



1 25 July 2017  
2 EMA/CVMP/AWP/721118/2014  
3 Committee for Medicinal Products for Veterinary Use (CVMP)

4 **Reflection paper on use of aminoglycosides in animals in**  
5 **the European Union: development of resistance and**  
6 **impact on human and animal health**  
7 **Draft**

Draft agreed by Antimicrobials Working Party (AWP)	24 May 2017
Adopted by CVMP for release for consultation	13 July 2017
Start of public consultation	25 July 2017
End of consultation (deadline for comments)	31 October 2017

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## 13 Executive summary

14 Aminoglycosides (AGs) are important antibacterial agents for the treatment of various infections in  
15 humans and animals, although they are seldom the sole treatment option. In veterinary medicine in  
16 the European Union (EU), AGs account for 3.5% of the total sales of antimicrobials. The most  
17 frequently used AGs are neomycin, dihydrostreptomycin and spectinomycin and approximately half of  
18 the total use is in oral forms. In human medicine AGs, especially gentamicin, tobramycin and amikacin,  
19 are used primarily in infections involving multidrug-resistant Gram-negative bacteria, such as  
20 *Pseudomonas*, *Acinetobacter*, and *Enterobacter* and they are mainly applied systemically. Following  
21 extensive use of AGs in humans, food-producing animals and companion animals, acquired resistance  
22 among human and animal pathogens and commensal bacteria has emerged. Acquired resistance  
23 occurs through several mechanisms, but enzymatic inactivation of AGs is the most common one.  
24 Resistance mechanisms differ between the AG molecules and between bacterial species. Cross-  
25 resistance to several AGs by a single mechanism/plasmid does occur, but generally there is no  
26 complete cross resistance to all AGs by one mechanism. Mechanisms conferring resistance to  
27 (dihydro)streptomycin and spectinomycin usually differ from those of the other AGs. AG resistance has  
28 been found in many different bacterial species, including those with zoonotic potential. Resistance to  
29 streptomycin and spectinomycin is generally high in veterinary pathogens, while resistance to  
30 gentamicin is still uncommon for most bacteria originating from animals. In *E. coli*, *Salmonella* and  
31 *Campylobacter* isolates from food-producing animals in EU member states (MS) resistance to  
32 gentamicin is scarce, whereas resistance to streptomycin in *E. coli* and in some MS also in *Salmonella*  
33 and *Campylobacter* isolates is common. In livestock-associated MRSA CC398, resistance to gentamicin  
34 is commonly found. There is evidence that the usage of AGs in human and veterinary medicine is  
35 associated with the increased prevalence of resistance. Resistance genes are often located on mobile  
36 elements facilitating their spread between different bacterial species and between animals and  
37 humans. The same resistance genes have been found in isolates from humans and animals. Evaluation  
38 of risk factors indicates that the probability of transmission of AG resistance from animals to humans  
39 through transfer of zoonotic or commensal food-borne bacteria and/or their mobile genetic elements  
40 can be regarded as high. For human medicine, gentamicin, tobramycin and amikacin are of greater  
41 importance than the other AGs. Resistance to gentamicin, tobramycin and amikacin is generally still  
42 scarce in veterinary organisms and use of these AGs in animals is more often through local  
43 administration or by injection. AGs are important in human medicine for the treatment of MDR  
44 tuberculosis, Gram-negative infections and enterococcal/streptococcal endocarditis and have been  
45 categorized by WHO as critically important for human medicine. AGs are, however, rarely the sole  
46 treatment option in either veterinary or human medicine.

47 Considering the AMEG criteria, veterinary-authorized AGs would be placed in Category 2 given (i) their  
48 importance in human medicine and (ii) the high potential for transmission of resistance determinants  
49 between animals and humans and the potential for co-selection of resistance as described by the  
50 AMEG. However, according to the CVMP, AGs have a lower risk profile compared to fluoroquinolones  
51 and 3<sup>rd</sup>- and 4<sup>th</sup>-generation cephalosporins as they are used for a lower absolute number of individuals  
52 affected by all diseases for which these antimicrobials are one of few therapies available, and they are  
53 used less often for other infections than 3<sup>rd</sup>- and 4<sup>th</sup>-generation cephalosporins and fluoroquinolones in  
54 human medicine (WHO). It is suggested that AMEG could give consideration to a further stratification  
55 of the categorization.

56

## 57 CVMP Recommendations for action

58 In April 2013, the European Commission (EC) requested advice from the European Medicines Agency  
59 (EMA) on the impact of the use of antibiotics in animals on public and animal health and measures to  
60 manage the possible risk to humans. The advice was provided by the Antimicrobial Advice ad hoc  
61 Expert Group (AMEG). As part of the advice, the AMEG provided a categorisation of antimicrobials  
62 according to their risk for public health. This CVMP/AWP reflection paper considers a recommendation  
63 from the AMEG for further risk profiling to be undertaken for the aminoglycosides (AGs) to enable them  
64 to be placed within the AMEG's categorisation.

65 In veterinary medicine AGs are used to treat a wide range of infections in all major food-producing  
66 animals and in companion animal species. In particular, they are important for treatment of post-  
67 weaning diarrhoea in pigs, for topical treatment of *Pseudomonas* spp. infections in companion animals  
68 and gentamicin is used for treatment of Gram-negative infections in horses. AGs are rarely the only  
69 treatment option for specific infections. AGs (in particular (dihydro)streptomycin and neomycin) are  
70 also used in combination with other antimicrobials, often beta-lactams, to achieve a synergistic effect  
71 or to broaden the spectrum of activity.

72 In 2014, AGs accounted for 3.5% of the total sales of veterinary antimicrobials in mg/PCU in 29 EU  
73 countries (EMA/ESVAC, 2016). The substances with the highest volume of use were neomycin,  
74 dihydrostreptomycin and spectinomycin.

75 AG resistance mechanisms are complex and differ between AG molecules and bacterial species. There  
76 is usually no complete cross-resistance between antimicrobials in this class, although there is evidence  
77 that use of apramycin in pigs may select for gentamicin-resistant *E. coli*. Amongst animal pathogens,  
78 high levels of resistance have been reported to various AGs in isolates of *Streptococcus suis* from pigs,  
79 and to streptomycin in *E. coli* from poultry, pigs and equids. In isolates from food-producing animals  
80 collected under mandatory EU surveillance of zoonotic and indicator bacteria (EFSA/ECDC, 2017),  
81 resistance to streptomycin was generally very common, whereas it was low for other tested AGs, with  
82 some variation between MSs and animal species. Resistance to various AGs has also been reported to  
83 occur commonly in LA-MRSA isolates from pigs, veal calves and poultry in the Netherlands (de Neeling  
84 et al., 2007; Wagenaar and Van de Giessen, 2009; Wendlandt et al., 2013b). Enterobacteriaceae, LA-  
85 MRSA and *Enterococci* spp. have potential for zoonotic transmission of genes encoding resistance to  
86 AGs and similar resistance genes and mobile elements have been found in bacteria from humans and  
87 animals. Based on the AMEG's criteria, the probability of transfer of AG resistance genes from animals  
88 to humans is estimated as high (Table 4).

89 AGs are classified by WHO as critically important antimicrobials (CIAs) in human medicine, although  
90 they are not included with the highest priority CIAs. In acute care in human medicine, the most used  
91 AGs were gentamicin, amikacin, tobramycin and netilmicin (Zarb, 2012). Due to the increase in  
92 prevalence of MDR Gram-negative infections (Enterobacteriaceae, *Pseudomonas* spp. and  
93 *Acinetobacter* spp.) there is renewed interest in AGs in human medicine and they were identified by  
94 the AMEG as critically important in the EU to treat these infections and enterococcal endocarditis, in  
95 addition.

### 96 Recommendations

#### 97 *Proposal on categorisation for consideration by AMEG*

- 98 • Considering the AMEG criteria, veterinary-authorised AGs would be placed in Category 2 given (i)  
99 their importance in human medicine and (ii) the high potential for transmission of resistance

100 determinants between animals and humans and the potential for co-selection of resistance as  
101 described by the AMEG. However, according to the CVMP, AGs have a lower risk profile compared  
102 to fluoroquinolones and 3<sup>rd</sup>- and 4<sup>th</sup>-generation cephalosporins as they are used for a lower  
103 absolute number of individuals affected by all diseases for which these antimicrobials are one of  
104 few therapies available, and they are used less often for other infections than 3<sup>rd</sup>- and 4<sup>th</sup>-  
105 generation cephalosporins and fluoroquinolones in human medicine (WHO). Without precluding the  
106 AMEG decision, it is recommended that veterinary-authorized AGs could be placed in Category 2,  
107 although the AMEG could give consideration to a further stratification of the categorization.

- 108 • Those AGs that are not authorised for use in veterinary medicine would remain in the AMEG's  
109 category 3, pending risk assessment.

110

#### 111 *Considerations for Marketing Authorisations and SPCs*

- 112 • The rationale for the indications for some VMPs containing fixed combinations of AGs, or  
113 combinations with antimicrobials from other classes, is questionable. In particular, this is the case  
114 for combinations including (dihydro)streptomycin as there is widespread resistance to this molecule  
115 in many bacterial species. The indications for (dihydro)streptomycin mono- products and AG  
116 combinations should be reviewed.
- 117 • The need for prolonged treatment durations (beyond 7 days) for certain products administered  
118 orally to groups of animals should be reviewed in the context of the specific indications.
- 119 • In reference to the above two recommendations and the scope of any referral procedures, review  
120 of groups of products would be prioritised according to risk.
- 121 • Based on the high levels of resistance to (dihydro)streptomycin and spectinomycin in many animal  
122 isolates, it should be recommended that use of these substances in particular is based on  
123 susceptibility testing.

124 Responsible parties: CVMP, Regulatory Agencies, Marketing Authorisation Holders (MAHs)

125

#### 126 *Needs for research*

- 127 • Further research should be conducted into the PK/PD surrogate indices which are predictive of  
128 clinical efficacy and enable optimisation of dosing regimens for AGs that are administered  
129 parenterally.
- 130 • Susceptibility testing should be standardised and veterinary clinical breakpoints should be  
131 established for AGs to enable the proper interpretation of susceptibility tests.
- 132 • The same AG resistance genes have been found in isolates from animals and humans and the  
133 potential for transmission of resistance from animal to humans is regarded as high. Further  
134 research is needed to elaborate on the link between the use of AGs in animals and the impact on  
135 public health.

136 Responsible parties: EURL-AMR, EFSA, VetCAST

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## 158 1. Background

159 Aminoglycosides (AGs), introduced in 1944, are among the oldest classes of antimicrobials. AGs have  
160 an aminocyclitol nucleus linked to amino sugars through glycosidic bonds (Ramirez and Tolmasky,  
161 2010). The first AG discovered was streptomycin, produced by *Streptomyces griseus* (Schatz and  
162 Waksman, 1944). Several years later, other AGs produced by *Streptomyces* spp. were found  
163 (kanamycin, spectinomycin, tobramycin, neomycin, apramycin). In 1966, gentamicin, produced by  
164 *Micromonospora purpura*, was discovered followed by sisomicin produced by *M. inyoensis*. The first  
165 semisynthetic molecules were developed in the 1970s e.g. amikacin, netilmicin, isepamicin, dibekacin  
166 and arbekacin (van Hoek et al., 2011). AGs that are derived from *Streptomyces* spp. are named with  
167 the suffix –mycin (e.g. streptomycin), whereas those derived from *Micromonospora* spp. are named  
168 with the suffix –micin (e.g. gentamicin). The AGs can be divided into 4 groups: derivatives containing  
169 the aminocyclitol streptidine (e.g. streptomycin, dihydrostreptomycin); derivatives containing the  
170 aminocyclitol streptamine (spectinomycin), derivatives containing a 4,5-disubstituted deoxystreptamine  
171 moiety (neomycin) and derivatives containing a 4,6-disubstituted deoxystreptamine moiety (gentamicin,  
172 kanamycin, amikacin, tobramycin). The aminocyclitol spectinomycin is closely related to the  
173 aminoglycosides and will be discussed together with the AGs in this reflection paper.

174 AGs are bactericidal antibiotics that act by impairing bacterial protein synthesis through binding to the  
175 30S ribosomal subunit (Dowling, 2013). AGs must penetrate into the bacterium to assert their effect  
176 and the uptake of AGs in the bacterial cell is an oxygen dependent process. Therefore, the spectrum of  
177 action of AGs is limited to aerobic and facultative anaerobic bacteria under aerobic conditions. AGs are  
178 less potent in hyperosmolar environments or environments with low pH. In addition, purulent debris at  
179 the infection site can bind to AGs and inactivate them (Dowling, 2013). AGs are hydrophilic molecules  
180 and relatively insoluble in lipids. They are poorly absorbed from the gut and penetration of the blood  
181 brain barrier is minimal (Dowling, 2013; Nau et al., 2010). The spectrum of activity includes Gram-  
182 negative bacteria, staphylococci, mycobacteria and leptospira. They have poor efficacy against  
183 streptococci and anaerobic bacteria and bacteria with intracellular location (e.g. severe or invasive  
184 salmonellosis). Enterococci generally show a degree of intrinsic resistance to AGs due to  
185 impermeability of the cell wall. Penetration into the bacterial cell can be enhanced by drugs that  
186 interfere with cell wall synthesis like beta-lactam antibiotics. Therefore, AGs are often used in  
187 combination with beta-lactams. This combination also broadens the spectrum of activity (Dowling,  
188 2013).

189 In April 2013, the European Commission (EC) requested advice from the European Medicines Agency  
190 (EMA) on the impact of the use of antibiotics in animals on public and animal health and measures to  
191 manage the possible risk to humans. This reflection paper is based on the recommendation from the  
192 Antimicrobial Advice ad hoc Expert Group (AMEG) for further risk profiling of AGs to enable them to be  
193 placed within the AMEG's categorisation. The objective of the reflection paper is therefore to critically  
194 review the current knowledge on the usage of AGs, resistance development and the potential impact of  
195 this resistance on animal and human health.

196

## 197 2. The use of aminoglycosides in veterinary medicine

198 AGs are extensively used in veterinary medicine (EMA/ESVAC, 2016). They are used in different animal  
199 species, including both food producing animals and companion animals (Table 1). The substances  
200 reported to the ESVAC project as sold are amikacin, apramycin, (dihydro)streptomycin, framycetin,  
201 gentamicin, kanamycin, neomycin, spectinomycin and paromomycin. It must be noted that for  
202 amikacin no MRLs have been established and it can therefore not be used in food-producing animals.  
203 Paromomycin is approved in some Member States (MS) for treatment of colibacillosis in pigs and calves  
204 and has been used for the prevention of histomoniasis in turkeys (Kempf et al., 2013). Since 1976,  
205 AGs have not been authorised as growth promoters in the EU MSs. Before 1976, neomycin and  
206 hygromycin-B were authorised to be added to poultry feed for growth promotion only on a national  
207 level in certain MS (Castanon, 2007). In EU MS, AGs can therefore be employed only for clinical  
208 purposes. The most frequent use is therapy for septicemias, and infections of the digestive tract,  
209 respiratory tract and urinary tract in many animal species including cattle, pigs, poultry, sheep, goats,  
210 horses, dogs and cats. The use of the more toxic AGs such as neomycin is largely restricted to topical  
211 or oral therapy, while less toxic AGs such as gentamicin are also used for parenteral treatment. In  
212 addition, they are used off label as impregnated beads or regional perfusion to treat musculoskeletal  
213 infections in companion animals and horses. In particular gentamicin is indicated for *Pseudomonas*  
214 *aeruginosa* infections with few alternative treatments available (Dowling, 2013).

### 215 **Route of administration and dosing**

216 AGs are used for parenteral, oral and topical applications.

217 Substances used for **parenteral applications** are (dihydro)streptomycin, gentamicin, kanamycin,  
218 framycetin, spectinomycin and neomycin. They are applied for therapy of blood stream infections as  
219 well as for infections of the gastrointestinal, respiratory tract and urinary tract in many animal species.  
220 Because of the unfavorable resistance situation and the risk of potential adverse reactions the use of  
221 (dihydro)streptomycin as mono-preparation is not recommended. (Dihydro)streptomycin in  
222 combination with penicillins is available as suspensions for intramuscular (i.m.) and subcutaneous  
223 (s.c.) administrations in cattle, pigs, horses, cats and dogs. Dosing regimens are 10-25 mg/kg once  
224 daily for 3 to 5 days or twice, 48 hours apart. Kanamycin is used i.m., s.c. or intravenously (i.v.) in  
225 dogs, cats, cattle, sheep, pigs and horses at dosages of 5-10 mg/kg, 3 to 4 times daily over a period of  
226 3 to 4 days. Gentamicin is administered by i.m., s.c. or i.v. injection to dogs, cats, cattle, pigs and  
227 horses at dosages of 3-6.6 mg/kg over 3 to 5 (and in certain cases up to 10) consecutive days.  
228 Gentamicin is commonly administered twice daily on the first day and treatment is continued once  
229 daily from the second day onward. In young animals, the recommend dose is reduced by half.  
230 Framycetin is used in cattle at a dose of 5mg/kg i.m. twice daily for 3 days. Spectinomycin combined  
231 with lincomycin is administered i.m. to dogs, cats, horses, cattle and pigs at dosages of 10-20 mg/kg  
232 once or twice daily over 3 to 7 days. Spectinomycin is administered as mono-substance to calves at  
233 dosages of 20-30 mg/kg i.m. on 3-7 days. Neomycin in combination with penicillins is used i.m. in  
234 cattle, sheep, pigs, horses, dogs, cats at a dose of 5-10mg/kg for 3 days (Löscher et al., 2014;  
235 Veterinary Medicines Directorate, website, last accessed 2017b; Vetidata, 2016; VMRI, 2016).

236 The majority of **oral formulations** (oral solution, oral powder, premix) are used for treatments in  
237 pigs, calves, sheep (lambs), poultry and rabbits. They are administered in a once daily treatment  
238 regimen as oral drenches (neonates) or in feed or drinking water/ milk over a period of 3-5 (and in  
239 exceptional cases even 7) days. Individual products are authorized for considerably longer treatment  
240 durations e.g. apramycin for 21 days or up to 28 days. Twice daily dosing regimens are used for

241 products containing neomycin in combination with sulfadiazine or streptomycin. AG doses vary  
242 depending on the substance and the target animal species intended to treat. For neomycin the daily  
243 dose is 10-75 mg/kg, for apramycin 4-80 mg/kg, for paromomycin 25-50 mg/kg and for gentamicin  
244 1.1-3.4 mg/kg. In the context of a referral procedure under Article 35 of Directive 2001/82/EC  
245 (EMEA/V/R/A/110) and the subsequent commission decision, indications and posology of products  
246 containing a combination of spectinomycin and lincomycin to be administered orally to pigs and/or  
247 poultry were restricted to: pigs: 3.33 mg lincomycin and 6.67 mg spectinomycin/kg twice daily, for 7  
248 days for the treatment and metaphylaxis of porcine proliferative enteropathy (ileitis) caused by *L.*  
249 *intracellularis*, and associated enteric pathogens (*E. coli*). The dose for chickens is 16.65 mg lincomycin  
250 and 33.35 mg spectinomycin/kg twice daily for 7 days for the treatment and metaphylaxis of chronic  
251 respiratory disease (CRD) caused by *Mycoplasma gallisepticum* and *E. coli*, and associated with a low  
252 mortality rate.

253 **Local applications** include ear drops, eye drops, topical application to the skin and intramammary  
254 and intrauterine preparations.

### 255 **Animal species**

256 **Poultry:** In the EU neomycin, apramycin, spectinomycin and streptomycin are authorised for use in  
257 poultry (FIDIN, website, last accessed 2016; Norwegian Medicines Agency, 2003; Veterinary Medicines  
258 Directorate, website, last accessed 2017a). Outside the EU, gentamicin is used as subcutaneous  
259 injection in day-old chicks or in-ovo injections. In-ovo injection is a route for administration of Marek's  
260 disease vaccination in the U.S. and to prevent bacterial contamination of eggs, injection of gentamicin  
261 in combination with the vaccine is used (Bailey and Line, 2001). In-ovo injections or other applications  
262 of gentamicin in poultry are, however, not authorised in the EU as no MRLs for gentamicin for poultry  
263 exist. Neomycin and apramycin are authorised for oral treatment of enteric infections in poultry, e.g.  
264 for the treatment of *Escherichia coli* and Salmonella infections in young chickens, however  
265 antimicrobials are not permitted to be used for the specific purpose of control of Salmonella, with  
266 certain exceptions (Commission Regulation (EC) No. 1177/2006).

267 **Pigs:** In pigs, apramycin, gentamicin, paromomycin and neomycin are used for oral treatment of  
268 colibacillosis and salmonellosis (Norwegian Medicines Agency, 2012). Dihydrostreptomycin in  
269 combination with benzylpenicillin is authorised for respiratory infections caused by *Actinobacillus*  
270 *pleuropneumoniae* and/or *Pasteurella multocida* and for the treatment of Glässer's disease caused by  
271 *Haemophilus parasuis*.

272 **Cattle:** Neomycin, streptomycin, kanamycin and framycetin, in combination with other antimicrobial  
273 agents, are used in preparations for intra-mammary administrations to cows with mastitis. Neomycin  
274 and apramycin are used in calves for the treatment of bacterial enteritis caused by *E. coli* and  
275 Salmonellae. Gentamicin is used against respiratory infections of *Mannheimia haemolytica* and  
276 *Pasteurella multocida* in calves. Dihydrostreptomycin or streptomycin is used in the treatment of  
277 leptospirosis in cattle, swine and dogs. In non-ruminating calves paromomycin is used for the  
278 treatment of enteric infections caused by *E. coli*.

279 **Horses:** AGs (amikacin, neomycin and gentamicin) are mainly used for treatment of bacterial  
280 septicaemia, respiratory tract infection e.g. pneumonia, peritonitis, osteomyelitis, meningitis, wound  
281 infections, endometritis, often in combination with other antibiotics like beta-lactams. Topical  
282 application is recommended for infections of the eye and uterus. Amikacin is authorized in some MS for  
283 horses that are kept as companion animals and do not enter the food chain.

284 **Companion animals:** Injections of gentamicin or amikacin are licensed for the treatment of  
285 septicemia and respiratory infections. In textbooks AGs are recommended for the treatment of  
286 bacterial peritonitis, metritis, osteomyelitis, leptospirosis and nocardiosis (Dowling, 2013). AGs such as  
287 gentamicin, neomycin and framycetin are used as topical treatment for infections of the eye  
288 (blepharitis, conjunctivitis, keratoconjunctivitis, anterior uveitis), ear (otitis externa) and skin (FIDIN,  
289 website, last accessed 2016; Veterinary Medicines Directorate, website, last accessed 2017a).

290 Some products containing AGs, especially those with old marketing authorisations, are recommended  
291 for the treatment of “infections caused by susceptible organisms” in various animal species (FIDIN,  
292 website, last accessed 2016)

293 **Combination preparations:** AGs are often used in combination with other antimicrobials in order to  
294 achieve a synergistic effect or to broaden the spectrum of activity, such as with beta-lactams.  
295 Streptomycin and neomycin are authorised in the EU in combination with penicillin for treatment of a  
296 broad range of non-specific indications in livestock and companion animals (Veterinary Medicines  
297 Directorate, website, last accessed 2017a).

298 AGs are used in combination with beta-lactams and/or other antimicrobials in intramammary  
299 preparations. Common combinations for intramammary preparations for cows include  
300 neomycin/lincomycin, neomycin/streptomycin/penicillin, streptomycin/framycetin/penethamate,  
301 neomycin/penicillin, streptomycin/penicillin with or without nafcillin and  
302 neomycin/streptomycin/novobiocin/penicillin, among others.

303 Neomycin or (dihydro)streptomycin in combination with a beta-lactam is utilised for infections of the  
304 respiratory tract, digestive tract, nervous system and skin in various animal species.  
305 Neomycin/penicillin and streptomycin/penicillin combinations are licensed for the treatment of various  
306 infectious diseases in horses, sheep, pigs, dogs and cats caused by bacteria sensitive to the  
307 combination (Veterinary Medicines Directorate, website, last accessed 2017a). In pigs,  
308 spectinomycin/lincomycin combinations are used for the treatment of enzootic pneumonia,  
309 *Actinobacillus pleuropneumoniae* infections, porcine proliferative enteritis (*Lawsonia intracellularis*) and  
310 swine dysentery (FIDIN, website, last accessed 2016). In poultry, spectinomycin/lincomycin is applied  
311 for the treatment and prevention of chronic respiratory disease caused by *Mycoplasma gallisepticum*  
312 and *Escherichia coli* (Veterinary Medicines Directorate, website, last accessed 2017a). In the UK, a  
313 neomycin/streptomycin combination is used for prophylactic treatment in neonatal lambs, as an aid to  
314 prevention of enteric infection including watery mouth (enterotoxaemia caused by *E. coli*) and for the  
315 treatment of neomycin and streptomycin sensitive enteric infections in neonatal lambs (Veterinary  
316 Medicines Directorate, website, last accessed 2017a). The rationale for some of these combinations is  
317 disputable. Due to the widespread resistance of many bacterial species to streptomycin, streptomycin-  
318 penicillin combinations have very limited extra value. In addition, a synergistic effect of this  
319 combination has been shown for only a limited number of pathogens.

320 **Other applications of AGs:** certain AGs are used as anthelmintics in animals (destomycin A,  
321 hygromycin B). Furthermore, paromomycin, ribostamycin and streptomycin are used in horticulture as  
322 they have antifungal activity (Lee et al., 2005). Gentamicin is utilised as sperm diluter (Price et al.,  
323 2008) and as an antimicrobial preservative for vaccines. AGs are applied in apiculture, aquaculture and  
324 in other minor species such as rabbits, reptiles and birds, although safety and efficacy has not been  
325 established in all cases.

326

327 Table 1. Use of AGs in veterinary medicine

Substance	Volume of use (2014) (ESVAC <sup>1</sup> )	Major routes of administration in veterinary medicine by pharmaceutical form (oral, parenteral, local) and proportion of volume of sales	Duration of use	Species	Disease
kanamycin	< 2 tonnes	Two thirds parenteral and one third local sales. Some small sales for oral use.	3-4 days	Cattle	Gram-negative mastitis Septicaemia Respiratory infections Urogenital infections
gentamicin	12 tonnes	Two thirds parenteral, about one third oral. Some sales for local use.	Injection 3-5 days	Pigs Calves Horses Companion animals	Enteric infections Respiratory infections Septicaemia Metritis Ear, eye infections
amikacin	< 1 tonne	All parenteral		Horses	Septicaemia (foals) Metritis
apramycin	21 tonnes	Mostly oral, small parenteral use.	In DW (drinking water) 5-7 days, In-feed, up to 28 days	Poultry Pigs Calves	Enteric infections Enterobacteriaceae
tobramycin	No sales reported	Topical		Dogs	Eye infections caused by <i>Pseudomonas</i> spp.
streptomycin	7 tonnes	Two thirds oral, about one third parenteral. Some local use.	Injection 3 days	Poultry Cattle, pigs, sheep, Horses dogs	Leptospirosis
dihydrostreptomycin	129 tonnes	Mostly parenteral use, small oral use. Some local use.	Injection 3-5 days	Poultry Pigs Calves	Respiratory infections Enteric infections Gram negative mastitis
spectinomycin	70 tonnes	Four fifths oral sales, one fifth parenteral sales.	In DW 7 days Injection	Poultry Pigs Calves	Enteric infections Respiratory infections

<sup>1</sup> EMA/ESVAC, 2016, unpublished data.

Substance	Volume of use (2014) (ESVAC <sup>1</sup> )	Major routes of administration in veterinary medicine by pharmaceutical form (oral, parenteral, local) and proportion of volume of sales	Duration of use	Species	Disease
			3-7 days		
paromomycin	18 tonnes	Mostly sales for oral use, small amount sold for parenteral use.	Oral in DW 3-5 days	Pigs Calves Poultry	Enteric infections (Enterobacteriaceae,, cryptosporidium) Histomoniasis (turkeys).
framycetin	< 1 tonne	For parenteral and local use	Injection 3 days	Cattle Dogs	Gram negative mastitis Ear infections
neomycin	155 tonnes	Mostly sales for oral use, small sales for parenteral use. Some small sales for local use	Oral 3-5 days Injection 3 days	Poultry Pigs Horses Lambs, goats Cattle Companion animals	Enteric infections (Enterobacteriaceae) Septicaemia Ear, eye infections

328

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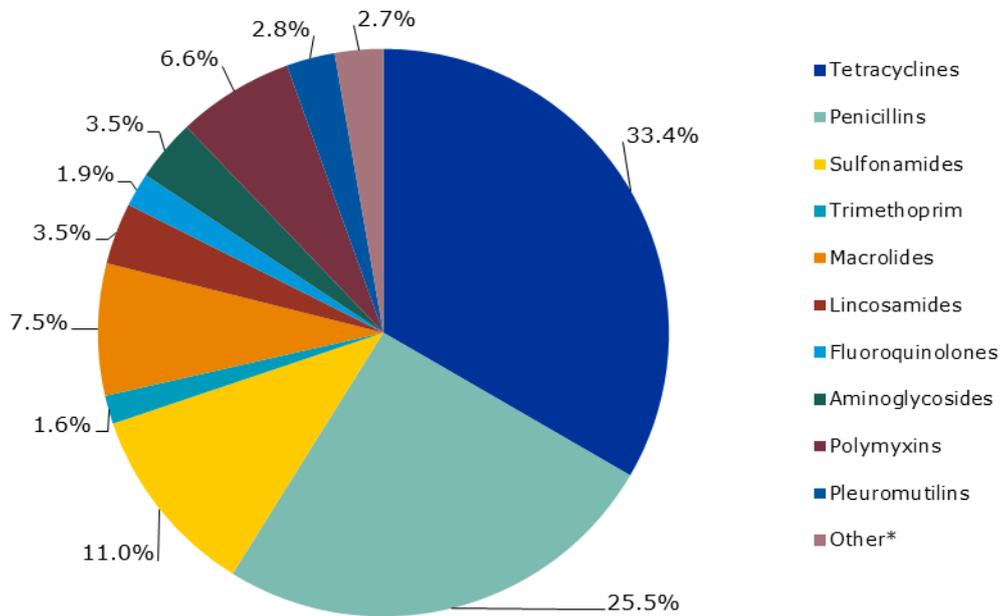
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331

332

In 2014, sales of AGs as percentage of the total sales for food-producing species (including horses), in mg/PCU, aggregated by 29 EU countries was 3.5 %. They are the 6<sup>th</sup> most common antimicrobial class used after tetracyclines, penicillins, sulfonamides, macrolides and polymyxins (Figure 1) (EMA/ESVAC, 2016).

333 **Figure 1.** Sales of antimicrobial agents by antimicrobial class as percentage of the total sales for food-  
 334 producing species (including horses), in mg/PCU, aggregated by 29 European countries, for 2014  
 335 (EMA/ESVAC, 2016)



336  
 337 \* Amphenicols, cephalosporins, other quinolones (classified as such in the ATCvet system).

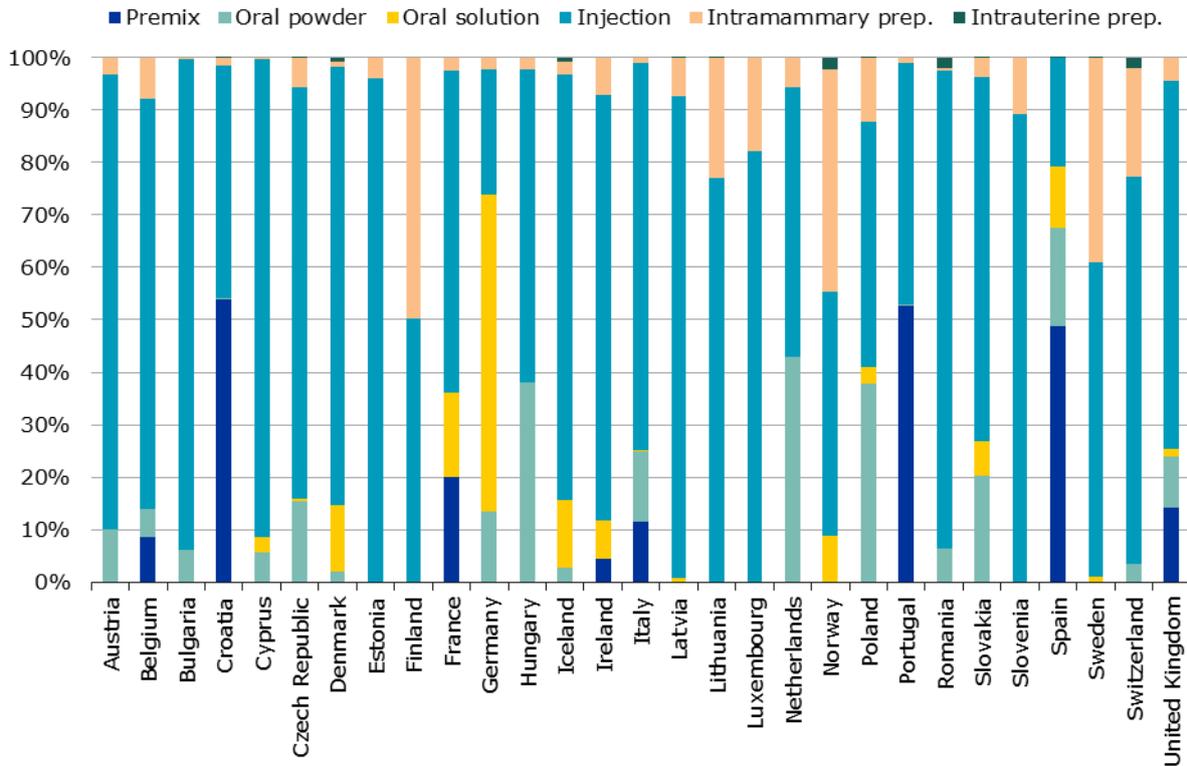
338  
 339 There are marked differences in the sales of AGs between the different EU countries, being lowest in  
 340 the Scandinavian countries and highest in Spain (Figure 2); these differences are not explained by the  
 341 differences in overall antimicrobial use between countries in all cases.

342 **Figure 2.** Spatial distribution of veterinary sales of AGs (amikacin, apramycin, (dihydro)streptomycin,  
343 framycetin, gentamicin, kanamycin, neomycin) for food-producing animals in mg/PCU in 29 European  
344 countries for 2014 (EMA/ESVAC, 2016). Sales of spectinomycin and paromomycin are not included as  
345 they are reported under 'other antimicrobials' in the ESVAC report.

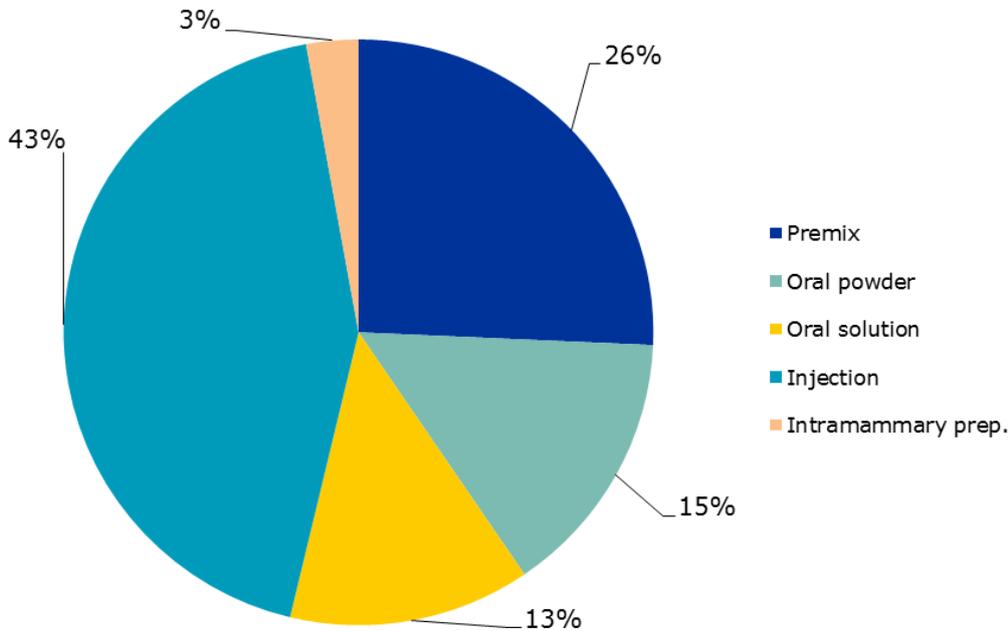


346  
347 In the EU, approximately half of AG use is in oral forms (premix, oral powder or soluble in drinking  
348 water) and about half is as injectables (Figure 3 and Figure 4) (EMA/ESVAC, 2016). The most  
349 frequently used AGs are neomycin, dihydrostreptomycin and spectinomycin (Figure 5). Other  
350 substances from the group used in food producing species (where maximum residue limits (MRLs)  
351 have been established) are: apramycin, gentamicin, kanamycin, paromomycin, neomycin, framycetin  
352 and streptomycin. Renal accumulation of AGs results in detectable drug residues for prolonged periods  
353 of time and impacts on the withdrawal periods to be applied.

354 **Figure 3.** Distribution of veterinary sales by pharmaceutical form for AGs, in mg/PCU, by country, for  
 355 2014 (EMA/ESVAC, 2016)

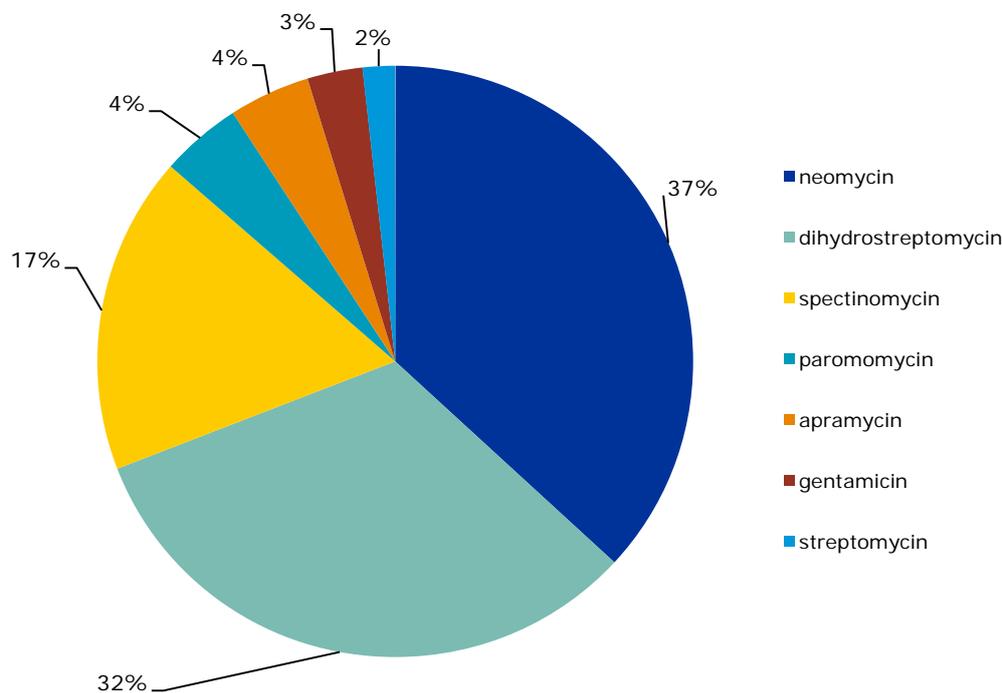


356 **Figure 4.** Distribution of veterinary sales by pharmaceutical form for AGs, for food-producing animals  
 357 (including horses), in mg/PCU, aggregated by 29 European countries, for 2014 (ESVAC, as available in  
 358 the Interactive Database). Sales of spectinomycin and paromomycin are not included.  
 359



360  
 361  
 362 In addition, 0.1% of the aminoglycosides were sold as intrauterine preparations.

363 **Figure 5.** Sales of aminoglycosides, spectinomycin and paromomycin in food-producing species, in  
364 percentage of total mg/PCU, aggregated for 29 European countries in 2014 (ESVAC, unpublished data)



365  
366 Minor sales ( $\leq 0.5\%$ ) of kanamycin, framycetin and amikacin were also reported in 2014.

### 367 ***PK/PD relationship and dosing regimens***

368 To date, no specific PK/PD concepts are established for AGs in veterinary medicine. Knowledge on  
369 relationships between PK/PD parameters and clinical outcome of AGs derives from experience in  
370 human medicine, although laboratory animals have served as *in vivo* models for human PK/PD  
371 considerations (Andes and Craig, 2002).

372 For concentration-dependent antimicrobial agents, optimal dosing involves administration of high doses  
373 with long dosing intervals (Dowling, 2013). PK/PD indices have been proposed from *in vitro* and *in*  
374 *vivo*-infection models and subsequently validated in retrospective or prospective human clinical trials  
375 (Toutain et al., 2002). Two PK/PD indices  $C_{max}/MIC$  (maximum concentration in serum or  
376 plasma/MIC) and 24-h AUC/MIC (area under the curve) are the most important PK/PD predictors for  
377 bacteriological and clinical efficacy of concentration-dependent antimicrobials (Craig, 1995; Jacobs,  
378 2001; Tulkens, 2005).

379 Most authors have proposed the  $C_{max}/MIC$  ratio as the PK/PD index of choice for AGs (gentamicin,  
380 tobramycin, amikacin). A  $C_{max}/MIC$  ratio of 10 was best related to clinical outcome of patients with  
381 pneumonia caused by aerobic Gram-negative rods and with bacteremia caused by *Pseudomonas*  
382 *aeruginosa* (Kashuba et al., 1999; Moore et al., 1987; Zelenitsky et al., 2003). Besides a  $C_{max}/MIC$   
383 ratio of 10-12 was determined to minimize the survival and overgrowth of resistant strains (Toutain et  
384 al., 2002). If this preferable peak to MIC ratio is obtained, most bacteria die within a short time, and  
385 consequently the effect of the time of drug exposure is minimal. Accordingly, in neutropenic and non-  
386 neutropenic models of infection, significantly more animals survived a potentially lethal challenge of  
387 bacteria when treated with a large dose of an AG rather than with the same dose given on an 8-hour

388 schedule. A high-dose and infrequent administration of AGs has also been shown to reduce the rate of  
389 nephrotoxicity (Ambrose et al., 2000). These findings and meta-analyses of different dosing regimens  
390 of AGs led to a shift in clinical dosing in humans from TID or BID to once a day treatments (Frimodt-  
391 Møller, 2002; Tulkens, 2005). The actual goal of AG therapy is to maximize peak concentrations to  
392 increase efficacy and reduce toxicity, to administer once-a-day and to reduce treatment duration as  
393 much as possible (Van Bambeke and Tulkens, 2011).

394 In veterinary medicine, the situation is more complex because of potential interspecies differences in  
395 pharmacokinetics and pharmacodynamics as well as differences in indications and target pathogens  
396 (Toutain, 2002). Besides, in animals AGs are to a large extent administered via the oral route for the  
397 treatment of gastrointestinal infections (Figure 4) where they exert their antibacterial activity in situ  
398 without being absorbed. Thus, for veterinary purposes human derived PK/PD concepts cannot be  
399 applied for oral applications at all and may be applied for parenteral applications by approximation,  
400 only.

401 When given via the parenteral route AGs were traditionally administered every 8-12 hours. Newer  
402 studies in veterinary patients support likewise high-dose, once daily therapy with AGs to avoid  
403 adaptive resistance and to reduce risks of toxicity. However, the optimal doses and the ideal drug  
404 monitoring strategy are still unknown. Dosages have to be modified in neonates and in animals with  
405 impaired liver or kidney function (Dowling, 2013).

406 In conclusion, prolonged treatment (longer than 7 days) should be avoided in order to reduce the risk  
407 of antimicrobial resistance. Dosing regimens, especially those for parenteral treatment, should be re-  
408 investigated.

### 409 **3. The use of aminoglycosides in human medicine**

410 Aminoglycosides are used primarily in infections involving aerobic, Gram-negative bacteria, such as  
411 *Pseudomonas*, *Acinetobacter*, and *Enterobacteriaceae*. Tobramycin, gentamicin, amikacin and  
412 netilmicin are used systemically for hospital acquired infections and *Pseudomonas* infections.  
413 Gentamicin, tobramycin, neomycin and paromomycin are used for topical application (Agence française  
414 de sécurité sanitaire des produits de santé, 2012). Kanamycin and amikacin are utilised for treatment  
415 of tuberculosis; streptomycin is rarely used. Amikacin may also be used against non-tuberculous  
416 mycobacterial infections.

417 In Belgium, the most applied AGs in hospitals are amikacin, gentamicin, and tobramycin (Ingenbleek  
418 et al., 2015). The most common route of administration for systemic infections is parenteral, by  
419 intravenous or intramuscular injection. Oral administration is limited to decontamination of the gut  
420 prior to surgery or in intensive care units, as bioavailability following oral administration is low (Huttner  
421 et al., 2013).

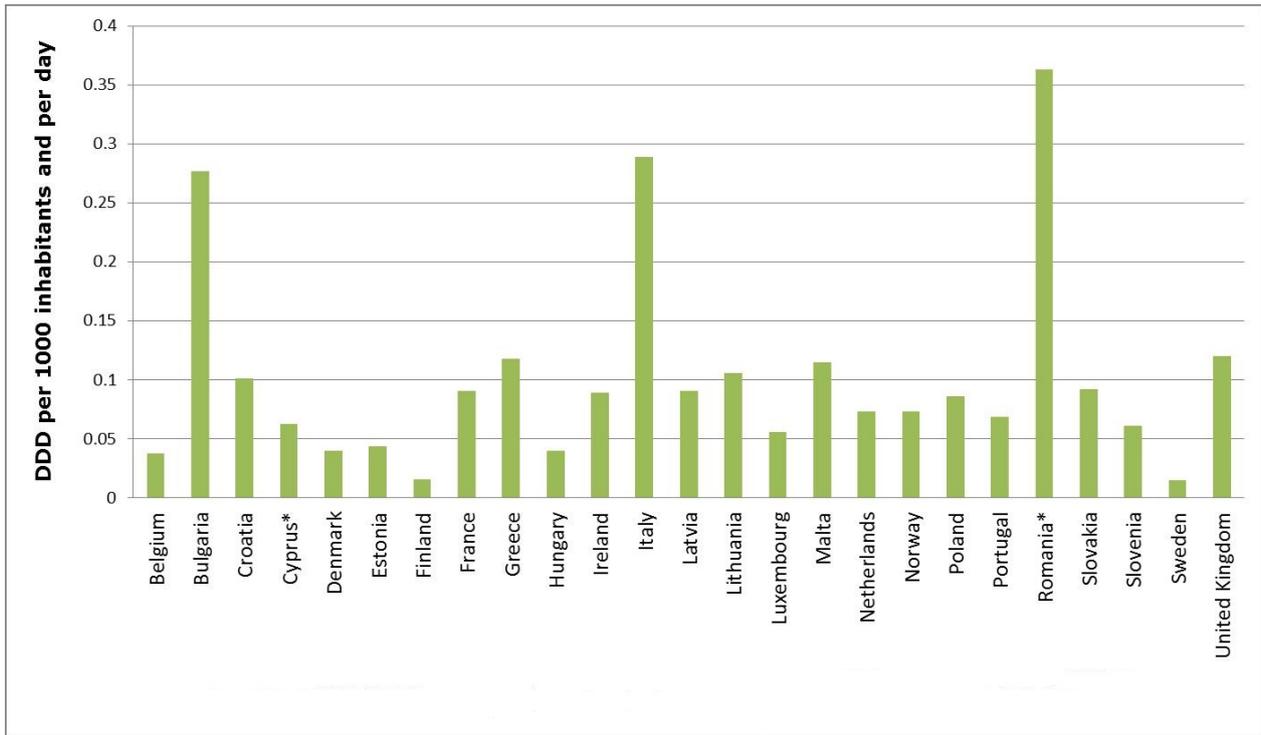
422 AGs are used for empirical treatment of sepsis, respiratory tract infections, urinary tract infections and  
423 some central nervous infections if multidrug-resistant Gram-negative bacteria are suspected to be  
424 involved (Poulikakos and Falagas, 2013). In addition, in combination with a beta-lactam or a  
425 glycopeptide, they are applied for the treatment of endocarditis caused by Gram-positive cocci.  
426 Enterococci are intrinsically resistant to low to moderate levels of AGs, but synergism is generally  
427 seen when they are combined with a cell-wall-active antimicrobial agent. Other applications are  
428 treatment of multidrug resistant tuberculosis and infections caused by Gram-negative pathogens,  
429 particularly *Enterobacteriaceae* (except for *Salmonella* spp.) and *Pseudomonas* spp. Streptomycin was  
430 the first AG to be used against tuberculosis, but is nowadays used less often due to high rates of

431 resistance and because it has to be used parenterally and the duration of therapy is usually long. As a  
432 second line of defence, kanamycin and amikacin are used to treat multidrug-resistant tuberculosis  
433 infections which are resistant to the front-line drugs isoniazid, rifampicin, and the fluoroquinolones  
434 (Labby and Garneau-Tsodikova, 2013). AGs are first line treatment for plague, brucellosis and  
435 tularaemia (Jackson et al., 2013). Aerosolized tobramycin, amikacin and gentamicin are used to treat  
436 *Pseudomonas* infections in patients with cystic fibrosis (Brodt et al., 2014; Jackson et al., 2013).  
437 Topical applications of various AGs are utilised for the treatment of ear infections and cutaneous  
438 leishmaniasis (Poulikakos and Falagas, 2013). Paromomycin is used to treat AIDS patients suffering  
439 from cryptosporidiosis (Fichtenbaum et al., 1993) and is an alternative against different parasites  
440 (amoebiasis, giardiasis) and sometimes used topically for the treatment of leishmaniasis.  
441 Spectinomycin is occasionally used for the treatment of gonorrhoea in patients allergic to penicillins  
442 (Table 2).

443 According to the ECDC/EFSA/EMA first joint report on the integrated analysis of the consumption of  
444 antimicrobial agents and occurrence of antimicrobial resistance in bacteria from humans and food-  
445 producing animals JIACRA (ECDC/EFSA/EMA, 2015), sales of AGs for animal use in 26 countries were  
446 290.8 tonnes, while sales of AGs for human use during the same period were 4.7 tonnes. (5.2 mg/PCU  
447 animals and 0.2 mg/PCU for humans based on data from the JIACRA report.)

448 In the European Surveillance of Antimicrobial Consumption (ESAC) survey, including data from 20  
449 European countries, details on the consumption of individual AGs are not reported separately. Available  
450 ESAC-Net data from 2015, however, show that there are large differences in AG consumption between  
451 MS, AG consumption being highest in Romania (0.363 DDD per 1000 inhabitants), Italy (0.289 DDD  
452 per 1000 inhabitants) and Bulgaria (0.277 DDD per 1000 inhabitants) whereas consumption is much  
453 lower in other countries, e.g. in Sweden (0.015 DDD per 1000 inhabitants) and Finland (0.016 DDD  
454 per 1000 inhabitants) (Figure 6). In a study applying ESAC-Net data and describing outpatient  
455 parenteral antibiotic treatment, out of antimicrobial classes given by the parenteral route, AGs were  
456 the second most commonly used (25.27%) after the cephalosporins (44.58%). Among the individual  
457 molecules gentamicin (18.53%) was more administered than the individual cephalosporins (e.g.  
458 ceftriaxone, 17.85%; cefazolin 13.16%) (Coenen et al., 2009).

459 **Figure 6.** Total consumption of aminoglycosides expressed as DDD per 1000 inhabitants in European  
 460 countries in 2015



461  
 462 \* Country provided only total care data.

463 Source: ESAC-Net (website, last accessed 2017)

464  
 465 Consumption data from European countries as outlined above are collected by continuous surveillance  
 466 data (ECDC, 2014b) aggregated per country, although many countries have their own surveillance  
 467 programme (DANMAP, 2013; NETHMAP, 2013). Long term monitoring in the Netherlands showed a  
 468 doubling of occurrence of treatment with AGs in the Netherlands both in primary (from 0.02 to 0.04  
 469 DDD/1000 inhabitant-days) and hospital care (from 2.1 to 3.9 DDD/1000 inhabitant-days) during the  
 470 last decade, similar to observations in ambulatory care in Belgium (RIZIV, 2011). In other European  
 471 countries (e.g. Norway) this is not observed (NORM/NORM-VET, 2014). Large teaching hospitals tend  
 472 to have the highest use (Ingenbleek et al., 2015; NETHMAP, 2013).

473 In addition to continuous surveillance as performed by the European Surveillance of Antimicrobial  
 474 Consumption survey in outpatients and the hospital sector, targeted point prevalence surveys are done  
 475 in hospitals (PPS HAI & AB) and long term care (HALT). Latest data show that on average 34.6% of  
 476 patients receive antimicrobial therapy in acute care hospitals (Zarb et al., 2012) versus 4.4% in long  
 477 term care facilities (LTCF) (HALT II) (ECDC, 2014a). Of these, the proportion of AG use was 4.5% and  
 478 1.2%, respectively. Considering the agents used in acute care, the most used AGs were gentamicin  
 479 3.7%, amikacin 1.1%, tobramycin 0.4%, netilmicin 0.1% (Zarb et al., 2012).

480

481 Table 2. Importance of AGs in human medicine

Antimicrobial class	Bacterial targets in human medicine (for which availability of class/substance is critically important due to few alternatives)	Relative frequency of use in humans in the EU	Hazard of resistance transfer between animals and humans
kanamycin	Rarely used, not for first line treatment, MDR infections including tuberculosis	low	<i>M. tuberculosis</i> is of limited zoonotic relevance
gentamicin	Gram-negative infections, enterococcal and streptococcal endocarditis, brucellosis, tularaemia, plague, oral decolonisation, impregnated beads to prevent surgical site infections	high	Enterobacteriaceae – high risk of horizontal transfer of resistance genes Enterococci – limited zoonotic risk
amikacin	MDR Gram-negative infections, MDR tuberculosis, Nocardia infections	high	<i>M. tuberculosis</i> is of limited zoonotic relevance
apramycin	No target	Not used	Selects for gentamicin resistance in <i>E. coli</i>
tobramycin	Gram-negative infections, Pseudomonas infections in cystic fibrosis	high	Enterobacteriaceae – high risk of horizontal transfer of resistance genes Enterococci – limited zoonotic risk
(dihydro)streptomycin	MDR tuberculosis, but very rarely used	low	<i>M. tuberculosis</i> is of limited zoonotic relevance
spectinomycin	Gonorrhoea in patients allergic to penicillins	low	Gonorrhoea is not transmitted to humans from non-human sources  Transfer of resistance genes from non-human sources unlikely
paromomycin	Cryptosporidiosis	low	<i>C. parvum</i> is of zoonotic relevance

482

## 483 4. Resistance mechanisms

484 Following extensive use of AGs in humans, food-producing animals and companion animals, resistance  
485 has emerged. Resistance occurs through several mechanisms. Resistance genes can be located on the  
486 chromosome, gene cassettes, plasmids, transposons or other mobile elements (Ramirez et al., 2013).

487 The three main mechanisms of bacterial resistance to AGs are the reduction of the intracellular  
488 concentration of the antibiotic, the enzymatic modification of the drug and the modification of the  
489 molecular target (Ramirez and Tolmasky, 2010). Resistance mechanisms are complex and differ  
490 between the AG molecules and between bacterial species, and generally there is less cross resistance  
491 when compared to other classes of antimicrobials. Many resistance genes are located on mobile  
492 elements increasing the likelihood of spread of AG resistance as well as co-resistance to other  
493 compounds (Ramirez and Tolmasky, 2010).

494 **Decreased intracellular concentration** can result from either reduced drug uptake or from active  
495 efflux mechanisms. Reduced uptake can occur in mutants deficient of components of the electron  
496 transport chain and has been described in *Pseudomonas* spp., *E.coli* and *S. aureus* (Taber et al., 1987).  
497 Gentamicin resistance by inactivation of an outer-membrane porin, which serves as an entry of  
498 gentamicin to the bacterial cell, has also been described (Poole, 2005).

499 AG efflux is a significant mechanism in *Pseudomonas* spp., *Burkholderia* spp., and *Stenotrophomonas*  
500 spp., but has also been described in other bacteria such as *E. coli*, *Lactococcus lactis* and *Acinetobacter*  
501 *baumanii*. There are five families of efflux systems: the major facilitator superfamily (MF), the ATP-  
502 binding cassette family (ABC), the resistance-nodulation division family (RND), the small multidrug  
503 resistance family (SMR), and the multidrug and toxic compound extrusion family (MATE). The majority  
504 of AG transporters belong to the RND family (Poole, 2005). Genes encoding for AG efflux mechanisms  
505 are most often located on the chromosome, but members of the major facilitator superfamily (MF) can  
506 also be located on plasmids. Inhibitory as well as sub-inhibitory AG concentrations can lead to  
507 resistance. The ability of bacteria to survive antibiotic challenge without mutation is called adaptive  
508 resistance and can be caused by a decreased transport of the drug into the bacterial cell (Dowling,  
509 2013). Adaptive resistance of *P. aeruginosa* has been shown to be associated with the overproduction  
510 of the RND efflux system MexXY-OprM (Hocquet et al., 2003). The clinical significance of adaptive  
511 resistance is that frequent dosing or constant infusion is less effective than high-dose, once daily  
512 administration as AGs act in a concentration-dependent manner (Dowling, 2013).

513 **Enzymatic drug modification.** Roberts et al. (2012) give an overview of most acquired resistance  
514 genes. A few novel spectinomycin resistance genes in staphylococci have been discovered since then  
515 (Jamrozy et al., 2014; Wendlandt et al., 2014; Wendlandt et al., 2013d). Resistance genes for AG  
516 modifying enzymes are often found on mobile elements. The most common mechanism of resistance  
517 to AGs in clinical isolates is the production of AG modifying enzymes such as acetyltransferases (AAC),  
518 phosphotransferases (APH) and nucleotidyltransferases (ANT) (Potron et al., 2015; Roberts et al.,  
519 2012; van Hoek et al., 2011). These enzymes modify the AG at the hydroxyl- or aminogroups of the 2-  
520 deoxystreptamine nucleus or the sugar moieties preventing ribosomal binding. Within the three major  
521 classes of modifying enzymes, a further subdivision can be made based on the target site of the  
522 enzymes (Roberts et al., 2012). To date, there are four acetyltransferases: AAC(1), AAC(2'), AAC(3),  
523 and AAC(6'); five nucleotidyltransferases: ANT(2''), ANT(3''), ANT(4'), ANT(6), and ANT(9); and seven  
524 phosphotransferases: APH(2''), APH(3'), APH(3''), APH(4), APH(6), APH(7''), and APH(9) (Roberts et  
525 al., 2012). Occasionally several subtypes of these enzymes are present in bacteria. The ACC enzymes  
526 are mainly found in Gram-negative bacteria such as Enterobacteriaceae, *Acinetobacter* spp. and  
527 *Pseudomonas* spp. They can, however, also be found in Gram-positive bacteria such as *Mycobacterium*

528 spp., *Streptomyces* spp., and *Enterococcus* spp. In addition, the bifunctional enzyme AAC(6')-APH(2'')  
529 can acetylate and subsequently phosphorylate its substrate. This enzyme has been found in  
530 *Enterococcus* spp., *Staphylococcus* spp., *Streptococcus* spp., and *Lactobacillus* spp.. The substrate  
531 profile of AAC(1) enzymes include neomycin, apramycin and paromomycin and that of AAC(2')  
532 enzymes include gentamicin, kanamycin, tobramycin, netilmicin, and dibekacin. Enzymes of subclass  
533 AAC(3)-I confer resistance to fortimicin, sisomicin and gentamicin, while those of subclass AAC(3)-II  
534 confer resistance to gentamicin, tobramycin, sisomicin, netilmicin, and dibekacin. AAC(6') enzymes are  
535 by far the most common acetyltransferases and cause resistance to gentamicin and sometimes  
536 amikacin. AAC(6')-Ib-cr is an enzyme that also confers resistance to selected fluoroquinolones such as  
537 ciprofloxacin (Ramirez and Tolmasky, 2010) (Table 3).

538 The ANTs represent the smallest class of AG inactivating enzymes. These enzymes catalyze the  
539 reaction between Mg-ATP and AGs to form the O-adenylated antibiotic molecule. To date, there are  
540 five classes of ANTs categorized depending on the position of adenylation on the AG molecule (Ramirez  
541 and Tolmasky, 2010). The ANT(2'') and ANT(3'') enzymes are more frequent among Gram-negative  
542 bacteria, whereas the ANT(4'), ANT(6), and ANT(9) enzymes are most often found in Gram-positive  
543 bacteria (Ramirez and Tolmasky, 2010; Shaw et al., 1993). The genes coding for all of these enzymes  
544 are often located on mobile genetic elements. ANT(6) enzymes have streptomycin as their substrate.  
545 The *ant(6)* gene is often found in a cluster *ant(6)-sat4-aph(3')-III* that specifies resistance to AGs and  
546 streptothricin. ANT(9) cause resistance to spectinomycin. ANT(4') enzymes confer resistance to  
547 tobramycin, amikacin and isepamicin. ANT(2'') mediates resistance to gentamicin, tobramycin,  
548 dibekacin, sisomicin and kanamycin. ANT(3'') are the most commonly found ANT enzymes. They  
549 specify resistance to spectinomycin and streptomycin (Ramirez and Tolmasky, 2010).

550 APHs catalyze the transfer of a phosphate group to the AG molecule. They are widely distributed  
551 among bacterial pathogens and are encoded by genes usually found on multidrug resistance plasmids  
552 and transposons (Ramirez and Tolmasky, 2010). APH(2'') plays an important role in Gram-positives  
553 resistant to gentamicin. APH(3')-IIIa, generally found in Gram-positive bacteria, confers resistance to a  
554 broad range of AGs including neomycin, paromomycin, kanamycin and amikacin, but not tobramycin or  
555 gentamicin. Isolates carrying APH(3) group enzymes show a resistance profile most often including  
556 kanamycin, neomycin and paromomycin, and APH(3') also to amikacin. APH(3'') mediates resistance to  
557 streptomycin. APH(4) mediates resistance to hygromycin and is not clinically relevant. APH(6) enzymes  
558 confer resistance to streptomycin. APH(7'') mediates resistance to hygromycin. APH(9) enzymes confer  
559 resistance to spectinomycin (Ramirez and Tolmasky, 2010).

560 **Target modification.** Target-site modification naturally occurs in AG-producing bacteria: the  
561 bacterium protects the target by employing enzymes that add a methyl group to specific nucleotides in  
562 the 16S rRNA that are essential for AG binding, thus, inhibiting the antibiotic action without interfering  
563 with other ribosomal functions. This mechanism was described mainly in different species of the AG-  
564 producing genera *Streptomyces* and *Micromonospora*. Nowadays, the methylation of the ribosomal  
565 target responsible for high-level AG resistance is an emerging mechanism of great concern in clinically  
566 relevant Gram-negative bacteria. The first plasmid-mediated gene identified was the 16S rRNA  
567 methylase *armA* (Galimand et al., 2003). To date nine additional genes encoding methylases have  
568 been reported: *rmtA*, *rmtB*, *rmtC*, *rmtD*, *rtmD2*, *rmtE*, *rmtF*, *rmtG* and *npmA* (Potron et al., 2015). The  
569 genes encoding these determinants are usually located on mobile genetic elements and have been  
570 associated with genes coding for resistance to other antibiotic classes, such as quinolones (Qnr  
571 proteins) or  $\beta$ -lactam antibiotics (acquired AmpC- $\beta$ -lactamases or extended-spectrum  $\beta$ -lactamases  
572 (ESBLs)). Recently these methyltransferases have been found in association with carbapenemases  
573 such as NDM-1 (Hidalgo et al., 2013b; Ho et al., 2011). The genes (*rmtA*, *rmtB*, *rmtC*, *rmtD*, *rtmD2*,

574 rmtE, rmtF, rmtG) confer resistance to gentamicin, tobramycin, kanamycin and amikacin whereas  
575 npmA confers resistance to gentamicin, tobramycin, kanamycin, amikacin, neomycin and apramycin,  
576 but not to streptomycin (Garneau-Tsodikova and Labby, 2016; Wachino and Arakawa, 2012).

577 Resistance to various AGs in staphylococci can be mediated by the genes *aacA/aphD*  
578 (kanamycin/gentamicin/tobramycin/amikacin resistance), *aadD* (kanamycin/neomycin/tobramycin  
579 resistance), *aphA3* (kanamycin/neomycin/amikacin resistance), *apmA* (apramycin resistance and  
580 decreased susceptibility to gentamicin) (Feßler et al., 2011; Wendlandt et al., 2013a), and *aadE* or *str*  
581 (streptomycin resistance) (Wendlandt et al., 2013b; Wendlandt et al., 2013c). Spectinomycin  
582 resistance in staphylococci is mostly mediated by spectinomycin 9-O-adenyltransferase encoded by the  
583 *spc* gene located on a transposon. Resistance in staphylococci to spectinomycin can also be due to the  
584 plasmid-associated gene *spd* and the chromosomal- or plasmid-located gene *spw* (Jamrozny et al.,  
585 2014; Wendlandt et al., 2013d).

586 AG resistance in Enterobacteriaceae mainly relies on the AG-modifying enzymes (APH, ANT and AAC).  
587 As mentioned before, AG efflux is a significant mechanism in *P. aeruginosa*. In *Acinetobacter*  
588 *baumannii*, the *armA* gene, located on a transposon, is widespread in many countries worldwide  
589 (Potron et al., 2015). In addition, *rmtB* has recently been identified in nine *A. baumannii* isolates in  
590 Vietnam (Tada et al., 2013).

591 In *Mycobacterium tuberculosis*, mutations in the genes *rpsL* and *rrs* encoding the ribosomal protein  
592 S12 and the 16S rRNA, respectively, are responsible for most of the high-level streptomycin  
593 resistance. The *rrs* A1401G is the most frequent mutation conferring amikacin and kanamycin  
594 resistance (Cohen et al., 2014). Overexpression of the AG acetyltransferase-encoding gene, *eis*, has  
595 mainly been associated with resistance to kanamycin. EIS is a unique enzyme capable of acetylating  
596 multiple positions of any given AG scaffold (Chen et al., 2011). This overexpression resulted from  
597 either point mutations in the promoter region of the *eis* gene or mutations of the *whiB7* gene, which  
598 encodes a putative regulator of the *eis* gene (Sowajassatakul et al., 2014). Although *eis* has been  
599 mainly associated with kanamycin resistance, resistance to amikacin has also been reported (Cohen et  
600 al., 2014). The gene *gidB*-when mutated- was found to be associated with low-level streptomycin  
601 resistance (Spies et al., 2008). The *gidB* gene encodes a 7-methylguanosine methyltransferase that  
602 specifically modifies residues in the 16S rRNA (*rrs*). It is a nonessential gene, and loss-of-function  
603 mutations in *gidB* result in failure to methylate G527 within the 530 loop of the 16S rRNA molecule.  
604 Many different *gidB* mutations, including deletions are associated with AG resistance, suggesting that  
605 loss of function of this gene confers resistance (Cohen et al., 2014).

606

Resistance gene	Aminoglycoside to which this gene confers resistance	Occurrence
<b>Acetyltransferases</b>		
AAC (1)	neomycin, apramycin, paromomycin	<i>uncommon</i>
AAC (2')	gentamicin, tobramycin, kanamycin, netilmicin, dibekacin	<i>uncommon</i>
AAC (3) subclass I	gentamicin	<i>uncommon</i>
AAC (3) subclass II	gentamicin, tobramycin, netilmicin, dibekacin, sisomycin, kanamycin	<i>uncommon</i>
AAC (3) subclass III	gentamicin, tobramycin, netilmicin, neomycin	<i>uncommon</i>
AAC (3) subclass IV	gentamicin, tobramycin, (kanamycin), netilmicin, neomycin	<i>uncommon</i>
AAC (6')	(amikacin), gentamicin	<i>common</i>
<b>Phosphotransferases</b>		
APH (2'')	gentamicin	<i>uncommon</i>
APH (2'')/ AAC (6')	gentamicin, tobramycin, kanamycin, (amikacin)	<i>common in Gram-positives</i>
APH (3') subclass I	kanamycin, neomycin, paromomycin	<i>common</i>
APH (3') subclass II	kanamycin, neomycin, paromomycin	<i>common</i>
APH (3') subclass III	kanamycin, neomycin, paromomycin, (amikacin)	<i>highly disseminated in Gram-positives</i>
APH (3'')	streptomycin	<i>common</i>
APH (6)	streptomycin	<i>uncommon</i>
APH (9)	spectinomycin	
<b>Nucleotyltransferases</b>		
ANT (2') (synonym <i>aadB</i> )	gentamicin, tobramycin, kanamycin, dibekacin, sisomycin	<i>common in integrons</i>
ANT (3'') (synonym <i>aadA</i> )	streptomycin, spectinomycin	<i>very common</i>
ANT (4') (synonym <i>aadD</i> , <i>aad2</i> )	tobramycin, amikacin, isepamicin (dibekacin)	
ANT (6) (synonym <i>aadE</i> )	streptomycin	<i>very common</i>
ANT (9) (synonym <i>aad(9)</i> or <i>spc</i> )	spectinomycin	<i>uncommon</i>
<b>Methyltransferases</b>		
<i>armA</i>	gentamicin, tobramycin, kanamycin, amikacin,	
<i>rmtA</i> , <i>rmtB</i> , <i>rmtC</i> , <i>rmtD</i> , <i>rtmD2</i> , <i>rmtE</i> , <i>rmtF</i> , <i>rmtG</i>	gentamicin, tobramycin, kanamycin, amikacin	<i>uncommon</i>
<i>npmA</i>	gentamicin, tobramycin, kanamycin, amikacin, neomycin, apramycin	<i>uncommon</i>

## 609 **5. Consideration on susceptibility testing of aminoglycosides**

610 Susceptibility data from national monitoring programs are available and MIC determination via broth  
611 microdilution is the most frequently used method in these programs. Methodologies used differ among  
612 countries as they use different standards and guidelines (EUCAST, CLSI or country-specific ones),  
613 different antimicrobial agents for the same bacteria, different concentration ranges for the same  
614 antimicrobial agent and different interpretative criteria (Schwarz et al., 2013). A standard defines  
615 specific and essential requirements for materials, methods and practices to be used in a non-modified  
616 form. In contrast, guidelines describe criteria for a general operating practice, procedure or material  
617 for voluntary use. A guideline can be used as written or can be modified by the user to fit specific  
618 needs. This hampers comparison of the results. *In vitro* susceptibility testing for many antimicrobials  
619 including AGs is problematic for many bacterial species, since standards and guidelines for  
620 determination of minimal inhibitory concentrations (MIC) do not include all micro-organisms. Single  
621 class representatives cannot be used for AGs as resistance is not a class effect, i.e. there are numerous  
622 resistance genes specifying a wide variety of resistance mechanisms with in part strikingly different  
623 substrate spectra. Resistance to streptomycin and spectinomycin for example is distinct from  
624 resistance to gentamicin, kanamycin and/or tobramycin (Schwarz et al., 2010). Counterwise, unrelated  
625 enzymes, affecting different sites, can confer the same resistance phenotypes. Despite these  
626 difficulties the enzymes produced by isolates can sometimes be predicted from susceptibility testing  
627 (Livermore et al., 2001).

628 To date, EUCAST has no veterinary-specific breakpoints. However, CLSI has veterinary-specific  
629 breakpoints for amikacin applicable to *E. coli*, and *P. aeruginosa* from dogs, foals, adult horses,  
630 *Staphylococcus* spp. from dogs, *S. aureus* from foals and adult horses, *Streptococcus* spp. from dogs,  
631 *Streptococcus equi* subsp. *zoepidemicus* and subsp. *equi* from foals and adult horses (CLSI, 2015a).

632 For *Enterococcus* spp. (*E. faecalis*, *E. faecium*, *E. gallinarum*/*E. casseliflavus*), aminoglycosides (except  
633 when tested positive for high-level resistance) may appear to be active *in vitro*, but are not effective  
634 clinically and should not be reported as susceptible. Anaerobic bacteria, such as *Clostridium* spp.,  
635 *Bacteroides* spp. and *Fusobacterium canifelinum* are intrinsically resistant to AGs (CLSI, 2015b).

636 A recent study showed that results of susceptibility testing for gentamicin for *K. pneumoniae* resistant  
637 to carbapenems obtained with Vitek 2 and Etest should be interpreted with caution, especially if the  
638 EUCAST breakpoints were used. False gentamicin susceptibilities were observed using Vitek 2 and  
639 occurred with *K. pneumoniae* isolates carrying *armA* (Arena et al., 2015).

640 Susceptibility testing of *Pseudomonas* isolates against tobramycin using MALDI-TOF MS technology has  
641 been explored and was able to distinguish between resistant and susceptible isolates. Therefore, this  
642 technique has the potential to allow for the susceptibility testing of a much wider range of antimicrobial  
643 substances in the future (Jung et al., 2014).

644

## 645 **6. Occurrence of resistance in bacteria from animals**

### 646 **6.1. Food-producing animals**

647 Generally, resistance to streptomycin is very common while resistance to the other AGs is detected  
648 less frequently. Resistance in Dutch Salmonella isolates was uncommon for gentamicin and kanamycin  
649 (2-3 %), but 31 % of the isolates were resistant to streptomycin. In Campylobacter isolates from pigs  
650 and poultry, resistance was very rare for gentamicin and neomycin (0-0.6 %), while the level of  
651 resistance to streptomycin was high (49 %). For *E. coli*, 2 %, 4 % and 34 % of the isolates were  
652 resistant to gentamicin, kanamycin and streptomycin, respectively and the resistance levels were  
653 highest in isolates from conventional broilers. For *Enterococcus* spp. the levels of resistance were high  
654 for streptomycin (30-43 %) and low for gentamicin (2 %). Reduced susceptible and resistant isolates  
655 were defined using epidemiological cut-off values (MARAN, 2014). In Denmark, porcine Salmonella  
656 isolates were often resistant to streptomycin (47 %), while resistance to gentamicin, apramycin and  
657 neomycin was rare (2-3 %). The level of resistance among Danish *Campylobacter jejuni* isolates to  
658 streptomycin and gentamicin was very low. The level of resistance to streptomycin and kanamycin  
659 among Enterococcus isolates was much higher for imported broiler meat than for Danish broiler meat  
660 (DANMAP, 2013). The level of AG resistant *E. faecalis* was higher in pigs than in broilers. The level of  
661 resistance of *E. coli* in Denmark was low in broilers and cattle for all AGs tested. In pigs, 42 % of *E.*  
662 *coli* isolates were resistant to streptomycin, while only 1-2 % of the isolates were resistant to  
663 gentamicin, apramycin and neomycin (DANMAP, 2013). In 2014 recommendations for the panel used  
664 for susceptibility testing by EFSA changed, excluding streptomycin, neomycin, apramycin and  
665 spectinomycin, depending on the bacterial species tested. Generally the levels of resistance to  
666 gentamicin of *E. coli*, enterococci, Campylobacter and Salmonella were low in 2014 and 2015  
667 (DANMAP, 2015).

668 Data from 17 MS show that resistance to gentamicin in Salmonella isolates from *Gallus gallus* is  
669 generally low (5.9%), but there are big differences between MS: in most MS resistance to gentamicin  
670 was either not detected or low, but among the relatively large proportion of isolates from Romania,  
671 moderate levels of resistance to gentamicin (18.4 %) were reported, thus influencing the overall  
672 resistance levels. In addition, there are also differences between Salmonella species: in *S. Kentucky*  
673 (n=47) from *Gallus gallus* from Italy, Romania and Spain resistance to gentamicin was common, 64%  
674 of isolates being non-susceptible (EFSA/ECDC, 2015); in Salmonella isolates from turkey resistance to  
675 gentamicin was 8.8%, but in *S. Kentucky* the percentage of resistant isolates was as high as 85%  
676 (EFSA/ECDC, 2015). The percentage of Salmonella isolates resistant to gentamicin originating from  
677 cattle and pigs was generally very low. Resistance to gentamicin was not found in *Campylobacter*  
678 *jejuni* from broilers, whereas only 2.5% of *Campylobacter coli* isolates were gentamicin resistant.  
679 Levels of resistance to gentamicin was also low in *Campylobacter coli* isolates from pigs (1.9%) and  
680 *Campylobacter jejuni* isolates from cattle (0.9%) (EFSA/ECDC, 2015). Resistance to streptomycin was  
681 generally high in *E. coli* isolates from *Gallus gallus*, pigs and cattle (45.7%, 47.8% and 17.6%  
682 respectively), whereas resistance to gentamicin was low (6.4%, 1.8% and 2% respectively). In  
683 *Enterococcus faecium* and *E. faecalis* isolates resistance to streptomycin was relatively common  
684 (between 10% and 60%, depending on the animal and bacterial species), while resistance to  
685 gentamicin was rarely found (EFSA/ECDC, 2015).

686 Equine *E. coli* isolates were generally susceptible to gentamicin and the resistance rate was only 8.8 %  
687 (Schwarz et al., 2013). A significant increase in the percentage of *E. coli* isolates resistant to

688 gentamicin was identified in equine *E. coli* isolates from 2007-2012 (53.9 %) compared to isolates  
689 from 1999-2004 (28.5 %) (Johns and Adams, 2015).

690 Characterization of 227 *Streptococcus suis* isolated from pigs during 2010 - 2013 showed high level  
691 resistance to neomycin (70.0%) and gentamicin (55.1%) and resistance to AGs was attributed to  
692 aph(3')-IIIa and aac(6')Ie-aph(2'')-Ia genes (Gurung et al., 2015; Schwarz et al., 2013). Integron-  
693 borne AG and sulphonamide resistance was found frequently among avian pathogenic *E. coli* (APEC) in  
694 Italy. High levels of resistance were observed for streptomycin (67.2%), whereas resistance against  
695 gentamicin (16.7%), kanamycin (14.7%), and apramycin (3.0%) was lower (Cavicchio et al., 2015).

696 Bovine *Pasteurella multocida* remain relatively susceptible to AGs with 60 %, 92 %, 90 % and 99 % of  
697 the isolates being susceptible to streptomycin, spectinomycin, neomycin and gentamicin, respectively.  
698 In France, 82 % of all *Mannheimia haemolytica* isolates were susceptible to spectinomycin and  
699 neomycin and 88 % to gentamicin. Coagulase-positive staphylococci isolated from the udder were  
700 often susceptible to all AGs tested, with 88 % to 99 % of the isolates susceptible to streptomycin,  
701 kanamycin, neomycin and gentamicin. Equine *E. coli* isolates were often resistant to streptomycin, with  
702 approximately half of the isolates being susceptible, whereas most *E. coli* isolates remained susceptible  
703 to amikacin, gentamicin, neomycin and kanamycin (76 %-100 % susceptibility). Among equine *S.*  
704 *aureus* isolates susceptibility to AGs was 88 % for kanamycin and 89 % for gentamicin and  
705 streptomycin (Anses, 2015). The emergence of 16SrRNA methylases in bacteria of animal origin was  
706 first discovered in Spain in 2005 in an *E. coli* isolate of pig origin harbouring the *armA* gene (Gonzalez-  
707 Zorn et al., 2005). Since then the same mechanism has been detected in *E. coli* isolates from pigs,  
708 chicken, and cows in different countries (Chen et al., 2007; Davis et al., 2010; Deng et al., 2011; Du  
709 et al., 2009; Hopkins et al., 2010; Liu et al., 2008). To date, 16SrRNA methylases do not appear to be  
710 common in veterinary bacteria in EU MS, but the use of most AGs would select for resistance as these  
711 enzymes result in resistance to almost all AGs, especially those of clinical relevance in humans.

712 Resistance to gentamicin, tobramycin and kanamycin was common (36%) among MRSA CC398  
713 isolates collected from pigs at Dutch slaughterhouses (de Neeling et al., 2007). Non-susceptibility to  
714 gentamicin was also found among MRSA isolates on broiler farms (Wendlandt et al., 2013b). Non-  
715 susceptibility to gentamicin (40%), neomycin (30%) and amikacin (1%) was found among 1290 MRSA  
716 isolates from pigs, veal calves, poultry and meat in the Netherlands (Wagenaar and Van de Giessen,  
717 2009). High prevalence of non-susceptibility to AGs has been reported in methicillin-susceptible *S.*  
718 *aureus* CC398 isolates (Vandendriessche et al., 2013). MRSA CC1 isolates from dairy cattle and  
719 humans in Italy were often kanamycin resistant and carried *aphA3* and *sat* (conferring streptothricin  
720 resistance) genes with Tn5405-like elements, and contained several markers indicating a human origin  
721 (Alba et al., 2015).

## 722 **6.2. Companion animals**

723 According to data from Resapath (Anses, 2015), France, susceptibility percentages for feline *E. coli*  
724 were 59 % for streptomycin, 92 % for kanamycin, 97 % for gentamicin and 89 % for neomycin.  
725 Among coagulase-positive staphylococci originating from skin and muscular infections in dogs, 63 %  
726 and 59 % were susceptible to streptomycin and kanamycin respectively and 86 % were found  
727 susceptible to gentamicin. Susceptibilities of feline staphylococci were similar. Canine *E. coli* isolates  
728 were generally susceptible to gentamicin (> 90 % of isolates susceptible). In Germany, 96 % of canine  
729 and feline *S. aureus* isolates from ear infections and 84 % of *S. aureus* from skin infection were  
730 susceptible to gentamicin. Gentamicin susceptibility percentages for *S. pseudintermedius* isolates were  
731 87 % for isolates from ear infections and 74 % for isolates from skin infections. Resistance in *P.*

732 *aeruginosa* isolates from ear infections of companion animals was found in 25 % of the isolates, while  
733 only 41 % of the isolates were fully susceptible (Schwarz et al., 2013). Among 103 methicillin-resistant  
734 *S. pseudintermedius* isolates from dogs originating from several countries in Europe, the USA and  
735 Canada resistance to gentamicin/kanamycin (88.3%), kanamycin (90.3%), streptomycin (90.3%) and  
736 streptothricin (90.3%) was very common (Perreten et al., 2010). Among clinical ESBL-producing  
737 Enterobacteriaceae from companion animals resistance to AGs was encoded by *aadA1* (29% of all  
738 isolates), *aadA2* (17%), *aadA4* (14%), *aac(6′)-Ib* (8%), *strA* (3%), *strB* (25%) and *ant2a* (8%)  
739 (Dierikx et al., 2012).

740 In Spain, seven *K. pneumoniae* ST11 isolates from dogs and cats were found to be resistant to AGs,  
741 and the ArmA methyltransferase was responsible for this phenotype (Hidalgo et al., 2013a). In China,  
742 the *rmtB* gene was detected in 69 out of 267 Enterobacteriaceae isolates collected from pets. The *rmtB*  
743 gene was commonly found with ESBL *bla*<sub>CTX-M-9</sub> group genes within the same IncFII plasmid (Deng et  
744 al., 2011).

## 745 **7. Possible links between the use of AGs in animals and** 746 **resistance in bacteria of animal origin**

747 A systematic review on the effect of oral antimicrobials on antimicrobial resistance in porcine *E. coli*  
748 found that oral administration of AGs increased the prevalence of antimicrobial resistance (Burow et  
749 al., 2014). Sun et al. (2014) investigated the effect of treatment of sows with lincomycin,  
750 chlortetracycline and amoxicillin on resistance development of the intestinal microbiota. The treatment  
751 increased the abundance of AG resistance genes, probably due to co-selection. Apramycin and  
752 neomycin fed in subtherapeutic concentrations to pigs enhanced transfer of an antimicrobial resistance  
753 plasmid from commensal *E. coli* organisms to *Yersinia* and *Proteus* organisms in an infection model  
754 using isolated ligated intestinal loops (Brewer et al., 2013). Apramycin consumption at farm level in  
755 pigs was most probably driving the increasing occurrence of apramycin/gentamicin cross-resistant *E.*  
756 *coli* in diseased pigs and healthy finishers at slaughter in Denmark. The duration of use and amounts  
757 used both had a significant effect on the prevalence of apramycin/gentamicin cross-resistance in  
758 diseased weaning pigs at the national level (Jensen et al., 2006). Another Danish study investigated  
759 the effect of apramycin treatment on transfer and selection of a multidrug-resistant *E. coli* strain in the  
760 intestine of pigs and found that the use of apramycin may lead to enhanced spread of gentamicin-  
761 resistant *E. coli* (Herrero-Fresno et al., 2016). In a study investigating the influence of oral  
762 administration of a fluoroquinolone, an AG and ampicillin on prevalence and patterns of antimicrobial  
763 resistance among *E. coli* and *Enterococcus* spp. isolated from growing broilers, the overall resistance to  
764 all drugs tested reached the highest level among enterococci after medication with gentamicin. The  
765 frequency of resistance against most antimicrobials tested was significantly higher in *E. coli* isolated  
766 from broilers receiving intermittent antimicrobial pressure than that from non-medicated broilers (Da  
767 Costa et al., 2009). On a German broiler farm, resistance to spectinomycin in *E. coli* isolates increased  
768 significantly with age in all three production turns, despite the fact that the substances was not used  
769 on the farm. A possible explanation for this phenomenon was co-selection by the use of other  
770 antimicrobials (Schwaiger et al., 2013).

771 Selection of an ESBL plasmid conferring resistance not only to  $\beta$ -lactams but also to AGs, tetracycline,  
772 trimethoprim, sulfonamides, and erythromycin, as well as biocides and heavy metals occurred *in vitro*  
773 by the use of different antibiotics, including kanamycin at concentrations far below the MIC (Gullberg et  
774 al., 2014). These findings suggest that low concentrations of antibiotics present in polluted external  
775 environments and in the gut of exposed animals and humans could allow for selection and enrichment

776 of bacteria with multi-resistance plasmids and thereby contribute to the emergence, maintenance, and  
777 transmission of antibiotic-resistant disease-causing bacteria.

778 In conclusion, there is evidence that the usage of AGs in veterinary medicine is associated with the  
779 increased prevalence of resistance in bacteria in animals. Usage of AGs in humans is also associated  
780 with increased prevalence of resistance in humans. In human isolates from the Enterobacteriaceae  
781 family, there was a significant effect of selection pressure of gentamicin in the selection of resistant *K.*  
782 *pneumonia* and *E. coli* and amikacin in the selection for resistant *E. coli* and *E. cloacae* isolates  
783 (Sedláková et al., 2014). Another study showed that the abundance of antibiotic resistance genes  
784 more than doubled during selective digestive decontamination with colistin, tobramycin and  
785 amphotericin B in ICU patients, mainly due to a 6.7-fold increase in AG resistance genes, in particular  
786 aph(2'')-Ib and an aadE-like gene (Buelow et al., 2014).

## 787 **8. Impact of resistance on animal health**

788 AGs are important for the therapy of common infections and are widely used in food producing species  
789 and companion animals. They are categorised as veterinary critically important antibiotics by the OIE.  
790 Loss of efficacy of AGs could have a serious negative impact on animal health and welfare. Although  
791 AGs are very important antimicrobials for treatment of animal infections, they are seldom the sole  
792 alternative. In horses, gentamicin is one of the few options for Gram-negative infections. Alternative  
793 treatment options are trimethoprim/sulphonamide combinations (TMPS), 3<sup>rd</sup>- and 4<sup>th</sup>-generation  
794 cephalosporins and fluoroquinolones, but the latter two antimicrobials should also be used restrictively  
795 and resistance to TMPS is common among Gram-negative bacteria. In pigs, AGs are important drugs  
796 for the treatment of post-weaning diarrhoea. Alternatives are tetracycline, trimethoprim-sulphonamide  
797 combinations and ampicillin/amoxicillin, but the prevalence of resistance among *E. coli* to these  
798 antimicrobials is high. Other alternatives include colistin or quinolones. For *Pseudomonas* infections  
799 AGs are one of the few treatment options. In companion animals AGs are used to treat ear and eye  
800 infections caused by *Pseudomonas* spp. by topical application of drops or ointments. For such topical  
801 applications, alternatives include polymyxins and fluoroquinolones. For systemic treatment of  
802 *Pseudomonas* infections, fluoroquinolones are one of the few other treatment options and the use of  
803 this class of antimicrobials should be restricted to conditions where no alternative treatment options are  
804 available.

## 805 **9. Impact of resistance on human health**

806 All AGs (including streptomycin, neomycin and kanamycin), with the exception of the aminocyclitol  
807 spectinomycin, are categorized as "critically important" antimicrobials for human medicine by WHO,  
808 whereas spectinomycin is categorized as "important" as it is not the sole or one of the limited  
809 treatment options for a serious human disease nor is it used to treat diseases caused by either: (1)  
810 organisms that may be transmitted to humans from non-human sources or, (2) human diseases  
811 caused by organisms that may acquire resistance genes from non-human sources (ref WHO). AGs are  
812 most often used in combination with beta-lactams in the empirical treatment of a broad range of life-  
813 threatening infections in humans. Nephrotoxicity and ototoxicity and the discovery of less toxic  
814 antimicrobials in recent decades has limited the use of AGs in human medicine (Poulikakos and  
815 Falagas, 2013). High levels of resistance and multidrug-resistance in certain bacteria to other  
816 antimicrobials, however, have resulted in renewed interest in the AGs.

817 The increasing prevalence of multidrug-resistance in Gram-negative bacteria such as  
818 Enterobacteriaceae, *P. aeruginosa* and *A. baumannii* due to the accumulation of unrelated resistance

819 mechanisms (e.g. to  $\beta$ -lactams and AGs) has resulted in the development of new synthetic  
820 compounds(e.g. plazomicin), which are less susceptible to AG-modifying enzymes (Poulikakos and  
821 Falagas, 2013).

822 To date, extended-spectrum  $\beta$ -lactamases (ESBLs) conferring resistance to broad-spectrum  
823 cephalosporins, carbapenemases conferring resistance to carbapenems, and 16S rRNA methylases  
824 conferring resistance to all clinically relevant AGs are the most important causes of concern (Potron et  
825 al., 2015). In recent years, the global dissemination of Enterobacteriaceae, including *Salmonella* spp.,  
826 that co-produce 16S-rRNA methylases and carbapenemases such as NDM-1 metallo- $\beta$ -lactamase (MBL)  
827 is becoming a serious threat to human health. The resistance genes are often co-located on the same  
828 plasmid. Although 16s rRNA methylases are mainly reported from human clinical isolates, *armA*, *rmtB*  
829 and *rtmC* have also been found in isolates from pets and farm animals (Wachino and Arakawa, 2012).  
830 In addition to 16s rRNA methylases, resistance to aminoglycosides in both Gram-positive and Gram-  
831 negative clinical isolates is often related to the production of modifying enzymes of several classes. In  
832 countries using an AG combined with penicillin as empirical treatment of sepsis, increasing resistance  
833 will result in a shift to applying more resistance-driving options and thereby lead to even more  
834 resistance. It should be noted, however, that a systematic review assessed mortality, treatment  
835 failures and antimicrobial resistance by comparing beta-lactam monotherapy versus any combination  
836 of a beta-lactam with an AG for human cases of blood stream infections. The authors concluded that  
837 the addition of an AG to beta- lactams for sepsis should be discouraged, since mortality rates were not  
838 improved and the addition of AGs considerably increased the risk for nephrotoxicity (Paul et al., 2006).

839 Furthermore, besides infections with multidrug-resistant Enterobacteriaceae, *Pseudomonas* spp. and  
840 *Acinetobacter* spp., multidrug-resistant tuberculosis and enterococcal endocarditis are among the  
841 diseases for which availability of AGs is critically important due to few alternatives (EMA, 2014). For  
842 enterococcal endocarditis ampicillin combined with gentamicin has long been considered the regimen of  
843 first choice, but during the last decade the combination of ampicillin with ceftriaxone has been shown  
844 to be equally effective (Falcone et al., 2015).

845 In conclusion, AGs are important drugs for the treatment of infections with multidrug-resistant Gram-  
846 negative bacteria and multidrug-resistant tuberculosis, but they are seldom the only therapeutic  
847 option.

848

## 849 **10. Transmission of resistance and determinants between** 850 **animals and humans**

851 According to the AMEG answers to the request for scientific advice on the impact on public health and  
852 animal health of the use of antibiotics in animals, there are three categories of antimicrobials:  
853 category 1 are antimicrobials used in veterinary medicine where the risk for public health is currently  
854 estimated low or limited, category 2 are antimicrobials where the risk for public health is currently  
855 estimated higher, category 3 includes antimicrobials currently not approved for use in veterinary  
856 medicine.

857 AGs are frequently used in veterinary and human medicine and resistance has emerged. Resistance  
858 can be due to chromosomal mutations, but resistance determinants are often located on mobile  
859 elements such as transposons, integrons and plasmids. The same resistance genes have been found in  
860 isolates from animals and humans (García et al., 2014; Wendlandt et al., 2013a; Wendlandt et al.,  
861 2013b). In addition, resistance to AGs has been found in bacteria that can cause foodborne infections  
862 in humans, such as *Salmonella* spp. and *Campylobacter* spp., although AGs are generally not used to  
863 treat *Salmonella* or *Campylobacter* infections in humans. Antibiotic resistance in several *Salmonella*  
864 *enterica* serovars is due to genomic islands carrying a class 1 integron, which carries the resistance  
865 genes. *Salmonella* genomic island 1 (SGI1) was found in *S. enterica* serovar Typhimurium DT104  
866 isolates, which are resistant to ampicillin, chloramphenicol, florfenicol, streptomycin, spectinomycin,  
867 sulfonamides and tetracycline. Several *Salmonella* serovars have since been shown to harbor SGI1 or  
868 related islands. SGI1 is an integrative mobilizable element and can be transferred experimentally into  
869 *E. coli* (Hall, 2010). Co-selection to all these antimicrobials can potentially result from the use of AGs if  
870 SGI1 is present.

871 Livestock-associated MRSA CC398 (LA-MRSA) isolates from veterinarians in Belgium and Denmark  
872 were often resistant to gentamicin, kanamycin and tobramycin mediated by *aac* (6')-*aph*(2a") or *aadC*  
873 and LA-MRSA carriage was significantly associated with contact with livestock (Garcia-Graells et al.,  
874 2012). This indicates that LA-MRSA resistant to AGs can be transmitted between animals and humans.

875 In humans, AGs are mostly used for infections caused by bacteria that are not transmitted via food or  
876 contact with animals. Enterobacteriaceae and enterococci can, however, be transmitted between  
877 animals and humans. AGs are used for treatment of zoonotic infections such as tuberculosis,  
878 brucellosis and tularaemia. It should be noted that even bacteria causing human infections not directly  
879 linked to animals may acquire resistance determinants from bacteria with zoonotic potential. Recently  
880 carbapenem-resistant *P. aeruginosa* isolates, with additional resistances to all fluoroquinolones, AGs,  
881  $\beta$ -lactams and some even non-susceptible to colistin, were found in Ohio. The isolates contained the  
882 metallo-beta-lactamase gene *bla*<sub>VIM-2</sub> within a class 1 integron. Genomic sequencing and assembly  
883 revealed that the integron was part of a novel 35-kb region that also included a Tn501-like transposon  
884 and *Salmonella* genomic island 2 (SGI2)-homologous sequences indicative of a recombination event  
885 between *Salmonella* spp. and *P. aeruginosa* (Perez et al., 2014). The indirect risk from the use of AGs  
886 in food animals should therefore be taken into account in determining risk profiles.

887 Extended-spectrum or plasmidic AmpC beta-lactamase producing Enterobacteriaceae are widely  
888 distributed among human and animal populations. Transmission of ESBL/pAmpC-*E. coli* from animals  
889 to humans can potentially occur by direct contact, through the food chain or the environment.  
890 Evidence for clonal transmission of ESBL-producing *E. coli* between humans and broilers was found on  
891 conventional broiler farms, and horizontal gene transfer was suspected on both conventional and  
892 organic farms (Huijbers et al., 2014; Huijbers et al., 2015). ESBL- and carbapenemase-encoding

893 plasmids frequently bear resistance determinants for other antimicrobial classes, including AGs and  
894 fluoroquinolones, a key feature that fosters the spread of multidrug resistance in Enterobacteriaceae  
895 (Ruppé et al., 2015).

896 The prevalence 16S rRNA methylase gene *rmtB* in Enterobacteriaceae isolates from pets in China was  
897 high. *rmtB* was detected in 69/267 isolates, most of which were clonally unrelated. The coexistence of  
898 the *rmtB* gene with the *bla*<sub>CTX-M-9</sub> group genes on the same plasmid was found (Deng et al., 2011).  
899 Although transmission between animals and humans was not studied, the location of resistance  
900 determinants on plasmids indicates that transmission could potentially occur.

901 The risk of transmission of multidrug-resistant tuberculosis from animals to humans is limited, as the  
902 main resistance mechanism for Mycobacteria is chromosomal mutation. In addition, tuberculosis in  
903 humans is mainly caused by *M. tuberculosis*, which is transmitted from humans-to-humans. Bovine  
904 tuberculosis is a reportable disease in EU MS and has been eradicated in many EU MS. During the  
905 years 2006–2012, the proportion of cattle herds infected or positive for *M. bovis* in the EU (all MSs)  
906 was at a very low level and ranging from 0.37 % in 2007 to 0.67 % in 2012 (EURL for Bovine  
907 Tuberculosis, website, last accessed: 2017).

908 Altogether, these data show that the probability of transfer of AG resistance from animals to humans is  
909 high (Table 4).

910 Table 4. Classification of AGs according to their probability of transfer of resistance genes and resistant bacteria

Substance	Prevalence of resistance *	Mobile genetic element-mediated transfer of resistance <sup>a</sup>	Vertical transmission of resistance gene(s) <sup>b</sup>	Co-selection of resistance <sup>c</sup>	Potential for transmission of resistance through zoonotic and commensal food-borne bacteria <sup>d</sup>	Evidence of similarity of resistance: genes / mobile genetic elements / resistant bacteria <sup>e</sup>	Overall probability of resistance transfer
kanamycin, gentamicin, amikacin, apramycin, tobramycin, paromomycin, framycetin, neomycin	low	3	3	3	3	3	High
spectinomycin, (dihydro)streptomycin,	high	3	3	3	3	3	High

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912  
913

<sup>a</sup>Mobile genetic element-mediated transfer of resistance. Defined as a resistance gene that is transmitted by means of mobile genetic elements (horizontal transmission of the gene occurs). Probability (1 to 3): 1, no gene mobilization described; 2, gene is exclusively on the core bacterial chromosome; 3, gene is on a mobile genetic element, e.g. plasmid.

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916

<sup>b</sup>Vertical transmission of resistance gene. Defined as the vertical transfer of a resistance gene through the parent to the daughter bacteria in a successful, highly disseminated resistant clone of bacteria through a bacterial population, e.g. *E. coli* ST131 clone, MRSP CC(71) clone, MRSA ST398 clone. Probability (1 to 3): 1, no vertical transmission of gene described as associated with in a particular successful resistant clone; 2, gene is exclusively on the core bacterial chromosome in a particular successful resistant clone; 3, gene is on a mobile genetic element, e.g. plasmid, in a particular successful resistant clone.

917  
918

<sup>c</sup>Co-selection of resistance. Defined as selection of resistance which simultaneously selects for resistance to another antimicrobial. Probability (1 to 3): 1, no co-mobilization of the gene or risk factor described; 2, gene is either co-mobilized or a risk factor has been described; 3, gene is co-mobilized and a risk factor has been described.

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<sup>d</sup>Transmission of resistance through zoonotic and commensal food-borne bacteria. Defined as transmission of resistance through food-borne zoonotic pathogens (e.g. *Salmonella* spp., *Campylobacter* spp., *Listeria* spp., *E. coli* VTEC) or transmission of resistance through commensal food-borne bacteria (e.g. *E. coli*, *Enterococcus* spp.). Probability (1 to 3): 1, no transmission of resistance through food-borne zoonotic pathogens or commensal food-borne bacteria; 2, transmission of resistance through food-borne zoonotic pathogens or commensal food-borne bacteria; 3, transmission of resistance through food-borne zoonotic pathogens and commensal food-borne bacteria.

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<sup>e</sup>Evidence of similarity of resistance: genes/mobile genetic elements/resistant bacteria. Genes - Defined as similar resistance gene detected in bacterial isolates of animal and human origin; Mobile genetic elements - Defined as a similar resistance mobile genetic element detected in bacterial isolates of animal and human origin; Resistant bacteria - Defined as a similar bacterium harboring a resistance gene (either chromosomally or mobile genetic element-encoded) of animal and human origin. Probability (1 to 3): 1, unknown resistance similarity; 2, genes or mobile genetic elements or resistant bacteria similar between animals and humans; 3, genes and mobile genetic elements similar between animals and humans; 4, genes and mobile genetic elements and resistant bacteria similar between animals and humans.

926

\* Based on surveillance data from foodborne pathogenic and commensal bacteria (EFSA/ECDC, 2017)

## 927 11. Discussion

928 AGs are bactericidal antibiotics that act by impairing bacterial protein synthesis. Many AGs are used in  
929 both veterinary and human medicine, except for apramycin, which is only used in animals. In European  
930 livestock and in companion animals, AGs are used for the treatment of a variety of different conditions.

931 In animals, AGs are administered orally, topically on the skin, as intramammary or intrauterine  
932 preparation, as ear or eye drops or as injectables. In veterinary medicine, the sales of AGs accounted  
933 for 3.5% of the total sales (in PCU) for food producing species from 26 EU/EEA member states in 2013.  
934 The the most commonly sold AGs were neomycin, dihydrostreptomycin and spectinomycin: together  
935 they accounted for 84% of the total sales of AGs, while sales of gentamicin account for only 3%.

936 In human medicine, AGs are used primarily in infections involving aerobic, Gram-negative bacteria,  
937 such as *Pseudomonas*, *Acinetobacter*, and Enterobacteriaceae and in combination with beta-lactams for  
938 the treatment of endocarditis caused by enterococci or streptococci. Newer AGs, such as gentamicin,  
939 amikacin and tobramycin, are more often used in EU MS, especially as injectables, while older AGs  
940 such as streptomycin are rarely used and neomycin is only used orally and for topical application.

941 AGs are concentration-dependent antimicrobial agents, and optimal parenteral dosing involves  
942 administration of high doses with long dosing intervals. Most injectable or oral products in veterinary  
943 medicine are administered for 3-5 days. Some products, however, are licensed for usage for more than  
944 7 days, some for in-feed use even for 21 or 28 days. Treatment durations longer than 7 days and  
945 parenteral administrations more than once daily should be reviewed. Any indications for treatment of  
946 salmonella infections in chickens should be in line with EC regulations and take account of the public  
947 health risk.

948 Interpretation of susceptibility testing is impaired by the lack of veterinary breakpoints for most AGs.  
949 Veterinary breakpoints should therefore be established.

950 The amount of AGs used in animals as well as humans varies significantly for those EU/EEA countries  
951 for which there are data on consumption. Reasons for these differences are unknown in veterinary  
952 medicine, but the sales of AGs as a percentage of the total antimicrobial sales (mg/PCU) for food  
953 producing animals in 29 EU countries was just 3.5% in 2014.

954 The usage of AGs in animals and humans is associated with the occurrence of resistance. Resistance  
955 can be due to chromosomal mutations, but resistance determinants are more often located on mobile  
956 elements. Resistance can be transmitted between animals and humans through clonal transfer of  
957 pathogenic bacteria, e.g. Livestock associated -MRSA, *Salmonella* spp. or *Campylobacter* spp., but  
958 resistance genes can also be transferred horizontally on mobile elements between bacteria and even  
959 between different bacterial species. On these mobile elements, genes mediating resistance to different  
960 AGs and also to other classes of antimicrobials are often present, facilitating co-selection of AG  
961 resistance by the use of other antimicrobials. Resistance mechanisms are complex and differ between  
962 the AG molecules and also between bacterial species. Cross-resistance to several AGs by a single  
963 mechanism/plasmid does occur, but generally there is no complete cross resistance. The genes  
964 encoding resistance to AGs like streptomycin or spectinomycin are generally different from those of  
965 gentamicin or tobramycin. With some exceptions, resistance to streptomycin and spectinomycin is  
966 generally common in isolates from animals, including those with zoonotic potential, while resistance to  
967 gentamicin, amikacin and kanamycin is still uncommon.

968 Similar resistance genes and mobile elements have been found in bacteria from humans and animals.  
969 Resistance to AGs has been found in bacteria that can cause foodborne infections in humans, such as

970 *Salmonella* spp. and *Campylobacter* spp. as well as in potentially zoonotic bacteria such as (LA)-MRSA,  
971 although in humans these infections would not be generally treated with AGs; *E. coli* and enterococci,  
972 however, can also carry the same AG resistance genes and can be transmitted between animals and  
973 humans. AGs are used in humans for the treatment of *E. coli* and enterococcal infections. In addition,  
974 as resistance genes are often present on mobile genetic elements, they can potentially be transmitted  
975 from zoonotic bacteria to human pathogens, e.g. from *Salmonella* to *Klebsiella* or other Gram-negative  
976 bacteria. Therefore, the probability of transmission of AG resistance from animals to humans is  
977 regarded high. Although the prevalence of resistance depends on the bacterial species investigated and  
978 the EU MS, the use of AGs in food-producing animals may in general have an impact on human health.  
979 Since very few new and effective antimicrobials for the treatment of infections due to multidrug-  
980 resistant Gram-negative bacteria are likely to be launched in the near future, there is an urgent need  
981 to implement strategies that may slow down the development of acquired resistance (Potron et al.,  
982 2015).

983 Generally, the risk from oral products used mostly to treat enteric infections in pigs, chickens and  
984 calves (apramycin, neomycin, streptomycin, spectinomycin, gentamicin) is much higher, as these  
985 products are used as mass medication and as AGs are not absorbed from the gut, the gut flora is  
986 exposed to considerable selective pressure. Resistance to streptomycin is common in enteric indicator  
987 bacteria such as *E. coli* and *Enterococcus* species, but fortunately the percentage of resistance to  
988 gentamicin in these bacteria is still relatively low, most likely due to differences in the resistance  
989 mechanisms and differences in the amounts used in veterinary medicine.

990 The risk for the emergence of resistance in humans from the use of topical products including drops  
991 used to treat eye and ear infections (mainly *Pseudomonas* infections) in companion animals is  
992 generally regarded as low, as individual animals are treated and this local route of administration does  
993 not result in selective pressure on the gut flora. This also holds for the use of AGs as intramammaries  
994 (mainly neomycin; streptomycin and dihydrostreptomycin) for the treatment of mastitis in cattle,  
995 although the use of intramammaries as dry cow therapy might result in a somewhat higher risk as  
996 more individuals are treated (unless selective treatment is practised) and long acting preparations are  
997 used. The risk for the emergence of resistance in humans from the use of AGs (streptomycin,  
998 gentamicin) as injectables will generally be lower if animals are treated individually rather than as a  
999 group. The risk for humans will also be higher when gentamicin is used, as this AG is also commonly  
1000 used in humans.

1001 In veterinary medicine, AGs are one of the few treatment options for *Pseudomonas* infection and for  
1002 infections with Gram-negative bacteria in horses.

1003 In human medicine, AGs are important for the treatment of infections with *Pseudomonas* spp.,  
1004 *Acinetobacter* spp. and multidrug-resistant Enterobacteriaceae, however they are rarely the sole  
1005 treatment option. The risk of transmission of resistant Enterobacteriaceae to humans from non-human  
1006 sources is regarded high. AGs have been considered critical for humans as a sole or one of limited  
1007 treatment options for enterococcal endocarditis. For enterococcal endocarditis and bacteraemia,  
1008 however, alternative treatment options are now available and there are studies indicating that mono-  
1009 therapy with beta-lactams is as effective as combination therapy with AGs, with less toxicity for  
1010 patients. Therefore, AGs are rarely the sole treatment option in human or veterinary medicine. In the  
1011 AMEG report the potential risk level of AGs included consideration of the risk of transmission of  
1012 resistant *Enterococcus* spp. and Enterobacteriaceae to humans from non-human sources. Molecular  
1013 epidemiological studies based on multi-locus sequence typing (MLST) revealed that the vast majority  
1014 of *E. faecium* isolates causing clinical infections and nosocomial outbreaks in humans belong to a  
1015 globally dispersed polyclonal subpopulation, genotypically different from *E. faecium* strains colonising

1016 animals and healthy humans in the community. There was a significant discrepancy in accessory gene  
1017 content between hospital and community ampicillin-resistant *E. faecium* that includes putative  
1018 virulence and antimicrobial resistance genes, and indicates that if zoonotic transfer occurs, it only  
1019 occurs infrequently (de Regt et al., 2012). For *E. faecalis*, however, the same MLST types can be  
1020 detected in isolates from food, animals and patients with clinical infections and therefore the zoonotic  
1021 potential is higher (Hammerum, 2012). For *E. coli*, Salmonella species and LA-MRSA, the risk of  
1022 transmission of resistance determinants between animals and humans is regarded high. AGs are also  
1023 important for the treatment of multidrug-resistant tuberculosis. The risk of transfer of resistance  
1024 between animals and humans is regarded low, as resistance in Mycobacteria is due to chromosomal  
1025 mutations and most human cases in EU MS are caused by *Mycobacterium tuberculosis*, which is mainly  
1026 transmitted from humans-to-humans. Bovine tuberculosis is rare in Europe overall.

1027 If AGs were no longer available for veterinary medicine then it could be speculated that other  
1028 antimicrobials would replace their use. Alternatives to AGs for the treatment of some multidrug-  
1029 resistant Gram-negative infections in animals include antimicrobials that are critically important for the  
1030 treatment of human infections, such as fluoroquinolones and colistin. For a complete risk assessment,  
1031 the consequences of the use of these alternatives instead of AGs should also be taken into account, but  
1032 this is beyond the scope of this reflection paper. In addition, as most AG resistance genes are located  
1033 on mobile genetic elements which often also harbour genes mediating resistance to other classes of  
1034 antimicrobials and thus facilitate co-selection, prudent use of all antimicrobials in human and  
1035 veterinary medicine is of great importance.

## 1036 **12. Conclusion**

1037 Considering the AMEG criteria, veterinary-authorized AGs would be placed in Category 2 given (i) their  
1038 importance in human medicine and (ii) the high potential for transmission of resistance determinants  
1039 between animals and humans and the potential for co-selection of resistance as described by the  
1040 AMEG. However, according to the CVMP, AGs have a lower risk profile compared to fluoroquinolones  
1041 and 3<sup>rd</sup>- and 4<sup>th</sup>-generation cephalosporins as they are used for a lower absolute number of individuals  
1042 affected by all diseases for which these antimicrobials are one of few therapies available, and they are  
1043 used less often for other infections than 3<sup>rd</sup>- and 4<sup>th</sup>-generation cephalosporins and fluoroquinolones in  
1044 human medicine (WHO). Without precluding the AMEG decision, it is recommended that veterinary-  
1045 authorized AGs could be placed in Category 2, although the AMEG could give consideration to a further  
1046 stratification of the categorization. Those AGs that are not authorised for use in veterinary medicine  
1047 would remain in the AMEG's category 3 pending further risk assessment.

1048

## 1049 13. References

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