

EC Call for Views – ‘Fight against antimicrobial resistance – ban on certain antimicrobials in animals / animal products imported into the EU’

The British Agriculture Bureau (BAB) represents the collective interests of the UK farming unions in Brussels, representing more than 70,000 farmer and grower members. BAB welcomes the opportunity to respond to the European Commission’s consultation on the ‘Fight against antimicrobial resistance – ban on certain antimicrobials in animals / animal products imported into the EU’.

UK and EU farmers, growers and producers are proud of their high production standards – whether in terms of food safety, environmental performance or animal health and welfare – and all are committed to delivering increased production standards whilst ensuring national and international food security.

Antimicrobial resistance is a serious threat to human and animal health, and farmers across the UK support ambitions to mitigate antimicrobial resistance. For many years, UK farmers and producers have demonstrated a progressive and responsible attitude to the use of veterinary medicines. We have an ongoing commitment to mitigate the risks of developing antimicrobial resistance (AMR), where in 2019, the UK Government outlined both a 5-year action plan and 20-year vision on how the UK will contribute to controlling AMR. Furthermore, whilst the UK has now left the EU, the UK regulatory framework remains aligned with that of the European Union.

The UK Government continues to recognise the European Medicines Agency’s categorisation of medicines and remain compliant with the categorisations and supportive of the prohibition on using antimicrobials for growth promotion or yield increases. We can demonstrate that the use of veterinary medicines listed as reserved for the treatment of certain infections in humans are restricted in the UK, in accordance with Regulation (EU) 2019/6 of the European Parliament and the Council. We are confident that the UK will meet the criteria to be included as a third country in the list in accordance with the requirements laid down in Article 127(3) of Regulation (EU) 2017/625.

The UK agriculture sector has built its response to AMR around ‘One Health’ principles and farmers are committed to protecting consumers and public health alongside animal health and welfare. Farmers and vets have been actively involved in strategies which enhance animal health and welfare since 2014/15, including data collection, the use of vaccines, training and good husbandry as means of preventing animal health challenges. These have been co-ordinated through the Responsible Use of Medicines in Agriculture Alliance (RUMA) – a multi-stakeholder platform which brings all interested parties across all nations of the UK together under a One Health objective of responsible use of medicines. RUMA has achieved international recognition, including within Europe, for its leadership.

Furthermore, as shown by the EU’s [ESVAC](#) reporting structure, the UK and European Union Member States follow the same sales data recording systems for veterinary medicines, and undertake complementary surveillance for resistance. The UK results are submitted to ESVAC and then published, in an accessible format, by the UK’s Veterinary Medicines Directorate in their annual VARSS report. The UK farming unions believe that this level of national reporting and submission should provide sufficient ongoing evidence of compliance negating the need for additional certification.

As UK farmers follow the European Medicines Agency’s categorisation of medicines and do not use antimicrobials for growth promotion or yield increases, the UK farming unions believe it would be disproportionate for the European Union to potentially request compliance conditions and certification. Furthermore, if these requests were made, this could result in higher controls and checks in the UK than those practised within the boundaries of the Union’s trading block.

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Regarding the conditions relating to the compliance checks and the need for certification, we would request the Commission to ensure that an appropriate balance is considered which does not prejudice or disadvantage the UK farming and veterinary sector by adding additional, and unnecessary, cost and burden to our food producers.

In summary, the UK farming unions request the following:

- The European Union considers the UK as an exceptional case amongst its listed countries and does not demand additional, burdensome certification confirming compliance with the Union’s conditions via the Official Controls Export Health Certificate.
- Instead, we propose we utilise our close and collaborative relationship and shared knowledge of our regulatory frameworks alongside the ongoing, evidenced record of accomplishment and efforts within this policy area.

As supporting evidence of the UK’s commitment to the prudent use of antimicrobials in food producing animals, we submit 3 documents:

- 1) The VMD’s [Veterinary Antimicrobial Resistance and Sales Surveillance 2021 report](#) (VARSS)
- 2) An [FAO / VMD report](#) showcasing the UK’s actions around the responsible use of medicines (2022)
- 3) The latest update from [RUMA](#) detailing the voluntary actions of the agricultural sector to reduce, refine and replace antibiotics. (2022)

These 3 complementary documents show how the UK has reduced its reliance on the use of antimicrobials in food production since 2014, whilst protecting the health and welfare of our farmed livestock and maintaining food safety for our consumers.

The UK has been, and continues to be, at the forefront of responsible use and demanding further certification would be disproportionate to the risk as it relates to the UK, and overly burdensome in terms of additional cost and veterinary resource.

UK farmers and producers are committed to work with the EU to ensure that efforts to mitigate against AMR continues, but calls for proportionality in regulation, especially at this time of universal challenges in veterinary resource and supply chain difficulties.