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2 EMA/CVMP/AWP/37203/2015
3 Committee for Medicinal Products for Veterinary Use (CVMP)

4 **Concept paper for the development of a reflection paper**
5 **on the use of extended-spectrum penicillins in animals in**
6 **the European Union: development of resistance and**
7 **impact on human and animal health**

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Comments should be provided using this [template](#). The completed comments form should be sent to vet-guidelines@ema.europa.eu

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Keywords	Extended-spectrum penicillins, animals, veterinary medicine, aminopenicillins, antimicrobial resistance.
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14 **1. Introduction**

15 As part of the European Commission (EC) Action plan against antimicrobial resistance (European
16 Commission, 2011), the EC requested advice from the European Medicines Agency (EMA) on the
17 impact of the use of antibiotics in animals on public and animal health and measures to manage the
18 possible risk to humans. Within this advice, it was noted that extended-spectrum penicillins with
19 activity against *Enterobacteriaceae* might have the ability to facilitate the spread of bacterial isolates
20 resistant to extended-spectrum beta-lactams, similarly to 3rd- and 4th-generation cephalosporins, and
21 therefore further risk profiling was recommended (EMA, 2014).

22 This concept paper will focus on authorised veterinary medicinal products containing extended-
23 spectrum penicillins¹ (aminopenicillins, including their combinations with beta-lactamase inhibitors)
24 which are currently classified as Category 2² by EMA/AMEG³, pending risk profiling before a final
25 decision on the category. Aspects regarding the use of these substances in veterinary medicine and
26 their potential public health risks are discussed.

27 **2. Problem statement**

28 Bacterial resistance to extended-spectrum beta-lactams has evolved rapidly in recent years especially
29 in *Enterobacteriaceae* (Liebana et al., 2013). These bacteria carry beta-lactamases (such as ESBL-,
30 AmpC cephalosporinases or carbapenemases) capable of hydrolysing many critically important
31 beta-lactam antimicrobials. Bacterial isolates resistant to extended-spectrum beta-lactams are also
32 often resistant to several other antimicrobial classes, limiting the treatment options. Similar resistance
33 development has been observed in several human and animal pathogens (Abraham et al., 2014;
34 ECDC/EMA, 2009; Seiffert et al., 2013). Resistant bacteria and their resistance determinants can be
35 transferred between animals and humans (EMA/CVMP, 2015). These bacteria often colonise food
36 animal species and the same bacteria are also found in food of animal origin, although the occurrence
37 in food is usually lower than in animals (Doyle, 2015; Economou and Gousia, 2015). This has raised a
38 concern that veterinary use of antimicrobials may present a public health risk to humans. Decrease in
39 the use of antimicrobials in animal production in the EU as well as promotion of responsible use of
40 antimicrobials has a high priority (European Commission, 2011).

41 The veterinary use of 3rd- and 4th-generation cephalosporins is linked to emergence of resistance to
42 extended-spectrum beta-lactams in food animal species. It has been assessed by the EMA that
43 veterinary use of these substances may present a risk for public health similarly to fluoroquinolones
44 (EMA, 2014). These agents were classified as Category 2 antimicrobials by the EMA (EMA, 2014).
45 Category 2 agents are considered critically important antimicrobials (CIAs) for which the risk to public
46 health from veterinary use is only considered acceptable provided that specific restrictions are applied.
47 These antimicrobials should be used only when there are no alternative antimicrobials authorized for
48 the respective target animal species and indication.

49 Extended spectrum penicillins, especially those with beta-lactamase inhibitors, have a spectrum of
50 activity similar to 2nd- and 3rd-generation cephalosporins. Extended-spectrum penicillins include
51 1) aminobenzylpenicillins (later: aminopenicillins), 2) amidopenicillins, 3) carboxypenicillins,
52 4) ureidopenicillins, and 5) beta-lactamase resistant penicillins. Extended-spectrum penicillins are often
53 combined with beta-lactamase inhibitors (such as clavulanic acid) to enhance their activity against

¹ In this paper extended spectrum penicillins refer to amoxicillin and ampicillin which are included within the ATCvet code QJ01CA, classified as extended spectrum penicillins. According to the ATCvet classification, combinations of penicillins, including beta-lactamase inhibitors, are included under the code QJ01CR.

² Antimicrobials used in veterinary medicine where the risk for public health is currently estimated as higher

³ AMEG: Antimicrobial Advice ad hoc Expert Group

54 beta-lactamase producing bacteria. Depending on the substance, their spectrum covers
55 *Enterobacteriaceae*, or even *Pseudomonaceae* (Giguère et al., 2013). Group 1 substances (ampicillin,
56 amoxicillin, and their combinations with clavulanic acid) are authorised in veterinary medicine and
57 have been widely used for decades for the treatment and prevention of infections in many food and
58 companion animal species. Substances belonging to other groups have marketing authorisations only
59 for humans. The use of these substances is limited to individual companion animals as off-label use
60 and is thus beyond the scope of this document.

61 Veterinary authorised extended-spectrum aminopenicillins and their combinations with beta-lactamase
62 inhibitors are classified as Category 2⁴ by EMA/AMEG pending a final decision on the category.
63 Veterinary use of aminopenicillins might have the ability to facilitate the spread of antimicrobial
64 resistance similarly to 3rd- and 4th-generation cephalosporins, and therefore further risk profiling is
65 needed (EMA, 2014).

66 3. Discussion

67 It is evident after seven decades of antimicrobial use, that the use of antimicrobials is a cause of
68 antimicrobial resistance. Many studies have reasserted the link between use and resistance: the higher
69 the use and thus the selection pressure – the higher the resistance (ECDC/EFSA/EMA, 2015;
70 ECDC/EFSA/EMA/SCENIHR, 2009). Aminopenicillins are widely used both in animals and humans.
71 Penicillins were the second largest antimicrobial class used in food animal species, including horses, in
72 the EU in 2012 (EMA/ESVAC, 2014). Extended-spectrum penicillins contributed a remarkable
73 proportion of total penicillin use, although there is wide variation between the member states. In food
74 producing animal species, the treatment indications of aminopenicillins include respiratory infections,
75 mastitis, metritis, and enteric infections in major livestock animal species (pigs, cattle and poultry).
76 Aminopenicillin formulations include oral powder and solution, and injectables either alone or in
77 combination with other antimicrobial classes. Aminopenicillins with or without beta-lactamase inhibitors
78 are also widely used for the treatment of dogs and cats (Rantala et al., 2004; Thomson et al., 2009)
79 and to lesser extent in horses (Dallap Schaer et al., 2012; Dunkel and Johns, 2015).

80 Due to decades of widespread use of aminopenicillins, resistance to these substances is very frequent
81 in zoonotic and indicator bacteria from humans, animals and food of animal origin (EFSA/ECDC, 2014)
82 as well as in animal pathogens (Nedbalcova et al., 2014; Swedres-Svarm, 2013) and the nature of this
83 resistance has developed in recent years. Resistance in these bacteria to 3rd-generation
84 cephalosporins is still at a low level, although evidence indicates an increase in resistance (EFSA/ECDC,
85 2014). Several studies have reported high occurrence of 3rd-generation cephalosporin resistance
86 among *Enterobacteriaceae* of livestock and food from livestock origin (Doyle, 2015; Economou and
87 Gousia, 2015). Verkade and Kluytmans (2014) report about emerging methicillin resistant
88 *Staphylococcus aureus* (MRSA) especially in pigs, which has raised concerns about antimicrobial use in
89 animals and its potential consequences to human health. Resistance determinants coding resistance to
90 aminopenicillins and cephalosporins are often located in transmissible gene elements to which different
91 types of resistance genes cluster (Jackson et al., 2015). Therefore the use of aminopenicillins may also
92 select resistance to other antimicrobial classes in addition to beta-lactams. Likewise, the use of other
93 antimicrobial classes may select co-resistance to extended-spectrum penicillins.

94 Despite a high occurrence of aminopenicillin resistance, aminopenicillins remain important agents in
95 veterinary medicine. They are still effective against streptococci and many respiratory pathogens such
96 as *Pasteurellaceae*. In companion animal species these drugs are important in treating bite wound
97 infections, urinary tract infections and respiratory infections. Ensuring the availability of these

⁴ Antimicrobials used in veterinary medicines where the risk for public health is currently estimated as higher

98 important drugs in veterinary medicine may also decrease the need to use other agents in animal
99 husbandry. When combined with clavulanic acid, these substances can be used for treating infections
100 caused by *Enterobacteriaceae* provided that a pathogen is susceptible to the drug, and that sufficient
101 dosages are used, since MICs (minimal inhibitory concentrations) of the wild type *Enterobacteriaceae*
102 for aminopenicillins are relatively high (Giguère et al., 2013). The importance of proper diagnosis and
103 bacteriological culture, and excluding other infectious agents, cannot be overemphasised since the use
104 of inefficient drugs or too low dosages may further select resistant isolates.

105 To conclude, aminopenicillins are widely used drugs and resistance to them is common both in humans
106 and in animals. Regardless of this, their use still offers many benefits. Aminopenicillins have a wide
107 margin of safety and many important pathogens are still susceptible to these drugs. For many
108 conditions aminopenicillins can be considered as a primary treatment option in many animal species.
109 However, because these agents are also listed as CIAs for humans and the AMEG advice, further risk
110 profiling is needed to decide if these are to be regarded in the same way as 3rd- and 4th-generation
111 cephalosporins (EMA, 2014).

112 **4. Recommendation**

113 The CVMP recommends drafting a reflection paper to decide if veterinary authorised aminopenicillins,
114 including their beta-lactamase inhibitor combinations, are to be included in Category 2, i.e. regarded in
115 the same way as 3rd- and 4th-generation cephalosporins and fluoroquinolones with restrictions placed
116 on their use.

117 The reflection paper should critically review recent information on use of those substances in food
118 producing and companion animals in the EU, their effect on development of resistance to these
119 substances in bacterial species that are of importance for human and animal health, and the potential
120 impact on animal and human health.

121 The reflection paper should include information on:

- 122 • Their use in veterinary medicine;
- 123 • Their use in human medicine;
- 124 • Mechanisms and spread of resistance in relevant bacteria;
- 125 • Occurrence of resistance in bacteria from food producing and companion animals;
- 126 • Possible links between the use of these substances in animals and resistance in bacteria of animal
127 origin;
- 128 • Impact on animal health;
- 129 • Impact on human health.

130 **5. Proposed timetable**

131 The end of consultation of the concept paper is 31 October 2015; the reflection paper is expected to be
132 released for consultation by the second quarter of 2016.

133 **6. Resource requirements for preparation**

134 The development of the reflection paper will require the appointment of one Antimicrobials Working
135 Party (AWP) rapporteur, and physical and virtual meetings of the AWP rapporteur and experts.

136 7. Impact assessment (anticipated)

137 The reflection paper will provide information on the development of antimicrobial resistance to these
138 substances and provide further clarification on the need and priority of risk management measures. In
139 addition, the reflection paper may detect gaps in our knowledge and identify subjects for further
140 research.

141 8. Interested parties

142 Veterinarians, veterinary pharmaceutical industry, human healthcare professionals, public health
143 professionals, farmers, consumers and regulators.

144 9. References to literature, guidelines, etc.

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