

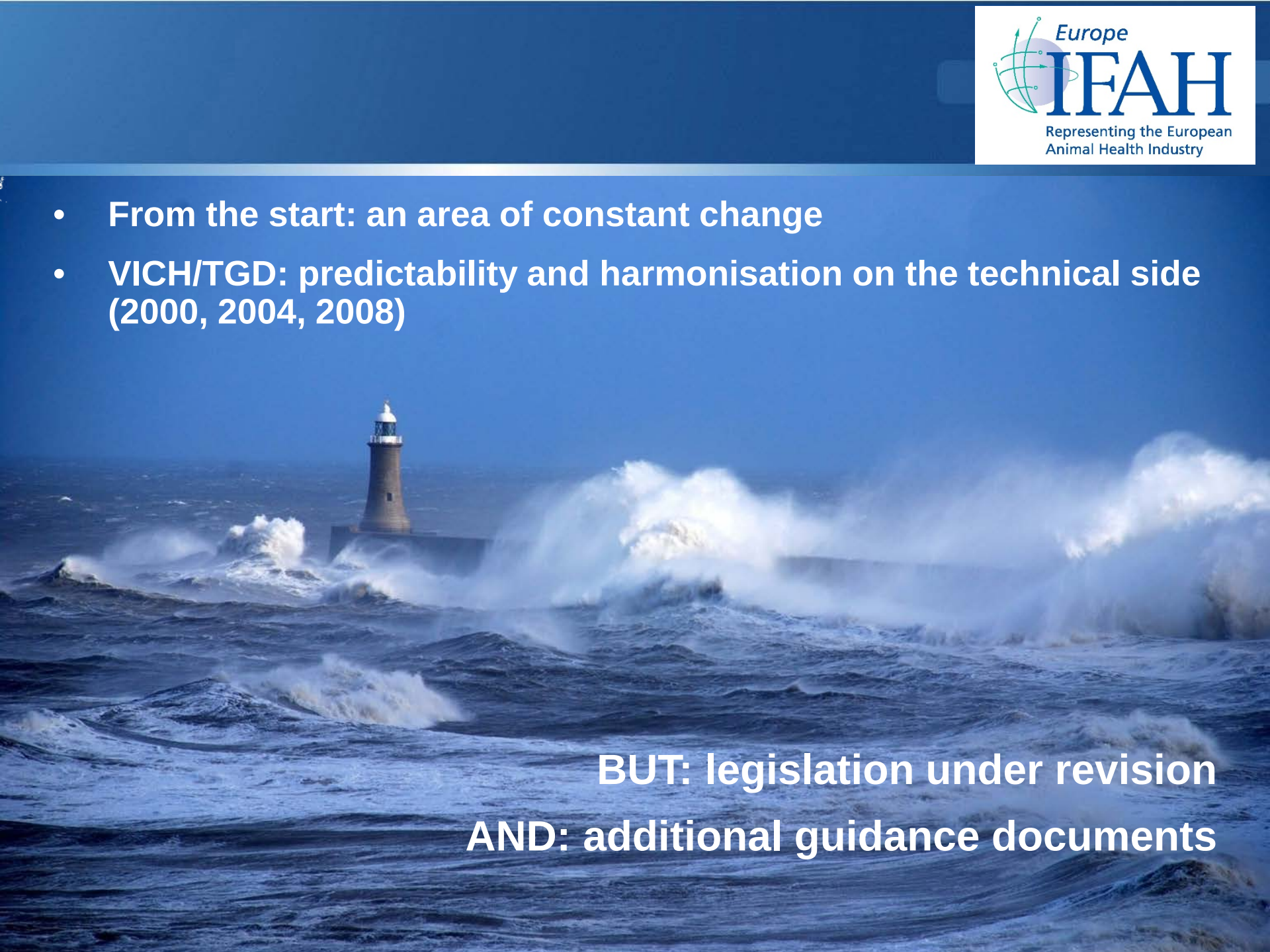
Environmental Risk Assessment

Recent developments

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Infoday 16 March 2017

- From the start: an area of constant change
- VICH/TGD: predictability and harmonisation on the technical side (2000, 2004, 2008)



BUT: legislation under revision
AND: additional guidance documents

Recent developments:

- PBT-assessment
- Higher Tier dung fauna testing
- Legislative review – Proposals under discussion

Guideline in place, Reflection Paper under development

Current concepts

- Substance, not product
- Hazard-based
- Phasing-out
- Comparative assessment and substitution

These concepts have been captured in EP-amendments



Concerns

- Scope?
- Substance-based approvals prior to submission of MAA?
- Extra legislation?
- Need clinical trials to demonstrate therapeutic benefits ?
- Exposure not considered - Risk assessment not accepted?
- Hazard/benefit assessment?
- Criteria for product approval?
- What with substances shared with human medicine?

Consequences

- Uncertainties regarding existing products
- Decisions driven by hazard, not risk
- High hurdle for future (parasiticide) development for EU
 - Note: not all parasiticides are PBT
- Anthelmintic resistance?
- Animal health and welfare?



Dung fauna

Higher Tier testing (1)

- High need for a way forward
- Support for proposed tiered approach
- Tier A: (spiked) dung laboratory studies, EC_{50}
- Tier B: 2 studies mentioned, *NOEC*
 - “methodologies under development” – dung beetle only
 - no validation
- Focus of draft GL: field studies in Tier C, *duration of effects*
 - Very prescriptive, rigid protocol proposal
 - Need for multiple studies within Europe
 - Not following DOTTS* validation work intended for OECD
 - Scientific justification for 28 day decision point criteria?
 - Knocks out avermectins, pyrethroids,...

* Dung Organism Toxicity Testing Standardisation

Dung fauna

Higher Tier testing (2)

Recommendations

- Suggestion to keep guidance and study protocols separate
- Proposal to explore:
 - Development and validation of proposed Tier B studies (OECD)
 - Tier B dung flies? More sensitive than beetles
 - Additional studies with incurred residues in Tier A/B, *duration of effects*
 - If high and prolonged effects, then proceed with field study
 - Refinement and validation of proposed Tier C study (OECD) as recommended by the DOTTS group:

Floate et al (2016). Validation of a standard field test method in four countries to assess the toxicity of residues in dung of cattle treated with veterinary medicinal products. *Envir. Toxicol. Chem* 35 (8), 1934–1946

Tixier et al (2016). A four-country ring test of non-target effects of ivermectin residues on the function of coprophilous communities of arthropods in breaking down livestock dung. *Envir. Toxicol. Chem* 35 (8), 1953-1958.

Jochmann et al (2016). A field test of the effect of spiked ivermectin concentrations on the biodiversity of coprophagous dung insects in Switzerland. *Envir. Toxicol. Chem* 35 (8), 1947-1952.

Legislative review Proposals (1)

- **Generics (COM)**
 - ERA when reference VMP registered before 20 July 2000 or in case Phase II assessment required for the reference VMP
- **SPC-harmonisation (COM)**
 - ERA when registered before 20 July 2000 or reassessment if identified earlier as potentially harmful
- **Monographs (EP)**
 - Separate legislation - mechanism unclear
 - Required for all substances or just food-producing animals?
 - Only covers hazards = substance; exposure determines risk = product
- **Product database (COM, EP)**
 - Environmental data to be included

Legislative review Proposals (2)

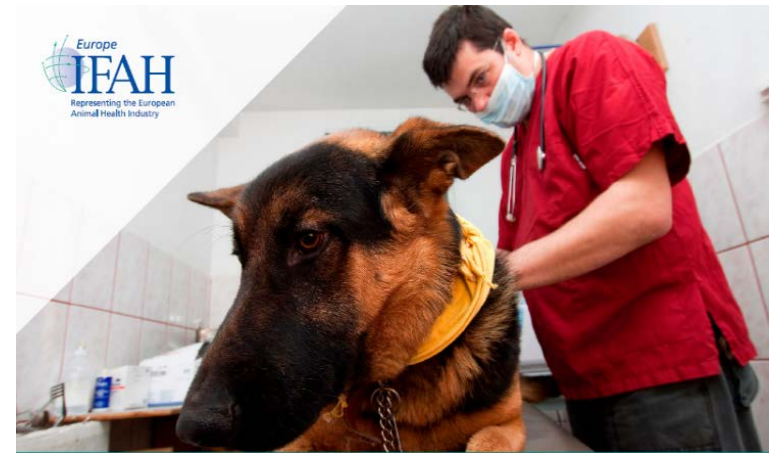
- **Refusal if: (EP)**
 - Substance of high concern
 - Persistent, bioaccumulative and toxic (PBT)
 - Endocrine disruptor
 - Higher risk compared to “standard reference treatment”
 - Comparative assessment and substitution
- **No protection of technical documentation (EP)**
 - “Safety information with regard to the environmental effects of veterinary medicinal products shall not be protected.”
- **Manufacturing (EP)**
 - Details on emissions, discharges, losses to be included in product dossier
 - Manufacturing authorisation refused if unacceptable risks
 - Risk for AMR during production and use

Consequences Legislation/Guidelines

- **Moving away from harmonised approach under VICH:**
 - PBT testing even if the assessment ends in Phase I
 - Dung fauna testing: EU vs other regions
- **Moving from risk assessment to decisions on a hazard**
 - Monographs: list of hazards – who owns them, who pays?
 - Substance-based approvals: based on the hazards, not risks
- **Impact on medicines availability?**
 - Lack of predictability – right now
 - Re-assessment of existing products: who pays?
 - Development of new products for food-producing animals: who dares?
 - Proportionality?

The way forward

- Maintain the existing product-based benefit-risk assessment, rather than a substance- and hazard-based approach
- Ensure environmental risk assessments to be proportionate and performed according to internationally validated and adopted standards
- Foster a healthy culture of dialogue and scientific information exchange



Thank you