

- 1 4 February 2019
- 2 EMA/CVMP/CHMP/682198/2017 3 Committee for Medicinal Product
- 3 Committee for Medicinal Products for Veterinary use (CVMP)
- 4 Committee for Medicinal Products for Human Use (CHMP)

# 5 Answer to the request from the European Commission for

- 6 updating the scientific advice on the impact on public
- 7 health and animal health of the use of antibiotics in
- <sup>8</sup> animals Categorisation of antimicrobials
- 9 Draft

Agreed by the Antimicrobial Advice ad hoc Expert Group (AMEG)	29 October 2018
Adopted by the CVMP for release for consultation	24 January 2019
Adopted by the CHMP for release for consultation	31 January 2019
Start of public consultation	5 February 2019
End of consultation (deadline for comments)	30 April 2019

#### 10

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## 11

Keywords antimicrobials, antimicrobial resistance, categorisation

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14	updating the scientific advice on the impact on public	
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## **1. Summary assessment and recommendations**

The first Antimicrobial Advice *ad hoc* Expert Group (AMEG) categorisation considered the risk to public health from antimicrobial resistance (AMR) due to the use of antimicrobials in veterinary medicine. The work focussed on antimicrobials included in the World Health Organisation's (WHO) list of critically important antimicrobials<sup>1</sup> (CIAs). The categorisation was based primarily on the need for a particular antimicrobial (sub)class in human medicine, and the risk for spread of resistance from animals to humans.

57 The categorisation was published in 2014 (EMA/AMEG, 2014) wherein the AMEG proposed to classify 58 the antimicrobials from the WHO CIA list in three different categories:

- Category 1 as antimicrobials used in veterinary medicine where the risk for public health is
   estimated as low or limited,
- Category 2 as antimicrobials used in veterinary medicine where the risk for public health is
   estimated higher and
- Category 3 as antimicrobials not approved for use in veterinary medicine.

The categorisation for colistin was reviewed in an updated advice published by the European MedicinesAgency (EMA) in 2016 (EMA/AMEG, 2016).

66 In July 2017, the European Commission (EC) asked the EMA to update its 2014 advice regarding the

67 categorisation of antimicrobials to take account of experience gained, in particular the reflection papers

- 68 recently published by the EMA on the use of aminoglycosides and aminopenicillins in animals in the
- 69 European Union, the risk of resistance development associated with their use and potential
- 70 consequential impacts on human and animal health.
- 71 During this review, the AMEG considered additional criteria that could be taken into account for the
- 72 categorisation of antimicrobials. Hence in the updated categorisation proposal, more emphasis is
- 73 placed on the availability of alternative antimicrobials in veterinary medicine. In addition, the ranking
- has been refined with the addition of a further (fourth) category. To harmonise with other lists, the
- order of the categories, in terms of level of risk, has been reversed compared to the first AMEG report.
- 76 Further, those antimicrobial classes which were not considered in the 2014 AMEG advice have been
- considered in this updated advice, and ranked according to the updated categorisation proposal.
- A separate listing is provided which suggests routes of administration and types of formulation which,
   in general, are preferred in terms of their estimated impact on the selection of AMR.
- The AMEG proposes to classify the antimicrobials in four different categories, from A to D. For communication purposes, key action words have been attributed for each category.
- 82 **Category A** ("Avoid") corresponds to Category 3 in the first AMEG report, and includes antimicrobial
- 83 classes not currently authorised in veterinary medicine in the EU. In the absence of established
- 84 maximum residue limits for foodstuff of animal origin, use of these classes of AM in food-producing
- 85 animals is prohibited and they may only be administered to individual companion animals
- 86 exceptionally, in compliance with the prescribing "cascade".
- 87 **Category B** ("Restrict") corresponds to Category 2 in the first AMEG report, including the substances
   88 listed as highest priority CIAs (HPCIAs) by the WHO with the exception of macrolides and those classes

<sup>&</sup>lt;sup>1</sup> For this document "antimicrobials" is defined as "active substance of synthetic or natural origin which destroys microorganisms, suppresses their growth or their ability to reproduce in animals or humans". In this context, antivirals, antiparasitics and disinfectants are excluded from the definition.

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- included in Category A. Thus, this category includes quinolones, 3<sup>rd</sup>- and 4<sup>th</sup>-generation cephalosporins
  and polymyxins. For these antimicrobials, the risk to public health resulting from veterinary use needs
  to be mitigated by specific restrictions.
- 92 These restricted antimicrobials should only be used for the treatment of clinical conditions when there
- 93 are no alternative antimicrobials in a lower category that could be effective. Especially for this
- 94 category, use should be based on the results of antimicrobial susceptibility testing, whenever possible.
- 95 In the first AMEG scientific advice (EMA/AMEG, 2014), aminoglycosides and the subclass of penicillins,
- 96 aminopenicillins, were temporarily placed in Category 2, pending more in-depth risk profiling. The
- 97 Committee for Medicinal Products for Veterinary Use (CVMP)'s reflection papers on aminoglycosides
- 98 (EMA/CVMP/AWP, 2018b) and aminopenicillins (EMA/CVMP/AWP, 2018a), in draft) recognise that in
- 99 accordance with the categorisation criteria in the first AMEG report, all veterinary authorised
- aminoglycosides and amoxicillin-clavulanate combinations would be placed in Category 2. However, as
- 101 the use of these antimicrobials in veterinary medicine was considered to present a lower risk to human
- 102 health compared to quinolones and 3<sup>rd</sup>- and 4<sup>th</sup>-generation cephalosporins, the CVMP recommended
- 103 that a further stratification of the original AMEG categorisation should be considered. Further, it was
- suggested that the addition of an intermediate category would improve the utility of the categorisation
- as a risk management tool by avoiding the counterproductive outcome of too many antimicrobialsbeing placed in the higher risk category.
- 107 **Category C** ("Caution") has been added as an intermediate category, taking account of the
- 108 considerations above. This category includes individual antimicrobial classes listed in different
- 109 categories by WHO, including the HPCIA macrolides. For those substances proposed for inclusion in this
- 110 category, there are in general alternatives in human medicine in the EU but there are few alternatives
- 111 in veterinary medicine for certain indications.
- 112 Antimicrobial classes that may select for resistance to a substance in Category A through specific
- 113 multiresistance genes have also been placed in this category.
- 114 These antimicrobials should only be used when there is no substance in Category D that would be 115 effective.
- 116 **Category D** ("Prudence") is the lowest risk category. While the risk to public health associated with 117 the use in veterinary medicine of substances included in this category is considered low, a number of 118 the substances in this category are listed as WHO CIAs (aminopenicillins, natural penicillins and 119 isoxazolylpenicillin). It is acknowledged that these antimicrobials are not devoid of negative impact on 120 resistance development and spread, in particular through co-selection. Therefore, while there are no 121 specific recommendations to avoid use of Category D substances, there is a general recommendation 122 that prudent use principles should be adhered to in everyday practice to keep the risk from use of 123 these classes as low as possible. Unnecessary use and unnecessarily long treatment periods should be 124 avoided and group treatment should be restricted to situations where individual treatment is not
- 125 feasible.
- 126 The risk management measures applied to the individual AMEG categories should be seen as
- 127 complementary to the provisions in the new regulation on veterinary medicines (Official Journal of the128 European Union, 2019) in relation to use of antimicrobials for prophylaxis, metaphylaxis and under the
- 129 "cascade".
- 130 This categorisation does not directly translate into a treatment guideline for use of antimicrobials in 131 veterinary medicine, but can be used as a tool by those preparing guidelines. In veterinary medicine,

- 132 the variety of animal species, the different routes of administration (from intramammary treatment of
- 133 individual cows to treatment of many hundreds of fish by in-feed medication) and diversity of
- 134 indications are all factors that have to be taken into account for treatment guidelines. Further, types of
- production systems, the presence of different diseases and occurrence of antimicrobial resistance may
- 136 differ between regions. Therefore, treatment guidelines need to be regionally or even locally developed
- 137 and implemented. Development and implementation of evidence-based national and regional
- 138 treatment guidelines are encouraged.
- A summary table specifying the categorisation for each class or subclass of antimicrobials is providedbelow.
- 141 **Table 1.** Summary of the AMEG categorisation

AMEG Categories	Antimicrobial class, subclasses, substances
Category A ("Avoid")	<ul> <li>Amidinopenicillins</li> <li>Carbapenems and other penems</li> <li>Cephalosporins, Other cephalosporins and penems (ATC code J01DI)</li> <li>Glycopeptides</li> <li>Glycylcyclines</li> <li>Lipopeptides</li> <li>Monobactams</li> <li>Oxazolidinones</li> <li>Penicillins: carboxypenicillins and ureidopenicillins combinations with β-lactamase inhibitors</li> <li>Phosphonic acid derivates (e.g. fosfomycin)</li> <li>Pseudomonic acid</li> <li>Riminofenazines</li> <li>Streptogramins</li> <li>Sulfones</li> <li>Drugs used solely to treat tuberculosis or other mycobacterial diseases</li> </ul>
Category B ("Restrict")	<ul> <li>Cephalosporins, 3rd- and 4th-generation</li> <li>Polymyxins (e.g. colistin)</li> <li>Quinolones (fluoroquinolones and other quinolones)</li> </ul>
Category C ("Caution")	<ul> <li>Aminoglycosides and aminocyclitol</li> <li>Aminopenicillins in combination with β-lactamase inhibitors (e.g. amoxicillin-clavulanic acid)</li> <li>Amphenicols (florfenicol &amp; thiamphenicol)</li> <li>Cephalosporins, 1st- and 2nd-generation and cephamycins</li> <li>Macrolides</li> <li>Lincosamides</li> <li>Pleuromutilins</li> <li>Rifamycins</li> </ul>
<b>Category D</b> ( <i>"Prudence"</i> )	<ul> <li>Aminopenicillins, without β-lactamase inhibitors</li> <li>Cyclic polypeptides (bacitracin)</li> <li>Nitrofuran derivatives (e.g. nitrofurantoin)*</li> <li>Nitroimidazoles*</li> <li>Penicillins: Anti-staphylococcal penicillins (β-lactamase-resistant penicillins )</li> </ul>

AMEG Categories	Antimicrobial class, subclasses, substances			
	<ul> <li>Penicillins: Natural, narrow spectrum penicillins (β-lactamase-sensitive penicillins)</li> </ul>			
	<ul> <li>Steroid antibacterials (fusidic acid)*</li> </ul>			
	Sulfonamides, dihydrofolate reductase inhibitors and combinations			
	Tetracyclines			
	(* Authorised for companion animals only)			

143 After this AMEG scientific advice is finally adopted in 2019, an infographic and other communication

144 materials for the specific purpose of publicising the categorisation will be developed by the EMA.

## 145 **2. Introduction**

### 146 **2.1. Background**

The European Commission (EC) requested in April 2013 a scientific advice from the European
Medicines Agency (EMA) on the impact of the use of antibiotics in animals on public health and animal
health and measures to manage the possible risk to humans.

150 The scientific advice was prepared by the Antimicrobial Advice *ad hoc* Expert Group (AMEG) and a 151 response to the EC request was published by the EMA in December 2014 (EMA/AMEG, 2014).

152 One of the questions requested a ranking of classes or groups of antibiotics according to the relative

153 importance for their use in human medicine. When the categorisation of antimicrobials (answer to

question 2) was published, the necessity of further, more in-depth risk-profiling of aminoglycosides

and aminopenicillins was highlighted. The Committee for Medicinal Products for Veterinary Use (CVMP),

156 with the scientific input of its Antimicrobials Working Party (AWP), is in the process of finalising its

157 considerations on these classes of antimicrobials.

158 Following the discovery of *mcr-1*, a horizontally transferable resistance gene identified in bacteria of

159 food animal origin (Liu et al., 2015), the EC requested a re-assessment of the earlier advice on the

160 impact of the use of colistin products in veterinary medicine on public and animal health. The updated

- advice on colistin, published by the EMA in 2016, resulted in a reclassification of this substance to thehigher risk category (category 2) of the AMEG classification (EMA/AMEG, 2016).
- 163 In July 2017, the EC asked the EMA to update its advice published in 2014. Regarding the 164 categorisation of antimicrobials, the EC requested that the AMEG review the original classification and
- 165 update as necessary taking account of the following specific points:
- Categorisation of aminoglycosides and penicillins;
- Further refinements of the criteria for the categorisation (e.g. including route of administration);
- 168 Improved communication of the categorisation;
- Consideration of additional categorisation for antimicrobials categorised by the World Health
   Organisation (WHO) as highly important and important (in addition to the critically important
   antimicrobials);

- Consideration of other recent work of the WHO on classification of antimicrobials and pathogens
   (e.g. the 20th edition of the WHO Model List of Essential Medicines and the WHO Global priority list
- 174 of antibiotic-resistant bacteria to guide research, discovery, and development of new antibiotics);
- Consideration of any other relevant work in this area (e.g. OIE list of antimicrobial agents of veterinary importance).

## 177 2.2. Scope of the response

- 178 The scope of the present document is limited to addressing the European Commission's request to 179 update the 2014 advice on the categorisation of antimicrobials.
- 180 It should be noted that in its most recent request for advice, the EC also requested that the AMEG 181 further elaborate on the 'early hazard characterisation' proposed in its 2014 advice as a means of 182 assessing the risk to public health from AMR for new antimicrobials prior to submission of a marketing 183 authorisation application. The AMEG response to this specific request is published in a separate
- 184 document (EMA/682199/2017).

## **3. Considerations for the response**

## 186 **3.1.** Risk to public health

187 The risk to public health from the development, emergence and spread of resistance consequent to use

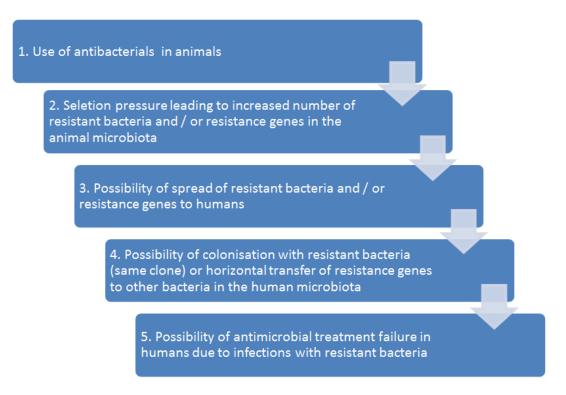
188 of antimicrobials (AMs) in veterinary medicine is dependent on multiple risk factors (Graveland et al.,

189 2010; Persoons et al., 2011). Figure 1 summarises the chain of events that may follow from use of

antimicrobials in animals resulting in a compromised antimicrobial treatment in humans.

191

**Figure 1.** The chain of events that may follow from use of antimicrobials in animals resulting in compromised antimicrobial treatment in humans



#### 195

- 196 Although lists can be useful tools during risk assessments, the categorisation of AMs according to AMR
- 197 has certain limits. This is mainly because co-selection between similar and also highly different classes
- 198 of antimicrobials, may be present. As an example, co-selection exists between similar compounds such
- as amoxicillin and 3<sup>rd</sup>-generation cephalosporins (Persoons et al., 2012). Another example is
- 200 tetracyclines, which facilitate spread of MRSA in livestock (Price et al., 2012). In other words,
- 201 restrictions on one class alone might not have the desired impact because of co-selection of AMR.

# 3.2. Consideration of other recent work on classification of antimicrobials and pathogens

### 204 **3.2.1. WHO**

### 205 **3.2.1.1.** WHO list of Critically important antimicrobials

- Following two tripartite WHO/FAO/OIE consultations on non-human antimicrobial usage and
  antimicrobial resistance (WHO, 2003; WHO, 2004), WHO has published a list of critically important
  antimicrobial agents for human medicine (WHO, 2005; WHO, 2007; WHO, 2011; WHO, 2012; WHO,
  2016; WHO, 2017a).
- 210 The ranking identifies three categories: Critically Important Antimicrobials (CIA), Highly Important
- 211 Antimicrobials (HIA) and Important Antimicrobials (IA).

- Furthermore, a prioritisation has been performed among CIAs to identify the Highest Priority CriticallyImportant Antimicrobials (HPCIA).
- The HPCIA category includes quinolones, 3<sup>rd</sup> and higher generation cephalosporins, macrolides and ketolides, glycopeptides and polymyxins.
- As noted in the 5<sup>th</sup> Revision of Critically Important Antimicrobials for Human Medicine (WHO, 2017a),
- these lists are intended "to be used as a reference to help formulate and prioritize risk assessment and risk management strategies for containing antimicrobial resistance mainly due to non-human use".
- "The use of this list, in conjunction with the OIE list of antimicrobials of veterinary importance and the
   WHO Model Lists of Essential Medicines, will allow for prioritization of risk management strategies in
- the human sector, the animal sector, and in agriculture, through a coordinated One Health approach."
- 222 **3.2.1.1.1. The WHO list is built on two criteria**
- **Criterion 1.** The antimicrobial class is the sole, or one of limited available therapies, to treat serious bacterial infections in people.
- Criterion 2. The antimicrobial class is used to treat infections in people caused by either: (1)
   bacteria that may be transmitted to humans from non-human sources, or (2) bacteria that may
   acquire resistance genes from non-human sources.
- 228 If both of these criteria are fulfilled the compound or class is regarded as CIA.
- 229 If one of these criteria are fulfilled the compound or class is regarded as HIA.
- 230 If none of these criteria are fulfilled the compound or class is regarded as IA.
- The list of CIAs and HIAs, which meet WHO Criterion 1, is presented with comments specific to the EU in the Annex (Table A1).

#### 233 **3.2.1.1.2.** Criteria of prioritisation among the CIA

- Antimicrobials within the critically important category are further prioritised by WHO.
- 235 The following three criteria are used for prioritisation:
- Prioritization criterion 1: High absolute number of people, or high proportion of use in patients
   with serious infections in health care settings affected by bacterial diseases for which the
   antimicrobial class is the sole or one of few alternatives to treat serious infections in humans.
- Prioritization criterion 2: High frequency of use of the antimicrobial class for any indication in human medicine, or else high proportion of use in patients with serious infections in health care settings, since use may favour selection of resistance in both settings.
- Prioritization criterion 3: The antimicrobial class is used to treat infections in people for which
   there is evidence of transmission of resistant bacteria (e.g. non-typhoidal Salmonella and
- 244 *Campylobacter spp.) or resistance genes (high for E. coli and Enterococcus spp.) from non-human* 245 *sources.*
- Antimicrobial classes that meet all three prioritization criteria (1, 2, and 3) are considered the *highest priority critically important antimicrobials*.

# 3.2.1.2. WHO Guidelines on use of medically- important antimicrobials in food-producing animals

In 2017, WHO published guidelines on use of medically-important antimicrobials in food-producing
animals (WHO, 2017e). These guidelines were developed by the Guideline Development Group (GDG)
using the WHO guideline development process and are based on two systematic reviews using
standard methods and narrative literature reviews by topic experts. The GDG used the GRADE (grading
of recommendations, assessment, development and evaluation) approach to appraise and use the
evidence identified to develop recommendations. The main recommendations are summarised in
Figure 2.

Figure 2. Recommendations in the WHO guidelines on use of medically important antimicrobials in
 food-producing animals<sup>2</sup>

#### Recommendations

- 1 The GDG recommends an overall reduction in use of all classes of medically important antimicrobials in food-producing animals.
- 2 The GDG recommends complete restriction of use of all classes of medically important antimicrobials in food-producing animals for growth promotion.
- 3 The GDG recommends complete restriction of use of all classes of medically important antimicrobials in food-producing animals for prevention of infectious diseases that have not yet been clinically diagnosed.

Specific considerations: when a veterinary professional judges that there is a high risk of spread of a particular infectious disease, use of antimicrobials for disease prevention is justified, if such a judgement is made on the basis of recent culture and sensitivity testing results.

4 a – The GDG suggests that antimicrobials classified as critically important for human medicine should not be used for control of the dissemination of a clinically diagnosed infectious disease identified within a group of food-producing animals. b – The GDG suggests that antimicrobials classified as highest priority critically important for human medicine should not be used for treatment of food-producing animals with a clinically diagnosed infectious disease.

To prevent harm to animal health and welfare, exceptions to recommendations 4a and 4b can be made when, in the judgment of veterinary professionals, bacterial culture and sensitivity results demonstrate that the selected drug is the only treatment option.

#### 259

## 260 **3.2.2. WHO essential substances**

261 The WHO Model Lists of Essential Medicines include medicines needed to treat common infections in

- humans, taking account of their clinical efficacy and safety and cost-effectiveness. Since 1977, WHOupdates the lists every two years.
- Two lists are available: the current versions are the 20<sup>th</sup> WHO Essential Medicines List (EML) and the 6<sup>th</sup> WHO Essential Medicines List for Children (EMLc). Both lists were last updated in March 2017 and can be found on the WHO website (WHO, 2017b).
- As part of the 2017 review, a new categorisation of antibacterials into three groups was proposed:

<sup>&</sup>lt;sup>2</sup> https://aricjournal.biomedcentral.com/articles/10.1186/s13756-017-0294-9

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- ACCESS first and second choice antibiotics for the empiric treatment of most common infectious syndromes;
- WATCH antibiotics with higher resistance potential whose use as first and second choice
   treatment should be limited to a small number of syndromes or patient groups; and
- RESERVE antibiotics to be used mainly as 'last resort' treatment options.
- The WATCH group includes the majority of the highest priority antimicrobials on the list of CIAs forHuman Medicine.
- Of the HPCIAs only polymyxin E (colistin) and 4<sup>th</sup>-generation cephalosporins (e.g. cefipime) are placed
   in the Reserve Group.

# 3.2.3. Global priority list of antibiotic-resistant bacteria to guide research, discovery, and development of new antibiotics

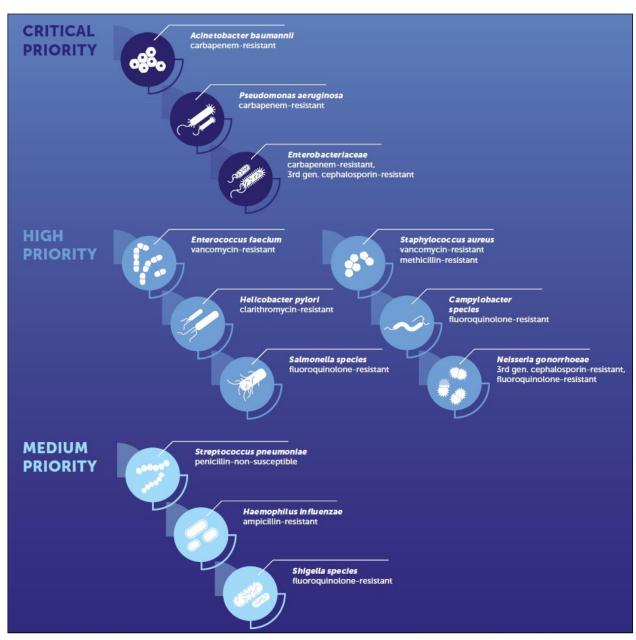
- In 2016, WHO Member States mandated WHO to develop a global priority list of antimicrobial-resistant
  bacteria to guide research and development (R&D) of new and effective antibiotics. The main goal of
  this list is to prioritise funding and facilitate global R&D strategies.
- 282 The global priority list was developed by applying a multi-criteria decision analysis (MCDA) technique,
- 283 which allows the evaluation of different alternatives according to multiple criteria, incorporating both
- expert opinion and evidence-based data in a transparent, explicit, and deliberative fashion. The list was developed in five steps: (a) selection of the antibiotic-resistant bacteria to be prioritised, (b)
- selection of criteria for prioritisation (all-cause mortality, healthcare and community burden,
- prevalence of resistance, 10-year trend of resistance, transmissibility, preventability in hospital and
- community settings, treatability and current pipeline), (c) data extraction and synthesis, (d) scoring of
- alternatives and weighting of criteria by experts (this was done blindly, i.e. based only on the
- characteristics of the antibiotic-resistant bacteria, but without knowing the names of these bacteria),and (e) finalisation of the ranking.
- WHO published a global priority list in December 2017 (Tacconelli et al., 2018; WHO, 2017d). In the list, antibiotic-resistant bacteria are ranked in three groups according to the assessed priority for R&D of new and effective antibiotics: priority 1 – critical, priority 2 – high, and priority 3 – medium (Figure 3) (WHO, 2017c).
- 296 Third-generation cephalosporin-resistant and/or carbapenem-resistant Enterobacteriaceae and
- 297 carbapenem-resistant Acinetobacter baumannii and Pseudomonas aeruginosa were listed among the
- antibiotic-resistant bacteria for which there is a critical need for new effective antibiotics. Vancomycin-
- 299 resistant Enterococcus faecium, methicillin-resistant Staphylococcus aureus (MRSA), as well as
- 300 fluoroquinolone-resistant Campylobacter spp. and Salmonella spp., were listed among antimicrobial-
- 301 resistant bacteria for which R&D of new effective antibiotics is of high priority.

302

303 **Figure 3.** Prioritization of pathogens to guide research and development of new antibiotics (WHO,

304 2017d)





306

## 307 **3.2.4. OIE List of Antimicrobials of Veterinary Importance**

- Following two tripartite WHO/FAO/OIE consultations on non-human antimicrobial usage and
   antimicrobial resistance (WHO, 2003; WHO, 2004), the OIE published a list of antimicrobial agents of
- veterinary importance in 2007. This list was updated in 2013, 2015 and 2018 (OIE, 2018).
- 311 The OIE list is based on a questionnaire sent to all OIE member countries
- **Criterion 1.** Importance of the antimicrobial based on answers by OIE member countries. This criterion was met when a majority of the respondents (more than 50%) identified the importance
- of the antimicrobial class in their response to the questionnaire.

- Criterion 2. Treatment of serious animal diseases and availability of alternative antimicrobial
   agents. This criterion was met when compounds within the class were identified as essential
   against specific infections and there was a lack of sufficient therapeutic alternatives.
- 318 If both these criteria are fulfilled the compound or class is regarded as a veterinary critically important 319 antimicrobial agent (VCIA).
- 320 If one of these criteria are fulfilled the compound or class is regarded as a veterinary highly important321 antimicrobial agent (VHIA).
- 322 If none of these criteria are fulfilled the compound or class is regarded as a veterinary important323 antimicrobial agent (VIA).
- 324 OIE list includes recommendations for antimicrobials that are considered as critically important for both
- human and animal health (fluoroquinolones, 3<sup>rd</sup>-and 4<sup>th</sup>-generation cephalosporins and colistin) (OIE,
- 326 2018). These recommendations include that these antimicrobials should not be used for prevention or
- 327 as a first line treatment and that their use should ideally be based on the results of bacteriological
- 328 tests.
- 329 Antimicrobial classes / sub classes used only in human medicine are not included in the OIE List.
- Recognising the need to preserve the effectiveness of the antimicrobial agents in human medicine, the
- 331 OIE advises that careful consideration should be given regarding their potential use (including extra-
- 332 label/off-label use) / authorisation in animals.

## 333 **3.3. Refinement of AMEG criteria**

The first AMEG report considered only antimicrobial classes that fulfilled the WHO's criterion 1 ('the antimicrobial class is the sole, or one of limited available therapies, to treat serious bacterial infections in people'), with the EU situation being taken into account. These classes are listed in Table A1 in Annex 1 to this report. The AMEG categorisation was based on three main criteria as follows: (i) the relative importance of the antimicrobial class for human medicine according to the WHO ranking, (ii) the likelihood of transfer of resistance, and (iii) if the class was authorised for use in a veterinary medicine in the EU. For the indicated antimicrobial classes, three categories were agreed by the AMEG:

- Category 1 antimicrobials used in veterinary medicine where the risk for public health is
   estimated as low or limited,
- Category 2 antimicrobials used in veterinary medicine where the risk for public health is
   estimated higher and
- Category 3 antimicrobials not approved for use in veterinary medicine.
- Criteria (i) and (ii) above are used to categorise classes or sub-classes as Category 1 or Category 2
  antimicrobials. For Category 1 classes or subclasses of antimicrobials, prudent use is recommended.
  For Category 2 classes or subclasses, restrictions on use are needed. Category 3 included classes that
  are currently not authorised in veterinary medicines.
- An objective of the current exercise is to review and update, as appropriate, the original AMEG
   categorisation (to consider additional criteria and/or refine the existing criteria). There are several
- 352 reasons for undertaking this review.
- 353 Firstly, with regard to the aminoglycosides (AGs), the CVMP's reflection paper recognises that in
- 354 accordance with the categorisation criteria in the first AMEG report, all veterinary authorised AGs
- 355 would be placed in Category 2. However, their use in veterinary medicine was considered to have a

- lower risk to human health compared with quinolones and 3<sup>rd</sup>- and 4<sup>th</sup>-generation cephalosporins.
- 357 Therefore, it was suggested that a further stratification of the AMEG's categorisation should be
- 358 considered. Likewise, for the aminopenicillins, the CVMP's (draft) risk profiling suggests that a further
- 359 stratification would be needed to enable a distinction in the ranking between the Category 2
- 360 substances and amoxicillin-clavulanate combinations, and between the latter and the straight
- aminopenicillins. The addition of an intermediate category is expected to improve the utility of the
- 362 categorisation as a risk management tool by avoiding the counterproductive outcome of too many
- antimicrobials being placed in a single 'higher risk' category with no possibility for prioritisation
- between them and where formal restrictions are necessary.
- In addition, further thought was given to the criterion on the likelihood of transfer of resistance. It was questioned if the scoring of the factors taken into consideration for this criterion could be integrated to provide a reliable qualitative assessment. It was also proposed that further consideration should be given to specific mechanisms of resistance/genes that might have particularly important consequences for human health. These elements are discussed in section 3.4.
- Also, with experience gained following application of the original AMEG categorisation, it was
- 371 considered that additional criteria should be taken into account. When considering the chain of events
- 372 leading from antimicrobial use in veterinary medicine to consequences on public health arising from
- 373 AMR, possible criteria, in addition to those used in the first AMEG report (the importance of the
- antimicrobial class in human medicine and the probability of AMR transfer), that could be considered to
- improve the categorisation of antimicrobials include:
- Criteria relating to antimicrobial class: Chemical properties; Pharmacological properties;
   Spectrum of activity (e.g. narrow versus broad; associated hazards); Mechanisms of resistance
   (e.g. location) / co / cross resistance.
- Criteria relating to conditions of use: Animal species; indications (e.g. treatment versus prophylaxis or metaphylaxis); dose and duration; route of administration (e.g. different category for different route of administration); impact on gastrointestinal tract (lumen concentration, shedding of resistant bacteria/resistance genes etc.; importance of the antimicrobials in veterinary medicine (e.g. OIE list); availability of antimicrobial alternatives in veterinary medicine.
- Criteria relating to prevalence of resistance: Pathogens, commensals, zoonoses, frequency of
   resistance, transfer of resistance or mutations.
- Criteria relating to environmental aspects: Degradability of antimicrobials in animals and
   animal waste, persistence of antimicrobial resistance genes and antimicrobial resistant bacteria in
   manure or slurry, evidence of environmental transfer.
- After considering the different potential criteria listed above, the following two were selected for moredetailed consideration:
- Route of administration: According to the mandate the AMEG agreed to further consider the route of administration as a criterion to refine the categorisation. As the largest reservoir of AMR following the administration of an antimicrobial results from the exposure of the gut flora, the route of administration is discussed extensively in Chapter 3.3.1 of this report.
- Indications for veterinary use and availability of alternative antimicrobials of lesser risk:
   The impact on animal health may be considered as part of the approach to categorisation.

- Consideration of the risk to public health has to be balanced with the importance of the substance
  for animal health. The importance of the substance for animal health is determined to a great
  extent by the availability of alternative treatment options for given indications in given species.
- 400 From the perspective of protecting human health, the greater the availability of alternative 401 treatment options for veterinary indications, the more restrictions on veterinary use for a given AM 402 can be tolerated without an adverse impact on animal health. Conversely, for those veterinary 403 indications where the availability of alternative treatment options is limited, restriction on 404 veterinary use for a given AM has the potential to impact negatively on animal health. This is 405 notwithstanding the fact that proportionate restrictions should be placed on the use of such classes 406 also for the management of the AMR risk to animal health. In addition it should be considered that 407 that restriction of one antimicrobial class could lead to an increase in use of other restricted classes 408 authorised for the same indications.
- The objective, therefore, is to consider the importance and availability of antimicrobial alternatives
  in veterinary medicine, and to identify if antimicrobials of lower risk to both public and animal
  health are available for the same indication.
- 412 Applying this criterion to the categorisation of individual AM (sub)classes relied on expert
- 413 judgement of AMEG members using information available in the form of the OIE list and the
- 414 reflection papers on various antimicrobial classes published by the CVMP/SAGAM/AWP.

## 415 **3.3.1. Impact of the route of administration on antimicrobial resistance**

- 416 There are different factors directly related to the administration of an antimicrobial that affect the
- 417 occurrence of AMR. These include: the type and formulation of the antimicrobial agent; the dose; the
- 418 total animal biomass exposed to the antimicrobial (i.e. individual treatment versus mass medication);
- the treatment interval and the treatment duration. The formulation determines the route of
- 420 administration but relatively little attention has been given to the association between the antimicrobial421 formulation and the rise of multidrug-resistant (MDR) organisms.
- 422 Across the EU as a whole, approximately 90% of all antimicrobials prescribed to livestock are given via 423 the oral route (EMA/EFSA, 2017; EMA/ESVAC, 2017; Filippitzi et al., 2014; Timmerman et al., 2006). 424 Administration of antimicrobial agents through either bulk animal feed or the drinking water supply, 425 rather than by injection, has major economic and ergonomic advantages. In addition, potential 426 unwanted effects of injection such as carcass damage or residues at an injection site are avoided. In 427 some situations (e.g. commercial chicken production, aquaculture) oral administration to the whole 428 group of animals is almost always the only feasible option. Furthermore, the withdrawal time (the 429 minimum period between the last administration of a veterinary medicinal product to an animal and 430 the production of foodstuffs from that animal which under normal conditions of use is necessary to 431 ensure that such foodstuffs do not contain residues in quantities harmful to public health) is in general
- 432 longer for VMPs administered by injection compared to VMPs administered orally.
- However, for orally administered antimicrobials there are several opportunities for incorrect intake of
  dose and for the antimicrobial to present an AMR selection pressure before the agent reaches the
- target tissue at a concentration able to inhibit or kill the microorganism involved in an infection.
- For in-feed medication, adequate mixing and homogenous distribution of the AM relies on the particle
  size and electrostatic properties of the premix, as well as the final composition of the feed and the
  mixing equipment used (Peeters, 2018). Further, the same equipment may also be used for the

- 439 production, storage and/or transport of both medicated and unmedicated feed, with the potential
- 440 carry-over of antimicrobial residues (Filippitzi et al., 2016). Oral administration *via* drinking water can
- be more precisely dosed compared to medication administered in food (Filippitzi, 2018). Although for
- 442 medication delivered via this route or in milk, the final concentration can still be highly variable and
- 443 may be further influenced by factors such as water hardness, pH, temperature, light (Luthman and
- Jacobsson, 1983) and complex formation (with e.g. Ca<sup>++</sup> in the milk replacer diet). It may, therefore,
  be difficult to control dosing so that it is consistent with the Summary of Product Characteristics (SPC)
- 446 of the VMP.
- 447 Other factors contributing to variable intake of oral group medications include a relatively poor control
  448 over intake due to hierarchy in the flock/group, a lower intake by diseased animals, uncertain duration
  449 of therapy and potential for cross contamination of feed.
- Of utmost importance with respect to the selection and containment of resistance is that oral
  antimicrobials may induce changes in the digestive tract microbiota, starting from the oropharynx and
  ending in the faeces, and by consequence in the environment. This is well documented for different
  antimicrobial agents in animals and humans (Crémieux et al., 2003; Sørum and Sunde, 2001).
- 454 The difference between oral and injectable formulations concerning the selection and spread of AMR in 455 the faecal flora alone is shown to be extremely high. e.g. in a randomised controlled study in rodents 456 the increase in the number of resistant coliforms in the group treated orally with ampicillin was 10,000 457 fold higher than in the group treated intravenously. The impact of oral versus intravenous 458 administration of tetracycline on the carriage of resistant enterococci was over a 100 fold and it was 459 suggested that this lower but significant difference may in part be due to biliary excretion of 460 tetracycline. (Zhang et al., 2013). Similar findings demonstrating substantial benefits of injectables 461 over oral administration in relation to development of antimicrobial resistance in the digestive tract 462 have been published in controlled studies in other animal species (Bibbal et al., 2007; Chantziaras et 463 al., 2017; Checkley et al., 2010; Wiuff et al., 2003). On a larger scale, microbiome studies have shown 464 oral antimicrobials to have detrimental and persistent effects on the gut (Zaura et al., 2015). For this 465 reason, and also due to high livestock densities that facilitate rapid exchange of multi-resistance within 466 and between production cycles (Heuer et al., 2002), the routine use of oral (group) medication has 467 been questioned (Catry, 2017).
- Further considerations relevant for the selection pressure in the digestive tract, such as accompanying
  diet, absorption, reabsorption, passage rate, biodegradation and the luminal volume have recently
  been reviewed (Volkova et al., 2017).
- 471 Selection of AMR may also be pronounced after injection (Wiuff et al., 2003) given that certain 472 antimicrobials administered parenterally can be actively excreted in the gut, *via* bile, where a similar 473 selection pressure for AMR can be expected. Further research is needed into the impact on the 474 selection of AMR in gastrointestinal microbiota by newer antimicrobial substances with long half-lives 475 that are administered as a single injection (e.g. certain macrolides) (Zaheer et al., 2013). Rectal or 476 sublingual administration to bypass the first pass effect (Steinman et al., 2000) and thereby also the 477 selection pressure in the vast majority of the digestive tract without certain disadvantages of
- 478 injectables, seems attractive from a research and development point of view.
- The "Joint Scientific Opinion on measures to reduce the need to use antimicrobial agents in animal husbandry in the European Union, and the resulting impacts on food safety" (RONAFA report) stated that oral administration of antimicrobials in livestock is of particular concern in terms of promoting the development of AMR due to the high exposure of gastrointestinal commensal bacteria, and the

- sometimes prolonged duration of treatment or exposure, especially for products administered in feed
  (EMA/EFSA, 2017). The purely preventative use of oral group treatments without clinical signs present
  (prophylaxis) should therefore be actively discouraged. Unjustified metaphylaxis is also of major
  concern. These issues are directly addressed in the new veterinary medicines regulation (Official
  Journal of the European Union, 2019).
- The general consensus guidance to optimise antimicrobial drug use in both human and veterinary medicine is to give an appropriate dose for a minimum period of time (Thomas et al., 1998; Zhao and Drlica, 2001). In order to limit exposure of the microbiome, the antimicrobial selection pressure should be as local and short as possible, in line with current PK/PD strategies (Lees et al., 2018). The duration of therapy must be as short as possible but without jeopardising clinical recovery. It has been suggested that this may be achieved in practice by continuing therapy up until two days after
- 494 symptoms have resolved (Chardin et al., 2009).
- A suggested listing of routes of administration and formulations, ranked in order from those with in
  general lower effect on the selection of AMR to those that would be expected to have higher impact on
  resistance, is proposed as follows:
- Local individual treatment (e.g. udder injector, eye or ear drops);
- Parenteral individual treatment (intravenously, intramuscularly, subcutaneously);
- Oral individual treatment (tablets, oral bolus);
- Injectable group medication (metaphylaxis), only if appropriately justified;
- Oral group medication via drinking water/milk replacer (metaphylaxis), only if appropriately
   justified.
- Oral medication *via* feed/premixes or top dressing (EMA/EFSA, 2017) (metaphylaxis), only if
   appropriately justified.
- This subchapter is based on a simple review of literature. The conclusions drawn and proposed order of
   ranking should be confirmed by a systematic review followed by a meta-analysis in which clinical
   efficacy and microbiological impacts should be studied as outcomes.
- 509 Given that antimicrobials in each (sub)class are available in a number of different formulations and for 510 administration by different routes, the AMEG chose not to include the route of administration as an 511 additional criterion for the categorisation. It was the view of the group that to consider the relative 512 AMR risk for all the different formulation/antimicrobial class combinations within the categorisation 513 would be highly complex and difficult to evidence. Nevertheless, when factoring AMR risk into 514 prescribing decisions, the aim should be to use the list above together with the AMEG categorisation to 515 select both the formulation/route of administration and class that will have the least impact on the 516 selection of AMR.

## 517 **3.4.** Transmission of antimicrobial-resistant bacteria or resistance 518 determinants between animals and man

The likelihood of spread of AMR between animals and humans depends on a number of factors that
influence either the spread of organisms exhibiting such resistance or the spread of resistance genes.
Four different criteria defining the risk for spread are discussed below. The resistance to a particular
substance/class has highest risk for spread if all four criteria are fulfilled.

- 523 The likelihood of spread varies over time and depends on the "bug-drug" combination. The level of
- 524 detection also depends on the sampling frame, origin of samples and the methods used for sampling,
- 525 for culture and for susceptibility testing. Whether the criteria are fulfilled for a certain substance or
- 526 class may therefore need to be modified over time if new data become available from studies
- 527 conducted under different conditions, or in the event that the relevant resistance mechanisms of the 528 bacteria under investigation are proven to have evolved and reorganised.
- 529 Exposure to antimicrobials amplifies resistance (Levy, 2002; MacKenzie et al., 2007). In general, when
- 530 there is a decrease in the exposure of animals to antimicrobials a decrease in resistance is observed
- 531 (Hanon et al., 2015). The same considerations are applicable to antimicrobial usage in human
- 532 medicine. Nevertheless resistance can persist in the absence of antimicrobial use (Enne et al., 2001).
- 533 If this is the case (or in cases of co-resistance), reduction of consumption of a certain substance, in
- both veterinary and human medicine, will not necessarily lead to consequent reduction in AMR.
- 535 It should also be realised that although the transmission of AMR from animals to humans is
- 536 undoubtedly highly important and is of particular relevance to this document, spread of AMR from
- 537 humans to animals can also occur as a consequence of antimicrobial usage in human medicine
- 538 (ECDC/EFSA/EMA, 2017). Examples of such transfer have been documented in relation to the
- appearance of decreased susceptibility to carbapenems in *Salmonella* spp., and *E. coli* in pigs and
- 540 poultry in Germany (Fernández et al., 2018; Fischer et al., 2017). Similarly epidemiological evidence
- as well as whole genome sequencing of LA-MRSA from pigs and associated human cases in
- 542 Norway clearly indicates that primary introduction to sow farms occurred through human-to-animal
- 543 transmission (Grøntvedt et al., 2016). Studies have also documented transfer of MRSA from farmers to
- dairy cows in Sweden (Unnerstad et al., 2018).
- Several highly successful clones of MDR bacteria that have spread EU-wide and in some cases
  worldwide in recent years include *E. coli* ST131 (Mathers et al., 2015), monophasic *Salmonella*Typhimurium (García et al., 2017; Hopkins et al., 2010a) and LA-MRSA (Kinross et al., 2017). Of these *E. coli* ST131 is an almost strictly human pathogen and its spread has been for the most part in the
  human population (Mathers et al., 2015), whereas monophasic *S. Typhimurium* and LA-MRSA are
  zoonotic pathogens and their spread may have been facilitated by the use of antimicrobials in food
  animals (EFSA, 2010; Grøntvedt et al., 2016).
- 552 Aspects of evolution and organisation of the resistance mechanisms are presented below according to 553 four criteria to describe the likelihood of spread:
- 554 1) The presence of a chromosomal mutation contributing to the development of resistance to a 555 clinically-relevant antimicrobial. Such mutations may occur randomly, and may give rise to 556 both high level or low level resistance e.g. mutational resistance to fluoroquinolones in 557 Campylobacter spp. (high level) or Salmonella spp. (low level). Alternatively, a series of 558 stepwise mutations may be required before resistance reaches a level regarded as of 559 therapeutic importance. Stability of the mutation(s) in the chromosome is also required for a 560 critical level of spread of organisms exhibiting such resistance, whereby mutational resistance 561 passes from the parent to the daughter bacterial colonies (clonal spread). A single mutational 562 event giving rise to resistance to a particular antimicrobial might result in resistance to several 563 substances within related classes of antimicrobial agents.
- 564 2) Organisation of non-chromosomal resistance genes into horizontally-transferable elements
  565 (Carattoli, 2009), enabling localisation on DNA outside the bacterial chromosome (e.g.
  566 conjugative or mobilisable plasmids, transposons, integron-gene cassettes). The likelihood of
  567 further spread is variable, dependent on the plasmid, the presence or absence of genes

mediating plasmid transfer, the presence of unrelated transferable plasmids which can mediate
the transfer of plasmids without the necessary transfer-related genes by mobilisation, and
whether horizontal plasmid/gene transfer is limited to one type of organism or if it crosses
borders between related or distinct bacterial species.

- 572 3) Other factors such as: (a) the incorporation of plasmid- or transposon/integron-mediated 573 resistance into the bacterial chromosome in discrete 'resistance islands', which may require mobilisation by other plasmids or by bacteriophages for horizontal transfer either within or 574 575 between bacterial species; (b) presence of plasmid addiction systems. Such systems involve 576 plasmid-mediated genes encoding toxin-antitoxin proteins where they serve to stabilise the 577 plasmid within a bacterial population and, in the case of plasmids which code for resistance to 578 a range of antimicrobials, lessen their chances of loss when antibiotic selection pressure is 579 withdrawn. Such systems are becoming increasingly identified in plasmids belonging to a wide 580 range of incompatibility groups, and have an important role in the maintenance of such 581 plasmids in host bacteria.
- 582 4) The presence of a cluster of resistance genes will enable more efficient spread by co-selection.
   583 This process allows resistance spread for substance A when the unrelated substance B is used,
   584 because of linkage of resistance genes and subsequent co-transfer.
- 585 In the first AMEG report, for each antimicrobial class, influencing factors including those above were 586 assigned a numerical score and crudely integrated to give a qualitative estimate of the overall 587 probability of resistance transfer. For this updated report, the AMEG agreed that these values (see 588 3.4.2 for explanation), although individually informative for each factor, are not 'mathematically 589 scaled' and that there is no validation that they can be combined to predict the probability of 590 resistance transfer. The qualitative assessment (high, medium, low) based on this information has 591 therefore been removed from the tables in this updated advice. While the AMEG agreed that a 592 qualitative estimate of the overall probability of resistance transfer should not be incorporated into the 593 approach to categorisation of individual AM (sub)classes, the AMEG was of the view that account 594 should be taken of specific resistance genes associated with certain classes where transmission of 595 these specific resistance genes could have important consequences for human health (that is, where 596 these are mobile and confer multi-resistance to antimicrobials that are 'last resort' or used solely in 597 human medicine). Resistance mechanisms are documented in Table 2 and where particularly relevant 598 for the final categorisation they are discussed in the 'rationale' column for each class in Table 4.
- 599It was agreed that the criterion should be amended as follows: The Knowledge of factors influencing600the likelihood and possible consequences of AMR transfer from animals to humans. In the new
- 601 categorisation individual mechanisms of resistance have been considered more specifically for e.g.
   602 those genes associated with mobile multiresistance.
- In addition to the factors listed above, that for the most part relate only to genetic mechanisms, thereare many other factors that may affect the probability of transfer of resistant bacteria or its
- determinants from animals to humans which reflect the conditions of use of the antimicrobial
- substance, e.g. dosing route and regimen, volume of usage, animal husbandry conditions. These must
- be taken into consideration for a full public health risk assessment (Codex Alimentarius, 2009; CodexAlimentarius, 2011).
- 609 For bacteria that may be foodborne there are a number of additional factors to consider such as
- 610 consumption habits, environmental factors and the processes between slaughter and intake of food
- 611 (Codex Alimentarius, 2009; Codex Alimentarius, 2011).

- Tables 2 and 3 below list the classes/substances under assessment, adding information on the
- 613 bacterial hazards of zoonotic potential and the various resistance mechanisms.

## 615 **3.4.1.** Consideration of AM classes not taken into account in AMEG 1 advice<sup>‡</sup> and those given further consideration<sup>§</sup>

616 Several antimicrobial classes were not considered in the first advice from AMEG or have been given further consideration for this updated advice to provide a 617 complete categorisation of antimicrobials. For the additional antimicrobial classes, the hazard of potential zoonotic relevance as well as an overview of 618 indications in human medicine and resistance mechanisms are provided in Table 2.

619 **Table 2.** Overview of indications in human medicine and relevant mechanisms of resistance for antimicrobials not covered by AMEG 1 advice (for details and

620 references see Table 3)

Antimicrobial class**	Hazard of potential zoonotic relevance	Overview of indications in human medicine and resistance mechanisms		
Amidinopenicillins	Enterobacteriaceae	<ul> <li>Narrow spectrum of activity.</li> <li>One of the first choices for uncomplicated urinary tract infections (UTI).</li> <li>Important antimicrobials and should be preserved, since effectiveness of other oral antibiotics is declining.</li> <li>Only mutational resistance described.</li> <li>No description of successful clones of relevance to animals.</li> </ul>		
Aminoglycosides	Enterobacteriaceae <i>Enterococcus</i> spp.	<ul> <li>Important antimicrobials used alone, or in conjunction with other antimicrobials for the treatment of serious Gram-negative infections.</li> <li>Can also be used in combination for Gram-positive infections (<i>S. aureus</i>, streptococci and enterococci), such as endocarditis.</li> <li>Also used as part of first-line therapeutic regimens for infections with multidrug-resistant <i>Mycobacterium tuberculosis</i> and as part of treatment combinations for non-tuberculous mycobacteria.</li> <li>Three main mechanisms of resistance are: <ul> <li>reduction of the intracellular concentration of the antimicrobial;</li> <li>enzymatic modification of the drug;</li> </ul> </li> </ul>		

<sup>&</sup>lt;sup>\*</sup> For substances considered in the first AMEG report, Table 2 of that report (reproduced here in Annex 1, Table A1) includes information on indications in human medicine and the hazards of potential zoonotic relevance.

<sup>&</sup>lt;sup>§</sup> Aminoglycosides and Aminopenicillins have been included in the table as further consideration of their categorization was requested by the EC in its 2017 mandate. The information on Polymyxins has been updated in view of the AMEG's revised advice, 2016. Expanded information has been provided on Macrolides.

<sup>\*\*</sup> Examples of ATC and ATCvet codes for the antimicrobial groups, subgroups and substances are provided in Annex A2, Table A2.

Antimicrobial class**	Hazard of potential zoonotic relevance	Overview of indications in human medicine and resistance mechanisms			
		<ul> <li>modification of the molecular target.</li> <li>Resistance genes often located on mobile elements thereby facilitating spread between different bacterial species and between animals and humans.</li> <li>Same resistance genes found in isolates from humans and animals.</li> </ul>			
Aminopenicillins	<i>Enterococcus</i> spp. Enterobacteriaceae	<ul> <li>Aminopenicillins and their inhibitor combinations are one of the limited therapeutic options for infections caused by <i>Listeria monocytogenes</i> and <i>Enterococcus</i> spp.</li> <li>Among the most commonly used antimicrobials in the EU for the treatment of various infections, e.g. respiratory tract, abdominal, soft tissue and urinary tract infections.</li> <li>Main mechanisms of bacterial resistance to aminopenicillins are: <ul> <li>alterations in penicillin-binding proteins (PBP) mediated by the <i>mec</i> genes ;</li> <li>hydrolysis by β-lactamases.</li> <li>presence of efflux pumps/ alterations in expression of outer membrane proteins.</li> </ul> </li> <li>Use can create selection pressure leading to emergence of resistance and possible transmission of drug-resistant bacteria or resistance genes from non-human sources to humans.</li> </ul>			
Amphenicols	Enterobacteriaceae Staphylococci <i>Salmonella</i> spp. <i>Campylobacter</i> spp.	<ul> <li>Chloramphenicol second line antimicrobial.</li> <li>Broad spectrum including both Gram-positive and Gram-negative bacteria.</li> <li>Antimicrobial which is mainly used in low and middle income countries for treatment of typhoid.</li> <li>Chromosomal mutations as well as horizontal gene transfer.</li> <li>Predominant mechanism of resistance enzymatic inactivation (cat).</li> <li>Resistance can also be due to exporter genes (<i>cmlA</i>, <i>fexA</i>, <i>fexB</i>, and <i>floR</i>), as well as the MDR ene <i>cfr</i> that confers resistance to phenicols as well as lincosamides, oxazolidinones, pleuromutilins, and streptogramin A.</li> <li>ABC transporter gene, <i>optrA</i>, confers resistance to phenicols and oxazolidinones, in <i>Enterococcus</i> and <i>Staphylococcus</i> spp.</li> <li>Both <i>cfr</i> and <i>optrA</i> confer transferable resistance to linezolid.</li> <li><i>optrA</i> also confers resistance to tedizolid.</li> </ul>			
Cephalosporins, $1^{st}$ - and $2^{nd}$ -	Enterobacteriaceae	• 1 <sup>st</sup> -generation cephalosporins have good activity against Gram-positive bacteria, e.g.			

Antimicrobial class**	Hazard of potential zoonotic relevance	Overview of indications in human medicine and resistance mechanisms			
generation, and cephamycins	MSSA (Methicillin-susceptible Staphylococcus aureus)	<ul> <li>for treatment of MSSA and streptococci.</li> <li>Modest activity against Gram-negative bacteria.</li> <li>Use in humans include skin and soft tissue infections, streptococcal pharyngitis, bacteraemia, endocarditis and others.</li> <li>2<sup>nd</sup> - generation cephalosporins have less activity against Gram-positive bacteria and more towards Gram-negative bacteria.</li> <li>Cephamycins have also anaerobic activity.</li> <li>1<sup>st</sup>- and 2<sup>nd</sup>-generation cephalosporins recommended and most used antibiotics for surgical prophylaxis.</li> <li>Resistance mainly due to β-lactamases (ESBLs and AmpC) and decreased ability to bind to penicillin-binding proteins (PBPs) (e.g <i>mec</i>A).</li> <li>ESBL genes often located on plasmids.</li> <li><i>ampC</i> genes commonly located on the chromosome but may also be found on plasmids.</li> <li>Some of these <i>ampC</i> genes are expressed inducibly; others constitutively.</li> <li>Cephamycins (cefoxitin and cefotetan) not hydrolyzed by majority of ESBLs but by AmpC-type β-lactamases.</li> </ul>			
Cyclic polypeptides (bacitracin)	N/A	<ul> <li>Bacitracin mostly used topically for superficial skin infections caused by Gram-positive bacteria.</li> <li>Four bacitracin resistance mechanisms: a) <i>bacA</i> gene, renamed to uppP, in <i>S. aureus, S. pneumoniae, E. faecalis</i>, b) <i>bcrABC</i> genes, c) overproduction of undecaprenol kinase, d) mutations inhibiting synthesis of exopolysaccarides.</li> <li><i>bcrABD</i> operon located on plasmids in <i>C. perfringens</i> and <i>E. faecalis</i> as part of a MDR encoding conjugative plasmid associated with high-level resistance to bacitracin in <i>E. faecalis</i> in chickens.</li> <li><i>E. faecalis</i> isolates in humans and chickens shown to have homology and thus point to zoonotic potential.</li> </ul>			
Macrolides	<i>Campylobacter</i> spp., <i>Staphylococcus aureus</i>	<ul> <li>In humans, macrolides are used to treat atypical community-acquired pneumonia, <i>H. pylori</i> infection (as part of triple combination therapy), <i>Chlamydia</i> infections, acute non-specific urethritis, shigellosis, salmonellosis, campylobacteriosis, and pertussis. Macrolides are also a useful alternative for treatment in patients allergic to penicillins and cephalosporins.</li> <li>Mechanisms of resistance include modification of the target, drug inactivation and drug</li> </ul>			

Antimicrobial class**	Hazard of potential zoonotic relevance	Overview of indications in human medicine and resistance mechanisms			
		<ul> <li>efflux. Resistance conferred by chromosomal mutations as well as horizontal transfer of resistance genes (<i>erm</i>, <i>vga</i>, <i>lnu</i>, <i>lmr</i>, <i>cfr</i>).</li> <li>The most common resistance mechanism is a target site modification mediated by at least 32 different rRNA methylases (<i>erm</i> genes) described in 34 bacterial genera, which reduces the binding of the macrolides, lincosamides and streptogramin B to the ribosomal target site.</li> <li>Many of the <i>erm</i> genes have been identified in Gram-positive, Gram-negatives and anaerobic bacteria and can be horizontally transferred (associated with conjugative or non-conjugative transposons, which tend to reside on the chromosomes). Macrolide-resistant <i>Campylobacter</i> spp. can be transmitted from animals to humans via food of animal origin.</li> </ul>			
Lincosamides	MRSA (Methicillin-resistant <i>Staphylococcus aureus</i> )	<ul> <li>In humans, lincosamides (clindamycin) used to treat infections caused by anaerobic and Gram-positive bacteria, e.g. staphylococci (including MSSA, MRSA and coagulase-negative staphylococci) and streptococci.</li> <li>Mechanisms of resistance include modification of the target, drug inactivation and drug efflux.</li> <li>Resistance conferred by chromosomal mutations as well as horizontal transfer of resistance genes (<i>erm, vga, lnu, lmr, cfr</i>).</li> <li>Most common resistance mechanism is target site modification mediated by <i>erm</i> genes described in numerous bacterial genera, which are frequently associated with mobile genetic elements, e.g. transposons and can be horizontally transferred.</li> <li>Homology between animal and human isolates demonstrated.</li> <li>MDR <i>cfr</i> confers resistance not only to lincosamides but also to phenicols, streptogramin A, pleuromutilins and oxazolidinones.</li> </ul>			
Nitrofuran derivatives (e.g. nitrofurantoin)	N/A	<ul> <li>Nitrofurantoin is one of the first choices of antimicrobials for treating uncomplicated UTI in women, including treatment of UTIs with ESBL-producing Enterobacteriaceae.</li> <li>Resistance either via chromosomal mutations and also plasmid-mediated via efflux genes, e.g <i>oqxA/B</i>, which confer MDR, including to nitrofurantoin.</li> </ul>			
Nitroimidazoles	C. difficile	<ul> <li>Nitroimidazoles, mainly metronidazole and tinidazole, mostly used to treat infections caused by anaerobic bacteria.</li> <li>Metronidazole considered first line therapy in the paediatric population for <i>Clostridioides</i></li> </ul>			

Antimicrobial class**	Hazard of potential zoonotic relevance	Overview of indications in human medicine and resistance mechanisms			
		<ul> <li>(Clostridium) difficile (C. difficile).</li> <li>In the adult population can be used for treatment of mild to moderate infections with C. difficile when first line therapy not available.</li> <li>Nitroimidazoles also used for the treatment of certain intestinal parasites (e.g. Giardia lamblia, Entamoeba histolytica).</li> <li>Metronidazole classified as an essential medicine by WHO and important to preserve, since widely used in humans, including surgical prophylaxis in penicillin-allergic patients.</li> <li>Resistance reported worldwide but mechanisms have not been extensively studied.</li> <li><i>nim</i> genes encoding resistance in <i>Bacteroides</i> spp. found on plasmids which are highly transferable between <i>Bacteroides</i> spp. in the ecosystem, animals and humans.</li> <li>C. difficile has mobile genetic elements that can horizontally transfer resistance; homology in genetic sequences between animals and humans.</li> <li>Successful C. difficile clones, such as ribotype 078n found in animals and humans.</li> </ul>			
Penicillins: Anti-staphylococcal penicillins (β-lactamase- resistant penicillins )	MSSA (Methicillin-susceptible Staphylococcus aureus)	<ul> <li>Important antimicrobials for treatment of methicillin-susceptible staphylococci and syphilis.</li> <li>Resistance due to importation of <i>mec</i> genes leading to changes in penicillin binding protein 2 (PBP2) and to lesser degree due to mutations in the other penicillin binding proteins.</li> <li>Horizontal transfer of resistance. Predominant mechanism in staphylococci including LA-MRSA mediated by <i>mecA</i> gene. Changes in PBP2 can also be mediated by <i>mecC</i> as well as <i>mecB</i>.</li> <li><i>mec</i> gene situated in the SCC med cassette that can be transferred between <i>S. aureus</i> and coagulase-negative staphylococci.</li> <li>Assessment for probability of resistance transfer and likelihood of zoonotic transfer based on <i>mecA</i>- positive staphylococci</li> <li>Risk for zoonotic transfer predominantly an occupational hazard.</li> </ul>			
Pleuromutilins	MRSA (Methicillin-resistant Staphylococcus aureus)	<ul> <li>Pleuromutilins only used topically for treatment of bacterial skin infections, e.g. <i>S. aureus</i>.</li> <li>Resistance derives from chromosomal mutations.</li> <li>In addition, resistance genes (e.g. <i>vga</i>, <i>cfr</i>) are located on mobile genetic elements.</li> <li>The <i>cfr</i> gene mediates resistance not only to pleuromutilins, phenicols, lincosamides and streptogramin A, but also to oxazolidinones.</li> </ul>			

Antimicrobial class**	Hazard of potential zoonotic relevance	Overview of indications in human medicine and resistance mechanisms			
		Found in many bacterial species, including MRSA.			
Polymyxins (e.g. colistin)	Enterobacteriaceae	<ul> <li>Polymyxins, most notably colistin, are antibiotics that have re-emerged for treatment of multidrug-resistant Gram- negative infections, e.g. MDR <i>Pseudomonas aeruginosa, Acinetobacter baumannii</i> and Enterobacteriaceae, usually when alternative effective therapeutic options are limited or non-existent.</li> <li>Chromosomal colistin resistance increasing in most EU/EEA countries.</li> <li>Resistance also due to plasmid-mediated <i>mcr</i> gene reported globally from animals, food products, the environment and as well in human clinical and non-clinical (screening) specimens.</li> <li>Presence of horizontally transferable colistin resistance in food animals, food products, the environment, paired with high rates of <i>in vitro</i> transfer between bacteria, worrisome for human medicine, as presence confers full resistance to colistin, rendering bacteria pandrug-resistant and likely resulting in poor patient outcomes.</li> <li>Further studies needed to evaluate direct transfer of <i>mcr</i> genes from food animals and food to humans.</li> </ul>			
Pseudomonic acid	MRSA (Methicillin-resistant Staphylococcus aureus)	<ul> <li>Mupirocin first line antimicrobial available for decolonisation of <i>Staphylococcus aureus</i> (MSSA and MRSA) in humans and therefore, needs to be preserved.</li> <li><i>Stapylococcus aureus</i> decolonisation shown to significantly reduce morbidity and mortality in patient who undergo certain types of surgery.</li> <li>Clonal transfer, including Livestock Associated (LA)-MRSA and horizontal gene transfer (mupA, mupB) shown.</li> </ul>			
Steroid antibacterials (fusidic acid)	MRSA (Methicillin-resistant Staphylococcus aureus)	<ul> <li>Fusidic acid mainly used for combination therapy in humans (systemic treatment) of staphylococcal infections or topically for treatment of skin or eye infections.</li> <li>Mutational resistance (<i>fusA</i>), genes on mobile elements (<i>fusB</i>, <i>fusC</i>), as well as spread of resistance through successful clones of staphylococci described.</li> </ul>			
Streptogramins	Enterococcus spp. (glycopeptide-resistant <i>E. faecium</i> ) and MRSA (Methicillin-resistant	• Streptogramin family of antimicrobials consists of mixture of two groups of substances acting synergistically: streptogramin A and streptogramin B. Quinupristin-dalfopristin and pristinamycin could theoretically be alternatives in human medicine to treat glycopeptide-resistant enterococci and MRSA infections, but are presently considered			

Antimicrobial class**	Hazard of potential zoonotic relevance	Overview of indications in human medicine and resistance mechanisms			
	Staphylococcus aureus)	<ul> <li>obsolete.</li> <li>Resistance genes (e.g. <i>erm</i>, <i>cfr</i>, <i>vga</i>, <i>lsa</i>, <i>sal</i>(<i>A</i>)) described and some of these in multiple bacterial species including staphylococci and enterococci.</li> <li>Clonal transfer (LA-MRSA) as well as horizontal transfer of genes described. MDR genes: cfr, <i>lsaA</i> and <i>lsaE</i> of particular concern.</li> <li><i>cfr</i> gene mediates resistance not only to streptogramin A, phenicols, lincosamides and pleuromutilins, but also to oxazolidinones,</li> <li>Found in many bacterial species, including MRSA.</li> </ul>			
Sulfonamides, dihydrofolate reductase inhibitors and combinations	Enterobacteriaceae, Staphylococcus aureus	<ul> <li>These combinations used for the treatment of UTIs, bronchitis, otitis media, pneumonia, staphylococcal (MSSA and MRSA) skin infections and the prevention and treatment of <i>Pneumocystis (Carinii) Jiroveci</i> pneumonia and traveller's diarrhoea.</li> <li>Resistance to both has spread extensively and rapidly. Mainly due to the horizontal spread of resistance genes, expressing drug-insensitive variants of the target enzymes dihydropteroate synthase and dihydrofolate reductase, for sulfonamide and trimethoprim, respectively.</li> <li>Chromosomal resistance as well as transfer by mobile genetic elements (<i>sul1, sul2, sul3, dfr</i>).</li> <li><i>sul1</i> gene is part of class 1 integrons and thus often associated with other resistance genes.</li> </ul>			

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## 622 **3.4.2.** Mechanisms for transfer of resistance genes and resistant bacteria

Based on the literature review summarised in table 2, and with reference to Table 3 of the first AMEG report, the information available on various ways of

transfer of resistance were defined and scored (Table 3) based on the criteria below:

**Transmission of resistance through successful clone(s).** Defined as the vertical transfer of a resistance gene through the parent to the daughter bacterium in a successful, highly disseminated drug-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 a particular successful drug-resistant clone;
- 2. gene is exclusively on the core bacterial chromosome in a particular successful drug-resistant clone (e.g. ST131);
- 3. gene is not only on a mobile genetic element, e.g. plasmid, but is also part of a highly-transmissible, successful drug-resistant clone (e.g. ST131)

631 **Horizontal transmission** Defined as a transfer of resistance gene by means of mobile genetic elements. Probability (1 to 3):

- 1. no mobile genetic element described;
- 2. gene is exclusively on the core bacterial chromosome but can be mobilised;
- 3. gene is on a mobile genetic element, e.g. plasmid, transposon.

636 Co-selection of resistance. Defined as a type of resistance where use of one antimicrobial favours the occurrence of resistance to other antimicrobial classes or sub-classes 637 with a different spectrum. In this table, co-selection is limited to situations when different resistance genes are co-located on one mobile genetic element or are located in a 638 genetic environment together with other resistance genes in such a way that there is a potential for mobilisation (e.g. IS-elements or resistance islands). A special case when 639 one gene mediates resistance to several unrelated antimicrobial classes is also included. Probability (1 to 3): 640

- 1. no linkage of the gene with other resistance genes has been described, nor is it located in a genetic environment favouring mobilisation of the former gene and other resistance genes:
- 2. either linkage of the gene with other resistance genes on a mobile genetic element or location of the gene in a genetic environment favouring mobilisation of the gene together with other resistance genes have been described;
- 3. both linkage of the gene with other resistance genes on a mobile genetic element and location of the gene in a genetic environment favouring mobilisation of the gene together with other resistance gene has been described.

647 Transmission of resistance through zoonotic or commensal food-borne bacteria. Defined as transmission of resistance through zoonotic pathogens (e.g. Salmonella 648 spp., Campylobacter spp., MRSA, E, coli (VTEC/STEC) or transmission of resistance through commensal food-borne bacteria (e.g. E, coli, Enterococcus spp.), Probability (1 to 649 3): 650

- 1. no transmission of resistance through zoonotic pathogens or commensal food-borne bacteria;
- 2. **either** transmission of resistance through zoonotic pathogens **or** through commensal food-borne bacteria;
- 3. **both** transmission of resistance through zoonotic pathogens **and** through commensal food-borne bacteria.

654 Similarity of resistance: Genes: defined as a similar resistance gene detected in bacterial isolates of animal and human origin; Mobile genetic elements: defined as a similar 655 resistance-conferring mobile genetic element detected in bacterial isolates of animal and human origin; Drug-resistant bacteria: defined as a similar bacterium harbouring a 656 resistance gene (either chromosomally or mobile genetic element-encoded) of animal and human origin. Probability (1 to 3):

- 657 1. unknown resistance similarity;
- 658 2. resistance genes have been shown to be similar between animals and humans;
- 659 3. **both** resistance genes **and** mobile genetic elements have been shown to be similar between animals and humans;
- 660 4. resistance genes, mobile genetic elements and drug-resistant bacteria have **all** been shown to be similar between animals and humans.
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- 663 **Table 3.** Classification of antimicrobial classes according to their likelihood for transfer of resistance genes and resistant bacteria via different mechanisms.
- 664 For definitions of criteria for the different columns please see above.

Antimicrobial classes, subclasses, substances <sup>††</sup>	Transmission of resistance through successful clone(s)	Horizontal transmission of resistance	Co-selection of resistance	Transmission of resistance through zoonotic or commensal food-borne bacteria	Similarity of resistance	References
Amidinopenicillins	1	1	1	1	1	EMA/CVMP/AWP (2018a) Frimodt-Moller (2017) Kahlmeter and Poulsen (2012) Poulsen et al. (2013) Thulin et al. (2015) Thulin et al. (2017)
Aminoglycosides	3	3	3	3	3	Chen et al. (2007) Davis et al. (2010) Deng et al. (2011) Du et al. (2009) EMA/CVMP/AWP (2018b) Gonzalez-Zorn et al. (2005) Hopkins et al. (2010b) Liu et al. (2008)
Aminopenicilins including β- lactamase inhibitors combinations	3	3	3	3	3	EMA/CVMP/AWP (2018a)
Amphenicols	3	3	3	3	4	Long et al. (2006) Schwarz et al. (2004) Shen et al. (2013) Wang et al. (2015) Zhao et al. (2016)
Carbapenems and other penems	3	3	3	2	2	Dortet et al. (2014) EFSA BIOHAZ Panel

<sup>++</sup> Examples of ATC and ATCvet codes for the antimicrobial groups, subgroups and substances are provided in Annex A2, Table A2.

Answer to the request from the European Commission for updating the scientific advice on the impact on public health and animal health of the use of antibiotics in animals - Categorisation of antimicrobials EMA/CVMP/CHMP/682198/2017

Antimicrobial classes, subclasses, substances <sup>++</sup>	Transmission of resistance through successful clone(s)	Horizontal transmission of resistance	Co-selection of resistance	Transmission of resistance through zoonotic or commensal food-borne bacteria	Similarity of resistance	References
						(2013) Le Hello et al. (2013)
Cephalosporins: $1^{st}$ - and $2^{nd}$ -generation and cephamycins	3	3	3	3	3	Gazouli et al. (1996) Knothe et al. (1983) Mulvey et al. (2005)
Cephalosporins: 3 <sup>rd</sup> -and 4 <sup>th</sup> - generation	3	3	3	3	4	Catry et al. (2010) EFSA BIOHAZ Panel (2011) EMA/CVMP (2012) EMEA/CVMP/SAGAM (2009) Kluytmans et al. (2012) Liebana et al. (2013)
Cephalosporins: Other cephalosporins and penems (ATC code J01DI)	1	1	1	1	1	Casapao et al. (2012) Curcio (2014) Pillar et al. (2008) Steed and Rybak (2010)
Cyclic polypeptides (bacitracin)	3	3	3	3	4	Chancey et al. (2012) Charlebois et al. (2012) Chen et al. (2016) Han et al. (2015) Manson et al. (2004) Olsen et al. (2012) Poulsen et al. (2012) Wang et al. (2014)
Glycopeptides	2	2	2	2	2	Braga et al. (2013) Rice (2012) Silveira et al. (2013)
Glycylcyclines	2	1	2	1	1	EMA/AMEG (2013)

Antimicrobial classes, subclasses, substances <sup>††</sup>	Transmission of resistance through successful clone(s)	Horizontal transmission of resistance	Co-selection of resistance	Transmission of resistance through zoonotic or commensal food-borne bacteria	Similarity of resistance	References
Lincosamides	3	3	3	3	3	EMA/CVMP/SAGAM (2011)
Lipopeptides	1	1	1	1	1	Bayer et al. (2013) Kelesidis and Chow (2014) Kelesidis (2015)
Macrolides (including ketolides)	3	3	3	3	2	EMA/CVMP/SAGAM (2011) Pyorala et al. (2014) Roberts (2008) Roberts (2011)
Monobactams	3	3	3	3	2	Catry et al. (2010) EFSA BIOHAZ Panel (2011) EMA/CVMP (2012) EMEA/CVMP/SAGAM (2009) Kluytmans et al. (2012) Liebana et al. (2013)
Nitrofurantoins	3	3	3	3	3	Chen et al. (2012) García et al. (2017) Giske (2015) Ho et al. (2016) Li et al. (2013) Liu et al. (2013) Liu et al. (2013) Osei Sekyere (2018) Perez et al. (2013) Sandegren et al. (2008)
Nitroimidazoles	3	3	3	3	4	Álvarez-Pérez et al. (2014)

Antimicrobial classes, subclasses, substances <sup>††</sup>	Transmission of resistance through successful clone(s)	Horizontal transmission of resistance	Co-selection of resistance	Transmission of resistance through zoonotic or commensal food-borne bacteria	Similarity of resistance	References
						Álvarez-Pérez et al. (2017) Andrés-Lasheras et al. (2018) Baines et al. (2008) Brazier et al. (1999) Dingsdag and Hunter (2017) Freeman et al. (2015) Knetsch et al. (2014) Kuijper and Wilcox (2008) Löfmark et al. (2014) Miyamoto et al. (2013) Nguyen and Vedantam (2011) Nikolich et al. (1994) Shoemaker et al. (2011) Snydman et al. (2012) Peng et al. (2017) Pirš et al. (2013) Snydman et al. (2015)
Oxazolidinones	3	3	2	1	2	Bonilla et al. (2010) Diaz et al. (2012) Endimiani et al. (2011) Gu et al. (2012) Liu et al. (2012) Mendes et al. (2014) Sanchez Garcia et al. (2010)

Antimicrobial classes, subclasses, substances <sup>††</sup>	Transmission of resistance through successful clone(s)	Horizontal transmission of resistance	Co-selection of resistance	Transmission of resistance through zoonotic or commensal food-borne bacteria	Similarity of resistance	References
Penicillins: Anti-staphylococcal penicillins (β-lactamase-resistant penicillins) <sup>‡‡</sup>	3	2	2	2 <sup>§§</sup>	4	Becker et al. (2018) Peeters et al. (2015) Price et al. (2012) Ward et al. (2014)
Penicillins: Natural, narrow- spectrum penicillins (β-lactamase- sensitive penicillins), carboxypenicillins and ureidopenicillins	3	1	2	2	2	Bush and Jacoby (2010) Jacoby (2012) U.S. National Library of Medicine (last accessed: 2018)
Phosphonic acid derivates (e.g. fosfomycin)	3	3	2	1	1	Karageorgopoulos et al. (2012) Oteo et al. (2009) Pérez et al. (2014) Wachino et al. (2010)
Pleuromutilins	2	3	2	3	4	Hauschild et al. (2012) Kadlec and Schwarz (2009) Kadlec et al. (2010) Kehrenberg and Schwarz (2006) Kehrenberg et al. (2009) Mendes et al. (2011) Shen et al. (2013) Wendlandt et al. (2013b)
Polymyxins (e.g. colistin)	3	1	2	3	3	EMA/AMEG (2016) Halaby et al. (2013) Monaco et al. (2014)
Pseudomonic acid	3	3	3	3	4	Desroches et al. (2013)

<sup>++</sup> The assessment is based on the most frequent gene coding for resistance against antistaphylococcal penicillins (*mecA*) <sup>§§</sup> Foodborne transmission has been implicated but is at the present time considered to be very rare (EFSA risk assessment)

Antimicrobial classes, subclasses, substances <sup>††</sup>	Transmission of resistance through successful clone(s)	Horizontal transmission of resistance	Co-selection of resistance	Transmission of resistance through zoonotic or commensal food-borne bacteria	Similarity of resistance	References
						Hurdle et al. (2005) Kadlec et al. (2012) Malik et al. (2005) Patel et al. (2009) Rahman et al. (1989) Rossi et al. (2016) van Duijkeren et al. (2011) Wendlandt et al. (2013a) Werckenthin et al. (2001)
Quinolones (Fluoroquinolones and other quinolones)	3	3	2	3	2	Aldred et al. (2014) EMA/CVMP (2010) EMEA/CVMP/SAGAM (2007) Poirel et al. (2008)
Rifamycins	2	3	2	2	2	Arlet et al. (2001) Floss and Yu (2005) Tupin et al. (2010)
Riminofenazines	1	1	1	1	1	Grosset et al. (2012) Hartkoorn et al. (2014)
Steroid antibacterials (fusidic acid)	3	3	3	1	4	Bulajic et al. (2017) Chen et al. (2010) Chen et al. (2014) Clark et al. (2015) Loeffler et al. (2008) Nemeghaire et al. (2014) Norström et al. (2009) Obaidat et al. (2018) Sala et al. (2016) Sousa et al. (2017)

Antimicrobial classes, subclasses, substances <sup>††</sup>	Transmission of resistance through successful clone(s)	Horizontal transmission of resistance	Co-selection of resistance	Transmission of resistance through zoonotic or commensal food-borne bacteria	Similarity of resistance	References
						Ugwu et al. (2015)
Streptogramins	3	3	3	2	3	EMA/CVMP/SAGAM (2011) Hershberger et al. (2004) Pyorala et al. (2014) Simjee et al. (2006) Wendlandt et al. (2012) See also pleuromutilins
Sulfonamides, dihydrofolate reductase inhibitors and combinations	3	3	3	3	3	Estrada et al. (2016) Hennequin et al. (2018) Hsu et al. (2014) Sköld (2000) Sköld (2001) Vila-Costa et al. (2017)
Sulfones	1	1	1	1	1	Veziris et al. (2013)
Tetracyclines	3	3	3	3	4	Butaye et al. (2003) Butaye et al. (2006) Chopra and Roberts (2001)
Drugs used solely to treat tuberculosis or other mycobacterial diseases (e.g. isoniazid)	2	2	2	2	2	Ando et al. (2014) Bernardes-Genisson et al. (2013) Gagneux (2012)

# 669 4. Categorisation

670 The new AMEG categorisation builds on the conclusions of the first AMEG report and takes into account 671 recent information and assessments. The criteria for the categorisation have been refined as discussed 672 in Chapter 3, taking as an additional criterion the availability of alternative antimicrobials in veterinary 673 medicine with lower AMR risk to animal and public health. Considering use of the new criterion and 674 taking account of the recommendations included in the reflection papers recently published by the EMA 675 on the use of aminopenicillins and aminoglycosides, an additional category has been included, so that 676 there are now four categories, A to D. For consistency with other existing classifications at the 677 international level, the order of the categories, in terms of level of risk, has now been reversed with 678 the lowest risk category last.

- 679 The updated criteria are as follows:
- 680 1. If the (sub)class or group is authorised for use as a veterinary medicine
- 681 2. The importance of the (sub)class or group to human medicine according to the WHO ranking
  682 and taking into account the EU situation (Tables 2 and 4).
- 3. The <knowledge of factors influencing the> likelihood and possible consequences of AMR
  transfer from animals to humans. In the new categorisation individual mechanisms of
  resistance have been considered more specifically for e.g. those genes associated with mobile
  multiresistance e.g. 'cfr' (Tables 2 and 3).
- 687 4. The availability of alternative antimicrobial (sub)classes in veterinary medicine with lower AMR
  688 risk to animal and public health (Table 4).
- A discussion of the updated criteria is given in sections 3.3 and 3.4 of the report. With regard to the route of administration, this has not been included as a criterion for the categorisation for reasons discussed in 3.3.1. The exception is for steroid antibacterials (fusidic acid) where it was taken into account that this class is only administered locally in animals.
- 693 In this updated advice, all antimicrobial classes were considered for categorisation and a summary of 694 the evidence supporting the application of the criteria and the overall rationale for the categorisation 695 have been added in Table 4. Supporting evidence is derived from published literature, reflection papers 696 on individual antimicrobial classes published by CVMP, and expert opinion, as documented in tables 2, 697 3 and 4 of this report. The categorisations of WHO and OIE, and further WHO documents were also 698 taken into account. For classes in Category A, the only consideration was the absence of authorisation 699 of a substance from the class in a veterinary medicine. The final categorisation for other (sub)classes 700 was based on the judgement of the AMEG in weighting the remaining three criteria, although the key 701 considerations for each category are stated in sections 4.1 to 4.4, below.
- The categorisation should be understood to operate at the level of (sub)classes. Examples of ATC and ATCvet codes for the antimicrobial groups, subgroups and substances included in each AMEG category are provided in Annex A2, Table A2.
- 705 Individual substances not authorised as veterinary medicine themselves, but which belong to a class
- containing molecules that are authorised as veterinary medicines, should be considered as having the
- same categorisation as the parent (sub)class. Although the categorisation may be used to help with

prescribing decisions made under the "cascade"<sup>9</sup>, it cannot take account of all the principles to be
 considered and importantly the welfare of the individual animal(s). Therefore the categorisation does
 not override the complete rules of the prescribing "cascade" in which AMR risk is a factor to consider

711 alongside other criteria as laid out in legislation.

# 712 **Risk management measures to be applied to each category**

- 713 It should be noted that under the new regulation on veterinary medicines (Official Journal of the
  714 European Union, 2019) certain important provisions are included regarding the use of antimicrobials in
  715 animals in order to address the risks to public and animal health from AMR:
- A list is to be established of antimicrobials (or groups of antimicrobials) to be reserved for
   treatment of certain infections in humans only (Article 32). These substances shall not be used
   under the "cascade" to treat animals (Article 111).
- A list is to be established of antimicrobials that shall not be used under the "cascade", or shall
   only be used under the "cascade" subject to conditions (Article 111)
- The use of antibiotic medicinal products for prophylaxis is limited to administration to individual animals only, in exceptional cases, when the risk of infection is very high and the consequences are likely to be severe (Article 111)
- Antimicrobial medicinal products shall only be used for metaphylaxis when the risk of spread of
   infection in the group of animals is high and where no appropriate alternatives are available
   (Article 111).
- 727 The risk management measures applied to the individual AMEG categories should be seen as being 728 complementary to these provisions. As the categorisation is made at the level of (sub)classes of 729 antimicrobials, risk management measures can be indicated at high level, only. These measures are 730 stated in italics for each category below. Further examples of risk management measures that have 731 been applied to certain classes of products (e.g. under CVMP referrals) are available in the Annex to 732 the Commission's Guidelines for the prudent use of antimicrobials in veterinary medicine (European 733 Commission, 2015). Restrictions on the use of certain antimicrobials may also be applied by individual 734 member states on their territory.

# 735 4.1. Category A: "Avoid"

- A number of the antimicrobial (sub)classes listed are not authorised in veterinary medicine and theseare presented separately as Category A.
- 738 Risk management measures: In the absence of established maximum residue limits for foodstuff of
- animal origin, use of these classes of AM in food-producing animals is prohibited and they may only be
- administered to individual companion animals exceptionally, in compliance with the prescribing"cascade".
- 742 The extent of use of these classes, and hence overall selection pressure for AMR, would be low
- provided the restrictions detailed in the prescribing "cascade" are complied with.

<sup>&</sup>lt;sup>9</sup> Articles 10 and 11 of Directive 2001/82/EC. The prescribing "cascade" is a provision in legislation which, when no suitable authorised product is available and under exceptional circumstances, allows a veterinarian to use a veterinary medicinal product outside of its authorised conditions of use, or to use an unauthorised medicine, according to given criteria.

- 744 In the event of a future Marketing Authorisation application for a veterinary medicinal product
- containing a substance in this category, the benefits of use of the proposed veterinary medicine in
- 746 animals are considered alongside a risk assessment that takes account of the importance of the
- substance to human health and the risk of transfer of resistance of relevance for public health from
- 748 treated animals to humans.

# 749 4.2. Category B: "Restrict"

- Classes in HPCIA (see chapter 3.2.1.1. for WHO criteria) are included in Category B with the exceptionof macrolides and those (sub)classes which are not authorized in veterinary medicine in the EU.
- Category B includes quinolones (fluoroquinolones and other quinolones), 3<sup>rd</sup>- and 4<sup>th</sup>-generation
   cephalosporins and polymyxins.
- Risk to public health resulting from veterinary use needs to be mitigated by specific restrictions.
- 755 Risk management measures: These antimicrobials should be considered only for the treatment of
- clinical conditions when there are no alternative antimicrobials in categories C or D that could be
- 757 effective. Especially for this category, use should be based on the results of antimicrobial susceptibility
- 758 *testing, whenever possible*<sup>10</sup>.

## 759 4.3. Category C: "Caution"

- Antimicrobials for which there are alternatives in human medicine for their indications but which comply with one or both of the following criteria:
- For the veterinary indication under treatment, there are few or no alternatives belonging to
   Category D. Some examples of these indications are given in Table 4, alongside the relevant
   (sub)class.
- The antimicrobial selects for resistance to a substance in Category A through specific
   multiresistance genes
- Antimicrobials placed in this category present a higher AMR risk for human and/or animal health thanantimicrobials placed in Category D, as assessed by AMEG.
- 769 Risk management measures: These antimicrobials should only be used when there is no substance in770 Category D that would be effective.

# 771 4.4. Category D: "Prudence"

- 772 Category D includes antimicrobials where there are alternative treatments in human and veterinary
- 773 medicine for their indications and that do not select for resistance to Category A through specific
- 774 multiresistance genes.

<sup>&</sup>lt;sup>10</sup> In accordance with the draft "Guideline on the summary of product characteristics for veterinary medicinal products containing antimicrobial substances" (EMA/CVMP/383441/2005-Rev. 1), the following recommendation is made for all antimicrobial products: 'Use of the product should be based on identification and susceptibility testing of the target pathogen(s). If this is not possible, therapy should be based on epidemiological information and knowledge of susceptibility of the target bacteria at farm level, or at local/regional level.'

- Antimicrobials placed in this category present a lower AMR risk than antimicrobials placed in CategoryC as assessed by AMEG and should be used where possible as first line treatments.
- 777 Risk management measures: These antimicrobials are not devoid of negative impact on resistance
- 778 development and spread. To keep the risk from use of these antimicrobial classes as low as possible it
- is important that responsible use principles are complied with in everyday practice (EMA/EFSA, 2017;
- 780 Official Journal of the European Union, 2015). Unnecessary use and unnecessarily long treatment
- periods should be avoided and group treatment restricted to situations where individual treatment is
- 782 not feasible.

### Table 4. AMEG Categorisation table

783 784 785

Antimicrobial Examples of classes, subclasses, substances <sup>11</sup> in human medicine		WHO <sup>12</sup>	OIE <sup>13</sup>	Use in veterinary medicine	Examples of indications where there are few	AMEG categorisation		Main rationale for
		WIIC	UIL		alternatives in veterinary medicine	previous	new <sup>14</sup>	categorisation
Amidinopenicillins	Multidrug-resistant (MDR) Enterobacteriaceae	HIA	N/D			N/A	A	
Carbapenems and other penems	MDR Gram-negative bacteria (e.g. extended- spectrum beta- lactamase (ESBL)- producing Enterobacteriaceae)	CIA	N/D	Not approved <sup>15</sup>	Not applicable	3	A	
Cephalosporins: Other cephalosporins and penems (ATC code J01DI)	Staphylococci (e.g. MRSA); MDR Streptococcus pneumoniae	НРСІА	N/D			3	A	See chapter 4.1. For these antimicrobials, if at any time in the future an approval is granted for use in veterinary medicine, the antimicrobial class should then be categorised according the defined criteria
Glycopeptides	Staphylococci (e.g. MRSA), MDR Streptococcus pneumoniae, MDR streptococci	НРСІА	N/D			3	A	
Glycylcyclines	MDR Gram-negative bacteria, Staphylococci (e.g. MRSA)	CIA	N/D			3	A	
Lipopeptides	Staphylococci (e.g. MRSA), MDR Enterococcus spp., Streptococcus pneumoniae	CIA	N/D			3	A	
Monobactams	MDR Gram-negative	CIA	N/D	4		3	Α	

<sup>11</sup> Examples of ATC and ATCvet codes for the antimicrobial groups, subgroups and substances included in each AMEG category are provided in Annex A2, Table A2. <sup>12</sup> WHO categorisation: HPCIA>CIA>HIA>IA <sup>13</sup> OIE categorisation: VCIA>VHIA>VIA <sup>14</sup> For polymyxins, the revision of 2016 has been taken into account <sup>15</sup> Approved means approved in at least one Member State

Antimicrobial classes, subclasses,	Examples of important indications	WHO <sup>12</sup> OIE <sup>13</sup>	01E <sup>13</sup>	Use in veterinary medicine	Examples of indications where there are few	AMEG categorisation		Main rationale for
substances <sup>11</sup>	in human medicine	WIIC	UIL		alternatives in veterinary medicine	previous	new <sup>14</sup>	categorisation
	bacteria, especially those producing metallo- beta-lactamases (MBL)							
Oxazolidinones	Staphylococci (e.g. MRSA), MDR Enterococcus spp. (e.g. VRE), MDR Mycobacterium tuberculosis, MDR Streptococcus pneumoniae	CIA	N/D			3	A	
Penicillins: carboxypenicillins and ureidopenicillins combinations with β- lactamase inhibitors	MDR <i>Pseudomonas</i> spp., MDR Enterobacteriaceae	CIA	N/D			3	A	
Phosphonic acid derivates (e.g. fosfomycin)	MRSA, penicillin-non- susceptible S. pneumoniae, MDR E. coli (and other susceptible Enterobacteriaceae), MDR enterococci (e.g. VRE)	CIA	N/D			3	A	
Pseudomonic acid	MDR staphylococci (e.g. MRSA)	HIA	N/D			N/A	A	
Riminofenazines	Leprosy, MDR Mycobacterium tuberculosis	HIA	N/D			3	A	
Streptogramins	Staphylococci (e.g. MRSA), MDR <i>Enterococcus</i> spp. (e.g. VRE)	НІА	VIA			N/A	A	
Sulfones	Leprosy	HIA	N/D			3	A	
Drugs used solely to treat tuberculosis or other mycobacterial	Tuberculosis and other <i>Mycobacterium</i> spp. diseases	CIA	N/D	<u> </u>		3	A	

Antimicrobial classes, subclasses,	Examples of important indications	WHO <sup>12</sup>	OIE <sup>13</sup>	Use in veterinary medicine	Examples of indications where there are few	AMEG categorisat	ion	Main rationale for categorisation
substances <sup>11</sup>	in human medicine	WIIC	OIL	ose in vetermary medicine	alternatives in veterinary medicine	previous	new <sup>14</sup>	
diseases							1	
Cephalosporins, 3 <sup>rd</sup> - and 4 <sup>th</sup> -generation	Acute bacterial meningitis and disease due to <i>Salmonella</i> spp. in children, gonococcal infections	HPCIA	VCIA	Approved for use in food- producing and companion animals. Formulations for use in individual animals only, for systemic and local treatment (recommendations of restrictions apply)	Among few alternatives for treatment of severe (life threatening) sepsis in various animals (Enterobacteriaceae with confirmed or suspected resistance to antimicrobials in Category C and D) Among few alternatives for treatment of respiratory tract infections where AMR to antimicrobials in Category C and D has been confirmed	2	В	
Polymyxins (e.g. colistin)	MDR Pseudomonas aeruginosa, MDR Acinetobacter baumannii and MDR Enterobacteriaceae (Escherichia coli, Klebsiella pneumoniae)	ΗΡCIA	VHIA	Approved for use in food- producing and companion animals. Formulations for use in group and individual animals, for systemic and local treatments (recommendations of restrictions apply).	Among few alternatives for treatment of colibacillosis (e.g. weaning diarrhoea in pigs) ( <i>E. coli</i> with resistance to Category C and D).	2	в	See chapter 4.2.
Quinolones (fluoroquinolones and other quinolones)	Campylobacter spp., Salmonella spp. invasive infection, MDR Shigella spp., Pseudomonas aeruginosa, Streptococcus pneumoniae and MDR tuberculosis	HPCIA	VCIA	Approved for use in food- producing and companion animals. Formulations for use in group and individual animals, for systemic and local treatment (recommendations of restrictions apply).	Among few alternatives for treatment of diarrhoeas in piglets ( <i>E. coli</i> with resistance to Category C and D). Among few alternatives for treatment of severe (life threatening) sepsis in various animals (Enterobacteriaceae with confirmed or suspected resistance to antimicrobials in Category C and D) Few alternatives for treatment of e.g. <i>Aeromonas</i> <i>salmonicida</i> and <i>Flavobacterium</i> spp. in farmed fish (older quinolones)	2	в	
Aminoglycosides and aminocyclitol	Enterococcal endocarditis, MDR Gram- negative bacteria	CIA/IA	VCIA	Approved for use in food- producing and companion animals. Formulations for use	Among few alternatives for treatment of weaning diarrhoea, some alternatives	2	с	Aminoglycosides, including streptomycin are critically important in human

Antimicrobial classes, subclasses,	Examples of important indications	WHO <sup>12</sup>	OIE <sup>13</sup>	Use in veterinary medicine	Examples of indications where there are few	AMEG categorisat	ion	Main rationale for categorisation
substances <sup>11</sup>	in human medicine	unic	UIL .		alternatives in veterinary medicine	previous	new <sup>14</sup>	
	(particularly Enterobacteriaceae and <i>Pseudomonas</i> spp.), MDR tuberculosis			in group and individual animals, for systemic and local treatments.	are Category B. Few alternatives for treatment of infections with <i>Pseudomonas</i> spp. Few alternatives for MDR Enterobacteriaceae, some alternatives are Category B.			medicine. There is a high potential for transmission of AG-resistance determinants between animals and humans. But the risk to human health is lower compared to antimicrobials in Category B. Spectinomycin presents a lower risk than other AGs. See also CVMP reflection paper on Aminoglycosides (EMA/CVMP/AWP, 2018b).
Aminopenicillins in combination with β- lactamase inhibitors (e.g. amoxicillin- clavulanic acid, co- amoxiclav)	Enterobacteriaceae	CIA	VCIA	Approved for use in food- producing and companion animals. Formulations for use in group and individual animals, for systemic and local treatments.	Few alternatives for urinary tract infections in dogs, caused by bacteria that are resistant to alternatives in Category D and some in C Few alternatives for treatment of skin infections with staphylococci in dogs.	2	c	Aminopenicillins combined with beta-lactamase inhibitors are critically important in human medicine. Amoxicillin-clavulanate has a wider spectrum and thus it is likely that it has higher chance to select multidrug resistant organisms, ESBLs and AmpC compared to aminopenicillins alone. There are few or no antimicrobial alternative treatments presenting a lesser risk available for certain indications in veterinary medicine. See also CVMP reflection paper on Aminopenicillins (EMA/CVMP/AWP, 2018a).
Amphenicols (florfenicol & thiamphenicol)	MDR Enterobacteriaceae	HIA	VCIA	Approved for use in food- producing animals as formulations for use in group and individual animals, for	Few alternatives for treatment of e.g. Aeromonas salmonicida and Flavobacterium spp in	N/A	с	Antimicrobial class with high probability of resistance transfer. May lead to resistance to last resort

Antimicrobial classes, subclasses,	Examples of important indications	WHO <sup>12</sup>	OIE <sup>13</sup>	Use in veterinary medicine	Examples of indications where there are few	AMEG categorisation		Main rationale for
substances <sup>11</sup>	in human medicine	WHO	OIE	Use in veterinary medicine	alternatives in veterinary medicine	previous	new <sup>14</sup>	categorisation
				systemic and local treatments. For use in companion animals as formulations for local treatments.	farmed fish, one alternative in Category B. Among few alternatives for treatment of respiratory tract infections caused by bacteria resistant to alternatives in Category D.			antimicrobials class. Several genes can code individually for resistance to amphenicols. Of special concern is the acquisition of either the <i>cfr</i> or <i>optrA</i> genes, since these also encode for resistance to antimicrobial classes of critical importance to human medicine (e.g. oxazolidinones, streptogramin A). However, currently the <i>cfr</i> or <i>optrA</i> genes are considered at a low prevalence in European animal bacterial isolates. Should this situation change to an increased prevalence then the classification of this antimicrobial class may need to be re-assessed. Few or no antimicrobial alternative treatments presenting a lesser risk are available for certain indications in veterinary medicine
Cephalosporins, 1 <sup>st</sup> - and 2 <sup>nd</sup> -generation and cephamycins	Enterobacteriaceae, MSSA, surgical prophylaxis	HIA	VCIA	Approved for use in food- producing and companion animals. Formulations for use in individual animals, for systemic and local treatments.	Few alternatives for treatment of skin infections with staphylococci in dogs	N/A	с	May lead to resistance to last resort antimicrobial class. However, few or no antimicrobial alternatives treatment presenting a lesser risk are available for certain indications in veterinary medicine.
Macrolides	Legionella spp., Campylobacter spp., invasive MDR Salmonella spp. and Shigella spp. infections	HPCIA	VCIA	Approved for use in food- producing and companion animals. Formulations for use in group and individual animals, for systemic and local treatments.	Among few alternative antimicrobials for treatment of haemorrhagic digestive disease in pigs ( <i>Lawsonia</i> <i>intracellularis</i> ). Important for treatment of mycoplasma	1	с	Antimicrobial class with high probability of resistance transfer. For the treatment of zoonotic pathogens (mainly <i>Campylobacter</i> spp.) in

Antimicrobial classes, subclasses,	Examples of important indications	WHO <sup>12</sup>	OIE <sup>13</sup>	Use in veterinary medicine	Examples of indications where there are few	AMEG categorisation		Main rationale for
substances <sup>11</sup>	in human medicine	WHO	OIE		alternatives in veterinary medicine	previous	new <sup>14</sup>	categorisation
					infections in pigs and poultry. Newer macrolides are among few alternatives for treatment of respiratory tract infections caused by bacteria that are resistant to alternatives in Category D. Some alternatives are Category B. Among few alternatives for treatment of foot-rot in sheep and goats.			humans, there are alternative antimicrobials such as fluoroquinolones, although fluoroquinolone resistance in <i>Campylobacter spp.</i> is high in most EU/EEA countries. The <i>erm</i> genes are considered to be of low prevalence in animal isolates of these pathogens in the EU. Should the occurrence of resistance increase the categorisation of this antimicrobial class may need to be re-assessed. Few or no antimicrobial alternative treatments presenting a lesser risk are available for certain indications in veterinary medicine.
Lincosamides	Staphylococci (e.g. MRSA)	НІА	VHIA	Approved for use in food- producing and companion animals. Formulations for use in group and individual animals, for systemic and local treatments.		N/A	с	Cross resistance between macrolides, lincosamides and streptogramins.
Pleuromutilins	<i>Staphylococcus</i> spp. (e.g. MRSA)	IA	VHIA	Approved for use in food- producing species for group and individual animal treatments.	Few or no alternatives for treatment of infections with <i>Brachyspira</i> spp. in pigs	N/A	с	Antimicrobial class with high probability of resistance transfer. May lead to resistance to last resort antimicrobials class especially to linezolid (oxazolidinone). However, few or no antimicrobial alternative treatments presenting a lesser risk is available in veterinary medicine.
Rifamycins	Mycobacterial diseases including tuberculosis	CIA	VHIA	Approved for use in food- producing species for local	Few treatment options for <i>Rhodococcus equi</i> pneumonia	1	с	Rifampin (rifampicin) continues to be part of the

Antimicrobial classes, subclasses,	Examples of important indications	WHO <sup>12</sup>	OIE <sup>13</sup>	Use in veterinary medicine	Examples of indications where there are few	AMEG categorisation		Main rationale for
substances <sup>11</sup>	in human medicine	WHO	OIE	use in veterinary medicine	alternatives in veterinary medicine	previous	new <sup>14</sup>	categorisation
	Adjunct treatment for prosthetic staphylococcal infections, prophylaxis for exposure to <i>N.</i> <i>meningitides</i>			treatment (intramammary formulations).	in horses (in combination with a macrolide)			essential combination antimicrobial treatment for <i>Mycobacterium tuberculosis</i> infections in human medicine. No hazard of zoonotic importance is identified, and extent of use in vet medicine is low. The concerns of its use in veterinary medicine are for the routine off-label use for oral treatment (and sometimes prophylaxis) of <i>Rhodococcus equi</i> infections in foals <sup>16</sup> . Resistance to rifampin develops rapidly and responsible use is essential.
Aminopenicillins, without β-lactamase inhibitors	<i>Streptococcus</i> spp., <i>Enterococcus</i> spp., <i>E.</i> <i>coli, Proteus mirabilis</i>	CIA	VCIA	Approved for use in food- producing and companion animals. Formulations for use in group and individual animals, for systemic and local treatments.	Very important for treatment of many diseases in a broad range of animal species.	2	D	See chapter 4.4. CIA in human medicine due to high extent of use, although alternatives of last resort are available. AMR at high level in some organisms due to extensive use for many decades in both humans and animals. In case of further evidence indicates that veterinary use of aminopenicillins poses an added threat to public health due to animal-to-human resistance transfer, it could then be considered if a distinction in the categorisation should be

<sup>&</sup>lt;sup>16</sup> List of substances essential for the treatment of *equidae*, Official Journal of the European Union. 2013. Commission Regulation (EU) No 122/2013 of 12 February 2013 amending Regulation (EC) No 1950/2006 establishing, in accordance with Directive 2001/82/EC of the European Parliament and of the Council on the Community code relating to veterinary medicinal products, a list of substances essential for the treatment of equidae. In http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1416502774573&uri=CELEX:32013R0122.

Answer to the request from the European Commission for updating the scientific advice on the impact on public health and animal health of the use of antibiotics in animals - Categorisation of antimicrobials EMA/CVMP/CHMP/682198/2017

Antimicrobial classes, subclasses,	Examples of important indications	WHO <sup>12</sup>	OIE <sup>13</sup>	Use in veterinary medicine	Examples of indications where there are few	AMEG categorisat	tion	Main rationale for
substances <sup>11</sup>	in human medicine	WIIG	UIL		alternatives in veterinary medicine	previous	new <sup>14</sup>	categorisation
								made between straight aminopenicillins and narrow- spectrum penicillin
								See also CVMP reflection paper on Aminopenicillins (EMA/CVMP/AWP, 2018a).
								Narrow spectrum penicillins with a lower risk of AMR selection should be used for first line treatment where susceptibility testing suggests the likely efficacy of this approach.
Cyclic polypeptides (bacitracin)	Gram-positive bacteria (topical use)	IA	VHIA	Approved for use in food- producing animals. Formulations for use in group and individual animals, for local treatments.		N/A	D	
Nitrofuran derivatives (e.g. nitrofurantoin)	Enterobacteriaceae (uncomplicated urinary tract infections)	IA	N/D	Approved for use in companion animals only.		N/A	D	
Nitroimidazoles	Anaerobic bacteria, intestinal parasites, C. difficile	IA	N/D	Approved use in companion animals. Formulations for use in individual animals for systemic treatment.	Among the few alternatives available for treatment of anaerobic infections in non- food producing animals.	N/A	D	See chapter 4.4.
Penicillins: Anti- staphylococcal penicillins (β- lactamase-resistant penicillins)	<i>Staphylococcus aureus</i> (e.g. MSSA)	HIA	VCIA	Approved for use in food- producing and companion animals. Formulations for use in individual animals, for local treatments.		1	D	-
Penicillins: Natural, narrow spectrum penicillins (β- lactamase-sensitive penicillins)	Streptococcus spp., Enterococcus spp.	CIA	VCIA	Approved for use in food- producing and companion animals. Formulations for use in group and individual animals, for systemic and local treatments.		1	D	

	Examples of important indications	WHO <sup>12</sup>	OIE <sup>13</sup>	Use in veterinary medicine	Examples of indications where there are few	AMEG categorisation		Main rationale for
substances <sup>11</sup>	in human medicine				alternatives in veterinary medicine	previous	new <sup>14</sup>	categorisation
Steroid antibacterials (fusidic acid)	Staphylococci (e.g. MSSA)	HIA	VIA	Approved for use in companion animals, for use in individual animals for local treatment.		N/A	D	
Sulfonamides, dihydrofolate reductase inhibitors and combinations	Enterobacteriaceae, Staphylococci (e.g. MRSA)	НІА	VCIA	Approved for use in food- producing and companion animals. Formulations for use in group and individual animals, for systemic and local treatments.	No alternatives for treatment of certain protozoal infections.	N/A	D	
Tetracyclines	<i>Brucella</i> spp.	НІА	VCIA	Approved for use in food- producing and companion animals. Formulations for use in group and individual animals, for systemic and local treatments.	No alternatives for treatment of heartwater ( <i>Ehrlichia</i> <i>ruminantium</i> ) and anaplasmosis, although disease with low incidence Fewer alternatives for vector- borne diseases in dogs and cats.	1	D	

### Abbreviations in Table 4:

788 WHO categorisation:

789 HPCIA: Highest Priority Critically Important Antimicrobials 790

CIA: Critically important Antimicrobials

- 791 HIA: Highly Important Antimicrobials
- 792 **IA:** Important Antimicrobials

793 OIE categorisation:

- 794 • VCIA: Veterinary Critically Important Antimicrobials
- 795 • VHIA: Veterinary Highly Important Antimicrobials
- 796 VIA: Veterinary Important Antimicrobials •

#### N/A: not applicable 797

798 N/D: not defined

# 799 **5. Use of AMEG Categorisation**

800 The AMEG has refined the ranking of the antimicrobials by adding an additional category. To harmonise 801 with other lists, the order of the categories has been reversed compared to the first AMEG report. 802 Additionally, in the current scientific advice, those antimicrobial classes which were not included in the 803 previous ranking are also categorised. According to the revised criteria applied for the new 804 antimicrobial categorisations described in chapter 3.3, not only the importance of the antimicrobial 805 class in human medicine and knowledge of factors influencing the likelihood of resistance transfer are 806 considered, but emphasis is now also placed on the importance and the availability of alternatives 807 antimicrobials in veterinary medicine. These additional considerations make the methodology different 808 from other categorisations made by international institutions (e.g. WHO, OIE) and thus the final 809 ranking may differ. It should be noted that the proposed categorisation takes into account both the 810 WHO and OIE lists of CIAs, thereby allowing an appropriate balance between animal health needs, 811 human health needs and public health considerations.

The AMEG proposes to classify antimicrobials in four different categories, from A to D. For communication purposes, key action words have been attributed for each category.

- Category A ("Avoid") corresponds to Category 3 in the first AMEG report, and includes antimicrobial classes not currently authorised in veterinary medicine.
- Category B ("Restrict") corresponds to Category 2 in the first AMEG report, including
   substances listed as HPCIAs by the WHO with the exception of macrolides and those which are
   not authorised as veterinary medicines in the EU. For these antimicrobials, risk to public health
   resulting from veterinary use needs to be mitigated by specific restrictions.
- Category C ("Caution") was added in this report as an intermediate category. This category
   includes antimicrobial classes listed in different categories by WHO, including macrolides, which
   are listed by WHO as a HPCIA. For substances proposed for inclusion in this category, there are
   in general alternatives in human medicine in the EU but there are few alternatives in veterinary
   medicine for certain indications.
- Category D ("Prudence") is the lowest risk category. While the risk to public health associated with the use in veterinary medicine of substances included in this category is considered low, a number of the substances in this category are listed as WHO CIAs (aminopenicillins, natural penicillins and isoxazolylpenicillin).
- 829 This categorisation does not directly translate into a treatment guideline for use of antimicrobials in 830 veterinary medicine, but can be used as a tool by those preparing guidelines. In veterinary medicine, 831 the variety of animal species, the different routes of administration (from intramammary treatment of 832 individual cows to treatment of many hundreds of fish by in-feed medication) and diversity of 833 indications are all factors that have to be taken into account in treatment guidelines. Further, types of 834 production systems, the presence of different diseases and occurrence of antimicrobial resistance may 835 differ between regions. Therefore, treatment guidelines need to be regionally or even locally developed 836 and implemented. Development and implementation of evidence-based national and regional 837 treatment guidelines are encouraged.
- The categorisation itself is not a risk assessment but could be used as an independent guidance
   tool "e.g. for priority setting" as part of the risk analysis.

- 840 This classification may serve as a starting point for discussions on any new further risk • 841 assessments on request from the EC regarding the implementation of the new veterinary 842 regulation (Official Journal of the European Union, 2019).
- 843 The categories could be used to provide background for the consequence assessment of a risk 844 assessment for antimicrobial medicines.
- 845 The categorisation should also be considered as a guidance tool for assessing the importance of • 846 antimicrobials when implementing prudent use measures.

847 Ideally, the criticality of use in veterinary medicine should be directly considered when creating 848 treatment guidelines. For instance, there are situations where a substance could be approved and 849 recommended as the first line treatment for a certain condition in a certain species where there are no 850 effective alternatives even if the substance as such belongs to a category where the risk to public 851 health is considered high. When risk to public health is considered in a benefit/risk perspective it could 852 be that a higher risk level is found acceptable in case of a certain disease/species to be treated. 853 Nevertheless, this reasoning has not been fully applied in this scientific advice due to lack of data on

854 resistance in target animal pathogens.

855 This categorisation should be considered as one element when deciding on when/whether to use a 856 certain class/substance in veterinary medicine but it may not be used as the sole base when creating 857 treatment guidelines, for making decisions about prescribing under the "cascade" or when deciding on 858 risk mitigation activities. It should not be interpreted as a recommendation for treatment guidelines.

859 Antimicrobial categorisation is a complex issue influenced by different factors such as the medical

860 practices, availability and guidelines for antimicrobial therapy, which vary from country to country. 861 Thus, for transparency of the categorisation process, defined criteria, based on evidence and experts'

862 considerations, have been applied to provide a rationale for the ranking of antimicrobial drugs. As the 863 categorisation is part of a dynamic process the relative importance of an antimicrobial and its usage

- 864 could evolve over time due to changes in factors that determine the drug efficacy, e.g. emergence of
- 865 resistance, the availability of new drugs in the market, or due to identification of a new indication. This
- 866 categorisation should therefore be periodically (e.g. in 5 years) reviewed and, if necessary, revised on

867 the basis of new scientific evidence or emerging information on changing patterns of antimicrobial use 868 and/or resistance trends.

#### Annex 1 - The WHO list in an EU perspective 869

- 870 The list of substances and definitions for the WHO Criteria 1 and 2 are applicable for the EU. As
- 871 indicated in the WHO list of critically important antimicrobials, "the implementation of the concept at
- 872 the national level required that national considerations would be taken into account, and consequently
- lists may vary from country to country". 873
- 874 Some comments are added in Table 2, addressing specifically the EU situation.
- 875 Table A1 presents an amended version of the WHO list of CIAs and HIAs modified to consider EU
- 876 particulars. To reduce the number of items in the list, the antimicrobials are mainly presented as
- 877 classes although some unique characteristics for individual subclasses or substances are presented as
- 878 appropriate. The list is not exhaustive as some classes/substances on the WHO list but of less
- 879 importance for human medicine in EU are omitted. For each class/compound, examples among the
- 880 most important infective agents are listed. These agents are bacteria causing infections against which
- 881 there are few treatment alternatives. Depending on resistance pattern/s, a listed compound may be

- the sole available treatment. Some of these bacteria (or their resistance genes) do have an animal
- reservoir and thus, in a sense, be zoonotic. In some cases resistance has been shown to spread
- between animals and humans, in other cases such transfer remains a theoretical possibility. Hazards
- 885 ("bug/drug combinations", i.e. the bacteria when resistant against the antimicrobial in question) that
- might in theory have such a zoonotic potential are listed in a separate column.
- 887 **Table A1.** Hazard of zoonotic relevance as identified by AMEG for antimicrobials that fulfil WHO
- 888 criterion 1

Antimicrobial class	Bacterial targets in human medicine (for which availability of class/substance is critically important due to few alternatives)	Hazard of potential zoonotic relevance
Aminoglycosides	<ul> <li>Enterococcal endocarditis</li> <li>Multidrug-resistant (MDR) Gramnegative bacteria (particularly Enterobacteriaceae and <i>Pseudomonas</i> spp.)</li> <li>(MDR) tuberculosis</li> </ul>	Enterobacteriaceae Enterococcus spp.
Carbapenems and other penems	<ul> <li>Multidrug-resistant (MDR) Gram- negative bacteria (e.g. Enterobacteriaceae)</li> </ul>	Enterobacteriaceae
Cephalosporins, 3 <sup>rd</sup> - and 4 <sup>th</sup> -generation	<ul> <li>Acute bacterial meningitis and disease due to <i>Salmonella</i> spp. in children</li> <li>Gonococcal infections</li> </ul>	Enterobacteriaceae
Ceftaroline and ceftobiprole <sup>17</sup>	<ul> <li>MDR staphylococci (e.g. MRSA)</li> <li>Penicillin non-susceptible Streptococcus pneumoniae (PNSP)</li> </ul>	MRSA
Cyclic esters (e.g. fosfomycin) <sup>18</sup>	<ul> <li>ESBL ( extended-spectrum beta- lactamases)-producing <i>E. coli</i> causing UTI</li> <li>MDR Gram-negative bacteria (IV formulation)</li> </ul>	Enterobacteriaceae
Fluoroquinolones and other quinolones	<ul> <li>Campylobacter spp.</li> <li>Invasive Salmonella spp. infection</li> <li>MDR Shigella spp.</li> <li>Pseudomonas aeruginosa, PNSP and MDR TB (tuberculosis) (intravenous/oral)</li> </ul>	<i>Campylobacter</i> spp. Enterobacteriaceae
Glycopeptides	<ul><li>MDR staphylococci (e.g. MRSA),</li><li>PNSP</li></ul>	<i>Enterococcus</i> spp. MRSA
Glycylcyclines	<ul> <li>MDR Gram-negative bacteria</li> <li>MDR staphylococci (e.g. MRSA)</li> </ul>	MRSA Enterobacteriaceae
Lipopeptides	MDR staphylococci (e.g. MRSA)	Enterococcus spp.

 $^{17}$  Included in "Other cephalosporins and penems, ATC code J01DI" in other tables of the document.  $^{18}$  Included in "Phosphonic acid derivates" in other tables of the document.

Antimicrobial class	Bacterial targets in human medicine (for which availability of class/substance is critically important due to few alternatives)	Hazard of potential zoonotic relevance
	<ul><li>MDR <i>Enterococcus</i> spp.</li><li>PNSP</li></ul>	MRSA
Macrolides (including ketolides)	<ul> <li><i>Legionella</i> spp.</li> <li><i>Campylobacter</i> spp.</li> <li>Invasive MDR <i>Salmonella</i> spp. and <i>Shigella</i> spp. infections</li> </ul>	<i>Campylobacter</i> spp. Invasive <i>Salmonella</i> spp.
Monobactams	<ul> <li>MDR Gram-negative bacteria, especially those producing metallo- beta-lactamases (MBL)</li> </ul>	Enterobacteriaceae
Oxazolidinones	<ul> <li>MDR staphylococci (e.g. MRSA)</li> <li>MDR <i>Enterococcus</i> spp. (e.g. VRE)</li> <li>MDR TB</li> <li>PNSP</li> </ul>	<i>Enterococcus</i> spp. MRSA
Penicillins, Natural	Syphilis	None identified
Penicillins: Aminopenicillins including combinations with β-lactamase inhibitors (e.g. amoxicillin + clavulanic acid)	<ul> <li><i>Listeria</i> spp.</li> <li><i>Enterococcus</i> spp.</li> </ul>	<i>Enterococcus</i> spp. Enterobacteriaceae
Penicillins: Carboxy- penicillins and ureido- penicillins	<ul> <li>MDR <i>Pseudomonas</i> spp.</li> <li>MDR Enterobacteriaceae (temocillin)</li> </ul>	Enterobacteriaceae
Polymyxins	MDR Enterobacteriaceae	Enterobacteriaceae
Rifamycins	<ul> <li>Mycobacterial diseases including tuberculosis</li> </ul>	None identified
Riminofenazines	<ul><li>Leprosy</li><li>MDR TB</li></ul>	None identified
Sulfones	Leprosy	None identified
Tetracyclines	• Brucella spp.	Brucella spp.
Drugs used solely to treat tuberculosis or other mycobacterial diseases (in particular, isoniazid, pyrazinamide, ethambutol and capreomycin)	<ul> <li>Tuberculosis and other Mycobacterium spp. diseases</li> </ul>	None identified

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# 891 Annex 2 - ATC and ATCvet codes

## 892 Table A2. Examples of ATC and ATCvet codes

AMEG categories	Antimicrobial groups, subgroups and substances	Examples of ATC code(s)	Examples of ATCvet code(s)
Α	Amidinopenicillins	J01CA08 (pivmecillinam), J01CA11 (mecillinam)	QJ01CA08 (pivmecillinam), QJ01CA11 (mecillinam)
Α	Carbapenems	J01DH	QJ01DH
Α	Other cephalosporins* and penems	J01DI	QJ01DI
Α	Glycopeptides	JO1XA	QJ01XA
Α	Glycylcyclines	J01AA12 (tigecycline)	QJ01AA12 (tigecycline)
Α	Lipopeptides	J01XX09 (daptomycin)	QJ01XX09 (daptomycin)
Α	Monobactams	J01DF	QJ01DF
Α	Oxazolidinones	J01XX08 (linezolid), J01XX11 (tedizolid)	QJ01XX08 (linezolid), QJ01XX11 (tedizolid)
A	Penicillins: Carboxypenicillins and ureidopenicillins, including combinations with β- lactamase inhibitors	J01CA03 (carbenicillin), J01CA09 (azlocillin), J01CA10 (mezlocillin), J01CA12 (piperacillin), J01CA13 (ticarcillin), J01CR03 (ticarcillin and β-lactamase inhibitor), J01CR05 (piperacillin and β-lactamase inhibitor)	QJ01CA03 (carbenicillin), QJ01CA09 (azlocillin), QJ01CA10 (mezlocillin), QJ01CA12 (piperacillin), QJ01CA13 (ticarcillin), QJ01CR03 (ticarcillin and β- lactamase inhibitor), QJ01CR05 (piperacillin and β-lactamase inhibitor)
Α	Phosphonic acid derivates	J01XX01 (fosfomycin)	QJ01XX01 (fosfomycin)
Α	Pseudomonic acid (mupirocin)	D06AX09, R01AX06	QD06AX09, QR01AX06
Α	Riminofenazines	J04BA01 (clofazimine)	QJ04BA01 (clofazimine)
Α	Streptogramins	J01FG	Q01FG, QJ01FG90 (virginiamycin)
Α	Sulfones	J04BA02 (dapsone)	QJ04BA02 (dapsone)
A	Drugs used solely to treat tuberculosis or other mycobacterial diseases	J04AA, J04AC, J04AD, J04AK, J04AM	QJ04AA, QJ04AC, QJ04AD, QJ04AK, QJ04AM
В	Cephalosporins, 3 <sup>rd</sup> - and 4 <sup>th</sup> -generation	J01DD, J01DE	QJ01DD, QJ01DE
В	Polymyxins (e.g. colistin)	J01XB, A07AA10 (colistin), A07AA05 (polymyxin B)	QJ01XB, QJ51XB, QA07AA10 (colistin), QA07AA05 (polymyxin B), QA07AA98 (colistin, combinations with other antibiotics), QJ01RA95 (polymyxins, combinations with other antibacterials) QG51AG07 (ampicillin and colistin)
В	Quinolones: fluoroquinolones and other quinolones	ЈО1МА, ЈО1МВ	QJ01MA, QJ01MB
с	Aminoglycosides and aminocyclitol	J01GA, J01GB, A07AA (includes locally acting aminoglycosides), J04AB30 (capreomycin)	QJ01GA, QJ01GB, QJ51GA, QJ51GB, QJ51RG, QJ01RA97, QA07AA (includes locally acting aminoglycosides, QA07AA01

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AMEG categories	Antimicrobial groups, subgroups and substances	Examples of ATC code(s)	Examples of ATCvet code(s)
			(neomycin))
с	Aminopenicillins, in combination with β- lactamase inhibitors (e.g. amoxicillin- clavulanic acid, co- amoxiclav)	J01CR	QJ01CR
С	Amphenicols	J01BA	QJ01BA
с	Cephalosporins, 1 <sup>st</sup> - and 2 <sup>nd</sup> -generation, and cephamycins	J01DB, J01DC	QJ01DB, QJ01DC
C C	Macrolides	J01FA	QJ01FA
С	Lincosamides	J01FF	QJ01FF
С	Pleuromutilins	<u> </u>	QJ01XQ
c	Rifamycins	J04AB02 (rifampicin), J04AB03 (rifamycin), J04AB04 (rifabutin) and J04AB05 (rifapentine), J04AM02/J04AM05/J04A M06 (rifamycin combinations) A07AA11 (rifaximin), A07AA13 (new code rifamycin)	QJ04AB02/QJ54AB02 (rifampicin), QJ04AB03/QJ54AB03 (rifamycin), QJ04AB04 (rifabutin) and QJ04AB05 (rifapentine), QJ04AM02/QJ04AM05/QJ04 AM06 (rifamycin combinations), QA07AA11 (rifaximin), QA07AA13 (new code rifamycin)
D	Aminopenicillins, without β-lactamase inhibitors	QJ01CA01 (ampicillin), QJ01CA03 (amoxicillin), QJ01CA51 (ampicillin, combinations)	QJ51CA01 (ampicillin), QJ51CA03 (amoxicillin), QJ51CA51 (ampicillin, combinations), QG51AG04/05/07 (different ampicillin combinations) QJ01XX10 (bacitracin),
D	Cyclic polypeptides (bacitracin)	J01XX10 (bacitracin)	QA07AA93
D	Nitrofuran derivatives (e.g. nitrofurantoin)	J01XE, P01CC, A07AX03 (nifuroxazide), A07AX04 (nifurzide)	QJ01XE, QP51AC, QA07AX03 (nifuroxazide), QA07AX04 (nifurzide)
D	Nitroimidazoles	J01XD, P01AB	QJ01XD, QP51AA
D	Penicillins: Anti- staphylococcal penicillins (β-lactamase-resistant penicillins)	J01CF	QJ01CF, QJ51CF
D	Penicillins: Natural, narrow-spectrum penicillins (β-lactamase- sensitive penicillins)	J01CE	QJ01CE, QJ51CE
D	Steroid antibacterials (fusidic acid)	J01XC	QJ01XC
D	Sulfonamides, dihydrofolate reductase inhibitors and	J01EA, J01EB, J01EC, J01ED, J01EE, A07AB	QJ01EA, QJ01EQ, QJ01EW, QP51AG, QJ51E, QJ51RE, QA07AB

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AMEG categories	Antimicrobial groups, subgroups and substances	Examples of ATC code(s)	Examples of ATCvet code(s)
	combinations		
D	Tetracyclines	J01AA, J01RA08	QJ01AA, QJ51A, QJ51RA, QJ01RA90 (tetracyclines, combinations with other antibacterials), QJ01RA08

\*Other than 1<sup>st</sup>-, 2<sup>nd</sup>-, 3<sup>rd</sup>- and 4<sup>th</sup>-generation

Disclaimer: This table is only indicative and should not replace the ATC/DDD Index (<u>link</u>) and ATCvet
 Index (<u>link</u>).

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