mockery of any standards.</p>
	<p><i>The Expert Panel also made this point. As noted in the Steering Group’s report, New Zealand’s obligations under the World Trade Organisation’s principles for applying sanitary and zoosanitary measures mean that technically supportable arguments as to why the action is essential for public health and food safety must be provided.</i></p>
7	<p>Several submissions supported the setting up of a joint Ministerial committee and introduction of surveillance and analysis of antibiotic use. One submission believed that it is essential that there is consumer representation on the joint committee.</p>
	<p><i>The recommendation for the terms of reference of the joint Ministerial committee are being set out in conjunction with the Ministry of Health at present. The recommendations on the membership of that committee and any representation on it have not yet been discussed. The final decision will be a government one.</i></p>

8	<p>One submission requested that, if antibiotic growth promotion use was to continue, that produce be labelled as having been produced in that manner so that the consumer can make an informed choice to purchase or avoid.</p>
	<p><i>The Board notes this proposal. This and other matters will be clarified in the joint MAF-Ministry of Health committee.</i></p>
9	<p>Opinion was divided on the need for a comprehensive risk assessment of this problem. One submission stated that the problem had been proven by the British report on “Microbial Antibiotic Resistance in Relation to Food Safety” so a risk assessment was not required. Another stated that in the absence of resistance data, it is difficult to make clear decisions without performing risk assessments. However, a prudent approach should be taken while data is being collected to ensure that the future value of antimicrobials is not lost.</p>
	<p><i>A prudent approach will be taken while further data is collected.</i></p>
10	<p>Support was given to many of the Board policies, Steering Group recommendations and Expert Panel recommendations. Concern was expressed in some submissions that no reference had been made in the policy decisions of the Board to:</p> <ul style="list-style-type: none"> <li>• Surveillance of sale and use of antibiotics</li> <li>• Quarantine procedures</li> <li>• Peripheral issues.</li> <li>• Regular review of the registration of products.</li> </ul>
	<p><i>The registration of antibiotic products will be reviewed regularly to keep them up to date with current standards. The other matters will be clarified in the joint MAF-Ministry of Health committee.</i></p>
11	<p>Some submissions made reference to the need for wide consultation in the process of dealing with this problem, so that confidence can be placed in the protection offered by codes and standards set up. It was stated that guidelines set up by industry for industry will be viewed with suspicion by consumer groups.</p>
	<p><i>The review process will be set up by the Animal Remedies Board in association with industry and other interested parties and will be available for public comment.</i></p>