

Draft Minutes of the Sixteenth meeting of iNAP Animal Health Implementation Committee

Friday 6th May 2022 (11.00 – 13.00)

Webex video conference hosted by Department of Agriculture, Food and the Marine

1. Approval of minutes from the last meeting

Minutes of the last (fifteenth) meeting were circulated before this meeting.

Minutes were approved and will be published on the DAFM website (AP1).

2.Revised Terms of Reference – for approval

The revised Terms of Reference (ToR) of iNAP AHIC were circulated to the group ahead of the meeting for review. The revised ToR were approved at the meeting and will be published on the DAFM webpage (AP2).

3.iNAP Animal Health Implementation Plan – DAFM update

An updated document outlining stakeholder progress on all projects that have commenced will be circulated after the meeting (AP3). DAFM presented progress updates received to date and welcomed Nola Leonard, UCD to the iNAP Animal Health Committee. DAFM informed the group that Alice McGlynn has left Bord Bia and will be replaced on the INAP AHIC by Emma O’Gorman who was welcomed to the group. Members joined with DAFM in acknowledging Alice’s dedication, hard work and collaboration under iNAP.

Strategic Objective 1: 23 actions, 21 in progress.

Project 1 - VCI have commissioned a webinar promoting awareness of AMR, which will issue to all VCI registrants, vets and veterinary nurses in April 2022, carrying complimentary CVE credits.

DAFM thanked the farming organisations on the Committee for taking on actions to increase knowledge and awareness of AMR among farmers and will follow up with each organisation separately to discuss what additional actions will be taken (AP4).

Strategic Objective 2: 11 actions, 9 are in progress.

Project 27 – UCD advised the group that detailed therapeutic guidelines across a number of species (farm/companion animals) are being finalised. These seek to optimise treatment of the animals under the care of UCDVH and to ensure residents, interns and undergraduate students receive the best possible training in antimicrobial stewardship. UCD Veterinary School / Veterinary Hospital will share the guidelines more generally with the profession. It is hoped that the guidelines will be completed by June 22. These guidelines will mirror equine treatment guidelines which have also been drafted. DAFM added that a subgroup on pig therapeutics was initiated to align with commencement of work on pig AST panels. This subgroup is currently developing terms of reference.

Project 28 – The Department of Health is in a position to award the tender to a suitably qualified candidate to complete the One Health Report, which will progress in May 2022.

Project 34 - DAFM informed the group that a new soil sampling project has been added to the action plan. Part of this project involves screening for ESBL *E. coli*. Results obtained to date show a very low prevalence of ESBL *E. coli* in soils sampled.

Project 30 - AHI updated the group that the 2021 sales data for intramammary products has been analysed and details will be shared with the group in due course (AP5). Findings show an increase in absolute sales of dry cow tubes from 2020 (3.68 million versus 2.99 million), but a decrease in in-lactation tubes (1.63 million versus 1.86 million). This represented a continued low level of in-lactation usage on a DCDvet/cow basis (0.40 versus 0.44 in 2020), and relatively stable sales of dry cow tubes relative to 2020 (DCDvet/cow 1.13 in both years), taking the numbers of cattle into account. For in lactation tubes, the proportion sold containing one or more HPCIA's in 2021 was lower than in 2020 (10% and 13%, respectively) with the same trend evident for dry cow tubes (11% and 8%, respectively).

Strategic Objective 3: 10 actions, 1 is completed, 9 in progress. AHI updated.

Project 35 - Of 252 units assessed to date, 132 units have done two biosecurity assessments. There was an overall improvement in biosecurity scores between visits, mainly due to improvement in internal biosecurity (average of 72% for initial visits and 74% for recent visits). An annual biosecurity assessment is now required as part of the Bord Bia Pig Quality Assurance Standard and is expected to encourage increased uptake. Work is ongoing to develop a TASAH action to support farm Salmonella Control Plans, which is expected to start in June/July 2022.

Project 36 - Enhanced measures introduced to the BVD eradication programme in 2021 are showing good results, with the prevalence of calves born PI in 2022 at half the level seen in 2021.

Project 38 - The data processing agreement is now in place between DAFM and ICBF enabling transfer of IBR bulk tank serology results. AHI acknowledged the work of DAFM and ICOS in getting these DPAs in place. Communications will be targeted at herds which are bulk tank positive. AHI highlighted the importance of vaccination in IBR control, noting a year-on-year increase in sales of IBR vaccines - exceeding 3.1 million doses annually, an increase of more than 42% over the preceding 5 years.

Project 39 – Pig AM data is now being shared with PigHealthCheck dashboards. Initial results obtained through the BeefHealthCheck programme indicate that age at slaughter for steers and heifers is increased by 34 days, 12 days and 7 days, respectively, where evidence of liver fluke, pneumonia and liver abscesses are recorded at postmortem inspection, reflecting reduced productivity.

Project 40 - Promotion of the Johnes control programme continues, and advancing the programme is an action within the Climate Action Plan 2021. Communications are targeted at herds with positive bulk tank results encouraging them to register for the programme.

Project 41 – Cellcheck data showed that in 2021 approximately one third of herds had suboptimal mastitis control with a bulk tank SCC >200,000 cells/ml. At national level, milk quality deteriorated slightly in 2021: 67% of the national milk pool had an SCC <200K, compared to 68% in 2020. Overall, the slippage in national SCC performance in the first months of recent years has ceased. The proportion of herds (50%) and cows (68%) that were milk recorded in 2021 increased from 44% and

57% respectively, relative to 2020. AHI informed the group that an in-lactation TASA is being developed and will be piloted with herds and service providers in support of the development of a team-based approach to mastitis control.

Project 43 - DAFM have approved a Salmonella TASA to implement farm-level control plans, including culture of environmental samples collected on farm. Participation in this TASA will be a requirement of the Bord Bia QAS for pigs. Development of the PHC database to receive and present these results, and the herd's SCP is ongoing. AHI will deliver training to PVPs in the new TASA activity in Q2 of 2022

Strategic Objective 4: 11 actions, 2 complete and 9 in progress.

Project 50 – ZC updated the group that DAFM introduced Statutory Instrument S.I. No. 36 of 2022 EUROPEAN UNION (VETERINARY MEDICINAL PRODUCTS AND MEDICATED FEED) REGULATIONS 2022 in January 2022. This S.I. implements the requirements of EU Regulations 2019/4 & 2019/6. SI 36/2022 to be circulated to the group (AP6)

Project 53 - A project team comprising members from DAFM, DECC and EPA has been formed to advance this project. The next meeting is scheduled for 9th May. The IFA highlighted the importance of setting up a National Hazardous Waste Collection scheme for farmers and expressed disappointment that they have not been involved in recent discussions. The Chairman advised that IFA and other relevant stakeholders will be involved more as the NHWMP evolves.

Strategic Objective 5: 16 actions, 1 complete and 11 in progress.

Project 60 - AHI acknowledged the work of the Cellcheck TWG in developing Cellcheck dashboards which are now available through ICBF. Use of the dashboards will be explained as part of the training delivered to vets in association with the new in-lactation TASA to be piloted later this year.

4. Progress Update on iNAP2 Environmental sector projects- Jonathan Derham EPA

The EPA presented progress updates for a number of projects:

The following links of interest were shared by the EPA and will be circulated to the group after the meeting (AP7) **National Hazardous Waste Management Plan** <https://www.epa.ie/publications/circular-economy/resources/national-hazardous-waste-management-plan-2021---2027.php>

UN: **Environmental Dimensions of Antimicrobial Resistance – Summary for Policymakers** <https://www.unep.org/resources/report/summary-policymakers-environmental-dimensions-antimicrobial-resistance>

Project 22 - The National Hazardous Waste Management Plan 2021-2027 was published at the end of 2021. It includes specific actions for the Department of Health and DAFM (in consultation with the Department of Environment and Climate Change) in relation to human and animal healthcare wastes. Actions include:

- By 2024, establish nationwide collection and transfer of farm hazardous wastes, including unused veterinary products (Project 53 above refers).

- 3. By 2023, establish national collection of surplus / out-of-date medicines from household waste stream.

Project 32 - 2022 campaign for environmental monitoring in surface waters for AM residues under WFD watchlist has not begun yet and only one round of sampling is planned. Same locations and substances as per 2021. A review of the surface water monitoring WFD watchlist recommended that sampling of recreational waters be carried out all year round and not just in summer.

Project 33 - EPA 2022 research call just announced. It included for AMR-related proposals to address the research gap analysis published at the end of 2021. The value of the award(s) is €0.5M. DAFM have agreed to co-fund.

Project 62 - Knowledge needs gap analysis was published end of 2021. A link to the published report has been included in the progress update reports document.

The chair thanked EPA for sharing the very helpful papers which have been circulated to the group with the meeting papers of the INAP AHIC and acknowledged the central role played by the environment in the AMR cycle.

5.Code of good practice regarding the prudent use of antimicrobials in horses

Postponed until the next meeting since the UCD member was unable to attend today's meeting.

6.Implementing Act on restricting antimicrobials to human use – DAFM

Details of a recent EU Standing Committee meeting to discuss a draft Implementing Act (IA) designating antimicrobials or groups of antimicrobials reserved for treatment of certain infections in humans in line with Regulation EU 2019/6 were presented. The draft annex of the IA detailing the list of antimicrobials proposed to be reserved for the treatment of certain infections in humans is to be shared with the group (AP9). DAFM advised that the draft IA is out for public consultation until May 17th 2022. .

7.European Medicines Agency (EMA) reflection paper on prophylaxis – DAFM

The reflection paper on prophylactic use of antimicrobials in animals has been developed by the Committee for Veterinary Medicinal Products (CVMP). The paper will be reviewed and adopted by the CVMP at the end of the consultation period. The purpose of this paper is to establish an understanding of the term 'prophylaxis' as stated in the Regulation, where it is defined as *"the administration of a medicinal product to an animal or group of animals before clinical signs of a disease, in order to prevent the occurrence of disease or infection."* The paper also aims to develop high-level principles to guide the implementation of the restrictions on the prophylactic use of antimicrobial medicinal products in animals [Article 107(3)].

This draft reflection paper was previously circulated to the group while out for public consultation, and DAFM submitted comments in support of this paper ahead of the deadline of April 29th.

The paper reflects upon the approaches of blanket and selective dry cow therapy (lines 744 -757) and highlights the changes needed to current product market authorisations to reflect that a blanket approach is systematic, and therefore not consistent with the provisions of Article 107(3). The paper

also notes that the treatment of subclinical mastitis is considered as therapeutic treatment (lines 735-736). The paper goes on to say that the preventive aspect of dry cow therapy (DCT), however, needs to be considered as prophylaxis falling under the scope of Article 107(3), thus prophylactic DCT is only allowed in individual animals, if the risk of infection is very high and the consequences are likely to be severe (lines 737-739). The paper outlined that individual cow factors including age/teat abnormalities and history of previous infection could be taken into account when deciding whether or not to use DCT on that individual animal. Blanket DCT is not consistent with the requirements of Article 107(3).

DAFM advised that milk recording data is key tool in assisting decision-making on an individual animal level regarding whether or not an animal is suitable for selective dry cow therapy (SDCT) or needs an antibiotic at drying off. ICOS asked for clarification – could a cow's age be used as a justification for using DCT? SM stated that while age may be a risk factor for mastitis, it is not appropriate to decide to treat animals based on age alone, individual animal data is necessary to inform decision-making at drying off. SM highlighted the challenge for the Irish dairy industry in moving towards SDCT and stated that the most recently available sales data does not show a declining trend in sales of DCT. SM highlighted the concerns of herds with sub-optimal mastitis control in moving away from BDCT. ICMSA highlighted the challenges for farmers and vets in moving towards SDCT and noted that exclusion of provisions to incentivise milk recording under the CSP was a missed opportunity.

A question arose regarding how the prophylactic prescribing of AMs in line with Article 107(3) would be enforced. The VCI advised that the Code of Professional Conduct has recently been updated and is binding on all vets practicing in Ireland. Disciplinary action will be taken if vets are found to be prescribing outside the terms of the Code of Professional Conduct.

The Chair noted that this reflection paper will provide useful guidance for PVPs in their prescribing decisions. There is an opportunity over the next number of months to prepare for the necessary changes in approach to DCT and it is clear that further communication on the matter is necessary. HPRA advised that a revision of SPCs and product indications would be co-ordinated at EU level to ensure all authorised VMPs are consistent with Article 107(3) of the Regulation.

Reflection paper: [Reflection paper on prophylactic use of antimicrobials in animals in the context of Article 107.3 of Regulation \(EU\) 2019/6 \(europa.eu\)](#)

8. Antimicrobial Sales Reduction Targets - DAFM

DAFM highlighted to the group the importance of setting an ambitious, achievable national target to reduce antimicrobial sales nationally under the CAP Strategic Plan using the SMART methodology (Specific, Measurable, Attainable, Relevant, Time-bound). The European Commission's observation letter on Ireland's draft CAP Strategic Plan asked that Ireland identify its targets for reduced antimicrobial usage. Ireland's AM sales trend as reported by the HPRA were presented, and a 5% annual reduction target (a compound figure) on a reducing mg/PCU from 2020 to 2030 was suggested - this would reduce Ireland's AMU sales to 29mg/PCU by 2030 and would represent a 37% reduction from 2018 sales figure by 2030. DAFM highlighted that the greatest progress could potentially be made by seeking to reduce the amount of AM premixes and oral remedies being used in the intensive sectors; 37 tons of premixes were sold in 2020 (36% of the overall total sold). New Veterinary Medicines Regulations EU 2019/6 and Medicated Feed 2019/4 are particularly relevant in reducing the overall volume of AMs being used, in particular in areas of prophylactic use.

In the discussion that followed, the following points were made:

- A 5% reduction target in the time period allowed may not be ambitious enough, a higher target may be needed initially as progress in other countries has tended to plateau over time.
- There are many difficulties with using the mg/PCU metric for comparisons of AM sales between different countries.
- Specific sectoral targets may be needed rather than an overall target.
- Benchmarking and monitoring of AMU at the level of the prescriber/farm as well as assisting high users has been a powerful behavioural change motivator in countries such as Denmark.
- Concerns were expressed by the farming organisations regarding what targets for AMU reduction would mean for farmers on the ground and what would be the cost implications.
- It will take time for NVPS to capture and report enough prescriber level data to effect change.
- The increased uptake of vaccination will be key to reducing the need for AMs.
- Any early progress at reducing AMU in the pig industry could be stalled when Zinc Oxide becomes unavailable by 2024.

The Chair reminded the group that each sector was invited to set targets for AMU reduction when iNAP2 was launched and that this is still the objective. He clarified that Ireland must set visible targets for AMU reduction under the CAP Strategic Plan. The Chair acknowledged that mg/PCU is a crude measure but noted that this is the metric being used at an EU level. He also emphasised that AMs should only be used when necessary and that the emphasis should be on preventative strategies to reduce the need for AMs. The Chair also acknowledged the risk of setting targets in that they may not be achieved in the defined time period however an achievable target could be set, and it is a valid means of focusing attention on achieving the required objective.

The Chair asked that a note be circulated to Committee members for comment on the target proposed by DAFM for submission to the Commission under the CSP (AP 10). The HPRA highlighted the lag in collecting and analysing AM sales data and in obtaining and validating a PCU figure which will delay the measurement of annual progress. AHI advised the group that they have analysed 5 years of vaccine sales data and will present the results of this analysis in due course. (AP11)

9. AOB

The IFA raised the issue of VAT on vaccines and asked that this issue be progressed as a matter of urgency. An update on VAT on vaccines will be presented at the next meeting (AP 12) DAFM to circulate draft minutes of this meeting and advise Committee about next meeting date (AP 13).

Actions

<u>Action No.</u>	<u>Description</u>
1	DAFM will publish 15 th meeting minutes on DAFM website.
2	Revised Terms of Reference to be published on DAFM webpage.
3	DAFM to circulate updated iNAP progress report document with all updates following meeting.
4	DAFM to follow up with each farming organisation separately to discuss what additional actions will be taken under SO1 to increase knowledge and awareness of AMR among farmers under iNAP2.
5	AHI to share details of 2021 sales data analysis for intramammary products at a future meeting.
6	DAFM to circulate SI 36/2022 to the group
7	Links shared by EPA to NHWMP and UN: Environmental Dimensions of Antimicrobial Resistance – Summary for Policymakers to be circulated by DAFM
8	Code of good practice regarding the prudent use of antimicrobials in horses to be presented to the group at the next meeting
9	The draft annex of the IA detailing the list of antimicrobials proposed to be reserved for the treatment of certain infections in humans is to be shared with the group
10	A note will be circulated to Committee members for comment on the AMU sales reduction target proposed by DAFM for submission to the Commission under the CSP
11	AHI to present analysis of vaccine sales trends in recent years at a future meeting
12	An update on VAT on vaccines will be presented at the next meeting
13	DAFM to circulate draft minutes of this meeting and advise Committee about next meeting date.

Attendees

Chair - Dr Martin Blake - Chief Veterinary Officer (DAFM)

<u>Representative</u>	<u>Organisation</u>
David Graham (DG)	Animal Health Ireland
Emma O’Gorman (EoG)	Bord Bia
Jonathan Derham (JD)	Environmental Protection Agency
Lisa O’Connor (LOC)	Food Safety Authority of Ireland
Gavin Ryan (GR)	Health Products Regulatory Authority
Ray Doyle (RD)	Irish Cooperative Organisation Society
John Enright (JE)	Irish Creamery Milk Suppliers Association
Tomas Bourke (TB)	Irish Farmers Association
Cornelia O’Connell (COC)	Irish Grain and Feed Association
Edgar Garcia Manzanilla (EGM)	Teagasc
Nola Leonard (NL)	UCD
Linda Gordon (LG)	Safefood
Simon More (SM)	UCD/ CVERA
Niamh Muldoon (NM)	Veterinary Council of Ireland
Jane Pigott (JP)	Veterinary Ireland VICAS

Department of Agriculture, Food and the Marine

Martin Blake (MB)	Chief Veterinary Officer
Patricia Reilly (PR)	Deputy Chief Veterinary Officer
Paul Corkery (PC)	Senior Superintending Veterinary Inspector
Julie Bolton (JB)	Veterinary Inspector
Zara Conlon (ZC)	Veterinary Inspector
Rosemarie Slowey (RS)	Senior Research Officer
Amalia Naranjo Lucena (ANL)	Research Officer
Maire McElroy (MM)	Head of Division Bacteriology
John Moriarty (JM)	Head of Division Pathology

Apologies

<u>Representative</u>	<u>Organisation</u>
John Keogh	APHA
Vivienne Duggan	UCD
Conor Geraghty	Veterinary Ireland
Mike Lynch	ICBF
Neil Ruane	Marine Institute
Joe Ryan	Meat Industry Ireland
Caroline Garvan	DAFM