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4 Principles on assignment of defined daily dose for animals
5 (DDDA) and defined course dose for animals (DCDA)
6 Draft

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84 1. Summary

85 These draft principles describe the approach suggested for the assignment of defined daily dose for
86 animals (DDDA) and defined course dose for animals (DCDA) for antimicrobial veterinary medicinal
87 products (VMP) and the principles themselves. The principles aim to guide EMA on the assignment of
88 DDDAs and DCDAs. A summary of the suggested principles is included in Chapter 2.

89 These principles may be subjected to exceptions that will be clearly identified when publishing the
90 DDDA and DCDA values.

91 The definitions and units suggested to be applied are described in Chapter 8 and the general principles
92 in Chapter 9. These principles are based on the aim of assignment of DDDAs and DCDAs (Chapter 6).
93 Impact analyses as well as other assessments and considerations are outlined in Appendix 1, including
94 some examples for reporting of data by use of DDDA and DCDA.

95 The development of the draft principles has been assisted by an ad hoc working group on technical
96 units of measurement that also participated in the development of the “ESVAC reflection paper on
97 collecting data on consumption of antimicrobial agents per animal species, on technical units of
98 measurement and indicators for reporting consumption of antimicrobial agents in animals”
99 (EMA/ESVAC, 2013b).

100 The suggested principles for assigning DDDAs for veterinary medicinal products have, to the extent
101 possible, been harmonised with principles for human medicinal products in order to facilitate
102 comparability of antimicrobial consumption in animals with consumption in humans.

103 Although the principles are developed based on data for antimicrobial agents, they are in general
104 considered to be applicable in the future for other veterinary therapeutic agents. For some therapeutic
105 agents such as antiparasitics with an intermittent dosing schedule, the approach and recommendations
106 would have to be further explored.

107 Antimicrobial growth promoters (AGPs) are not authorised in the European Union and European
108 Economic Area (EU/EEA) countries and thus the principles do not address AGPs; the DDDAs and
109 DCDAs should not be used to analyse and report consumption of AGPs since dosing of these is
110 generally much lower than the therapeutic dosing.

111 Data on dosing (daily dose and number of days of treatment) obtained from Summaries of Product
112 Characteristics (SPCs) for antimicrobial veterinary medicinal products were provided for broilers, cattle
113 and pigs by nine EU-countries: Czech Republic, Denmark, Finland, France, Germany, the Netherlands,
114 Spain, Sweden and United Kingdom using a predesigned template. These nine countries covered
115 approximately 65% of the food-producing animals in the EU in 2012. The data cover the following
116 administration routes/forms: bolus, tablets, oral paste, oral powder, oral solution and premix (long-
117 acting) injectables, intramammary products and intrauterine devices.

118 The data obtained on dosing were validated in terms of quality and harmonization across the nine
119 countries and preliminary DDDAs and DCDAs were assigned following exclusion of outliers. The final
120 data sets on oral and injectables consisted of 2,199 unique records containing information on daily
121 dose and number of treatment days for single substance VMPs indicated for either broiler, cattle or pig;
122 for VMPs containing active substances in combination (with the majority containing 2 ingredients) the
123 data sets consisted of 688 unique records for each substance in a combination VMP.

124 Preliminary DDDAs and DCDA and the sales data for 26 EU/EEA countries and specific Member States
125 (MSs) in 2012 were used for various impact analyses and other assessments, and the outputs of these
126 as well as general considerations served as the basis for the development of the draft principles.

127 DDDAs and DCDA will be assigned per kg animal for oral and injectable products providing a basis for
128 calculation and reporting DDDAs and DCDA by weight group.

129 It is suggested to assign separate DDDAs for injectables, intramammary products, intra-uterine
130 devices and oral products for each substance and species.

131 The impact analyses (see Appendix 1) have shown that similar approaches and principles can be
132 applied to derive DDDA and DCDA for antimicrobials used in veterinary medicine as are applied to
133 derive DDD in human medicine. However, there are differences in the type of products sold, such as
134 much greater sales of combination antimicrobial products in veterinary medicine, and the way in which
135 products are used, such as a much greater range of oral dosage forms in veterinary medicines. These
136 differences mean that different assumptions are sometimes necessary when deciding how particular
137 DDDAs and DCDA are assigned.

138 Overall, there is a much larger number of 'use cases' for antimicrobials in veterinary medicine than
139 human medicine due to both the need to treat different species and to the need for a wider range of
140 dose forms to be able to treat animals of different species and animals of the same species kept under
141 different husbandry conditions.

142 In defining DDDA and DCDA a degree of pragmatism is therefore required to reach the right balance
143 between having a highly complex but accurate system in which a DDDA/DCDA is defined for every
144 possible 'use case' and having a more simple system in which similar 'use cases' are combined
145 requiring fewer DDDAs/DCDA to be defined.

146 Based on analyses of actual data on consumption, these principles have been able to show those
147 situations where 'use cases' can, and cannot, be combined without having a major impact on the
148 outcome in terms of estimated DDDA or DCDA. Taking into account that DDDA and DCDA are technical
149 units of measurement and not measurements of actual consumption, the principles and methods put
150 forward in this document are considered to represent the optimum balance between accuracy and
151 practicability.

152 Note that in this document DDDA and DCDA refers to the value assigned per kg animal unless
153 otherwise indicated.

154 **It should be noted that DDDA and DCDA are technical units of measurement solely intended**
155 **for the purpose of drug consumption studies. They should not necessarily be assumed to**
156 **reflect the daily doses recommended or prescribed. The assigned DDDA and DCDA values**
157 **will nearly always be a compromise. Established DDDAs or DCDA are not applicable for**
158 **commercial use such as pricing and analyses of drug costs.**

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162 **2. Summary – recommendations principles**

163 Table 1 summarize the general principles recommended for the assignment of DDDAs and DCDA. The
 164 general principles (chapter 9) and Appendix 1 suggest exceptions from these rules for example for
 165 synergistic combinations and assignment of separate DCDA for premix for pigs. Exception to the
 166 principles will be explained in the lists of DDDAs and DCDA.

167 **Table 1.** Summary of the calculation of DDDAs and DCDA and the suggested general principles for
 168 assignment of DDDAs and DCDA for each combination of substance, species and form. Single equals
 169 to VMPs with one active substance; Combinations equals to VMPs with two (or more) active substances

Unit of measurement	Calculation	Oral single	Oral combinations	Injectables single	Injectables combinations
• DDDA	• Calculated as average of all observations on daily dose by species, substance and form.	• Assign the same DDDA for all oral forms.	• Assign the same DDDA as for oral single forms.	• Assign the same DDDA for injectables and long-acting injectables. • Prodrugs will be assigned separate DDDA.	• Assign the same DDDA as for single injectables, long-acting injectables and prodrugs.
• DCDA	• Calculated as average of all observations – daily dose multiplied by number treatment days – by species, substance and form.	• Assign the same DCDA for all oral forms.	• Assign the same DCDA as for oral single forms.	• Assign the same DCDA for injectables and long-acting injectables. • Prodrugs will be assigned separate DCDA.	• Assign the same DCDA as for single injectables, long-acting injectables and prodrugs.

170

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193 4. Terms and abbreviations

- 194 • Average = weighted arithmetic mean
- 195 • ATC = Anatomical Therapeutic Chemical classification system
- 196 • ATCvet = Anatomical Therapeutic Chemical classification system for veterinary medicinal products
- 197 • Broilers = slaughter chicken
- 198 • CIA = critically important antimicrobials
- 199 • Combination VMP = veterinary medicinal product that contains more than one antimicrobial active
200 substance
- 201 • DCDA = defined course dose animal
- 202 • DDD = defined daily dose (human)
- 203 • DDDA = defined daily dose animal
- 204 • Dosing = daily dose and number of treatment days
- 205 • DC = dry cow (period) = period between the end of lactation and calving
- 206 • Duration of effect = time period during which a VMP is active in the treated animal; longer than 24
207 hours for long-acting products
- 208 • Injectables long-acting (LA) = duration of effect of one dose > 24 hours
- 209 • EC = European Commission
- 210 • ESAC-Net = European Surveillance of Antimicrobial Consumption Network
- 211 • ESVAC = European Surveillance of Veterinary Antimicrobial Consumption
- 212 • ESVAC national sales register = register of antimicrobial VMPs: name, form, pack size, active
213 ingredient(s) and strength(s)
- 214 • EU/EEA = European Union and European Economic Area
- 215 • MS = Member State
- 216 • Observation = one record containing information on daily dose and number of treatment days for
217 one substance in a VMP for one species
- 218 • PDD = prescribed daily doses
- 219 • Prodrug = inactive or less than fully active chemical form converted to its active chemical form
220 through a normal metabolic process, such as hydrolysis of an ester, after administration
- 221 • Single substance VMP = veterinary medicinal product that contains only one antimicrobial active
222 substance
- 223 • SD = standard deviation
- 224 • Treatment duration = number of treatment days
- 225 • UD = unit dose
- 226 • VMP = veterinary medicinal product
- 227 • WHO = World Health Organization
- 228 • WHO CC = WHO Collaborating Centre for Drug Statistic Methodology

229 5. Introduction

230 The European Surveillance of Veterinary Antimicrobial Consumption (ESVAC) project was launched in
231 September 2009, following a request from the European Commission (EC) to develop an approach for
232 the harmonised collection and reporting of data on the use of antimicrobial agents in animals in the
233 MSs [SANCO/E2/KDS/rz D(2008) 520915]. Through the terms of reference from the EC, the Agency
234 was requested, among other activities:

- 235 • To develop a harmonised approach for the collection and reporting of data based on national sales
236 figures, combined with estimations of usage in at least major groups of species (poultry, pigs, veal
237 calves, other ruminants, pets and fish);
- 238 • To collect the data from Member States and manage the database;
- 239 • To draft and publish a summary annual report with the data from Member States.

240 With regard to the data collection:

- 241 • Comparability with the sale/use of antimicrobials in humans should be ensured.

242 As a first step existing data from nine European countries (2005-2009) were collected and published in
243 a harmonised manner (EMA/ESVAC, 2011). Furthermore, ESVAC has implemented a system for the
244 collection of harmonised and validated data on national sales figures of veterinary antimicrobial agents
245 detailed at package level. Such data have been published annually for the years 2010-2012.
246 (EMA/ESVAC, 2011; EMA/ESVAC, 2012; EMA/ESVAC, 2013a; EMA/ESVAC, 2014). These data provide
247 information on overall sales, sales by antimicrobial class/subclass and sales by pharmaceutical form.

248 In order to develop a harmonised approach for collecting data by species, an "ESVAC reflection paper
249 on collecting data on consumption of antimicrobial agents per animal species, on technical units of
250 measurement and indicators for reporting consumption of antimicrobial agents in animals" was
251 developed and published on 10 October 2013 (EMA/ESVAC, 2013b). It suggests collecting data on
252 consumption for cattle, pigs and poultry and as a first step a pilot collecting data on consumption in
253 pigs in volunteering EU/EEA countries is planned to be rolled out mid-2015.

254 Following the suggestion of the reflection paper, ESVAC will as a first step collect data on consumption
255 for the following species: broiler, cattle and pigs and consequently assignment of DDDAs and DCDA
256 for these species-production categories is prioritized.

257 The reflection paper further suggests applying DDDA and DCDA for the analysis of consumption data
258 by species in order to take into account differences in dosing (daily dosing and length of treatment) for
259 the various antimicrobials when reporting data. Furthermore, it is proposed to apply information on
260 dosing (daily dose and number of days of treatment) obtained from SPCs as the basis for establishing
261 the same DDDA and DCDA for similar products – i.e. active substance and pharmaceutical form by
262 species – as these are available for all MSs and the information is generally available on the websites
263 of the national medicines agencies, thus ensuring transparency.

264 This document suggests principles for the assignment of DDDA and DCDA for veterinary antimicrobial
265 agents. The impact analyses, other assessments and considerations supporting the suggested
266 principles are described in Appendix 1.

267 These principles are in general thought to be applicable if in the future DDDAs and DCDA will be
268 assigned for other veterinary therapeutic agents; however, for some therapeutic agents such as for

269 antiparasitic medicines with an intermittent dosing schedule, this has to be further explored and the
270 principles revised if required.

271 The list of DDDAs and DCDA's will be used to analyse and report data on consumption by species
272 collated by ESVAC.

273 Reporting consumption of antimicrobials in animals using DDDA or DCDA represents a substantial
274 improvement over reporting consumption by weight (mass) of active substance. DDDA and DCDA take
275 into account that the number of animals that can be treated with a fixed weight of an antimicrobial
276 varies greatly depending on the dose (in terms of mass) that is required for each treatment.

277

278 **6. Aim of assignment of DDDA and DCDA in the context of**
279 **AMR**

280 In human medicine the defined daily dose (DDD) was established in the mid-1970s for the purpose of
281 drug consumption studies, mainly in order to follow therapeutic trends. This aim is reflected in the
282 Guidelines for ATC classification and DDD assignment published by the World Health Organization
283 Collaborating Centre for Drug Statistics Methodology (WHO CC) (WHO, 2015b). The WHO CC was
284 established in Oslo in 1982 and is responsible for maintaining the guidelines as well as maintaining the
285 list of DDDs.

286 The aim of surveillance of antimicrobial consumption in animals is multiple as described in the
287 Appendix of the request from the EC to the Agency to take the lead in collecting data on the use of
288 antimicrobials in animals:

- 289 1. To aid interpretation of patterns and trends regarding antibacterial resistance;
- 290 2. As a basis for risk profiling and risk assessment regarding antibacterial drug resistance;
- 291 3. As a basis for setting risk management priorities;
- 292 4. As a basis for evaluation of the effectiveness of control measures being implemented;
- 293 5. To identify emerging use of antibacterial drugs, e.g. of specific drug classes such as critically
294 important antibiotics;
- 295 6. To aid comparison of usage of antibacterial drugs between and within countries and between
296 time periods etc.;
- 297 7. To assess the spread and effect of antibacterial drug pollution of the environment;
- 298 8. As a basis for focused and targeted research and development.

299 The WHO guidelines (WHO, 2015b) emphasize that the DDD is nearly always a compromise based on
300 review of the available information on dosing; furthermore, it underlines that the DDD is a technical
301 unit of measurement solely intended for drug consumption studies and therefore cannot be assumed to
302 represent the real daily doses applied. This is also applicable for veterinary medicine.

303 Through the terms of reference from the EC, the Agency was requested, among other, to ensure
304 comparability with human medicine.

305 In order to facilitate comparison of the consumption of antimicrobials by humans and animals, the
306 principles for assignment of DDDAs (and DCDA) are harmonized with the principles for assignment of
307 DDDs in human medicine to the greatest extent possible. It should be noted that in human medicine
308 only DDDs have been assigned and not defined course doses.

309

310 **7. Antimicrobial agents and animal species for which DDDAs**
311 **and DCDA will be assigned**

312 DDDA and DCDA will be assigned for antimicrobial agents belonging to the ATCvet groups shown in
313 Table 2 for oral, injectable, intramammary injectors and intrauterine devices.

314 DDDAs and DCDA will not be assigned for topical pharmaceutical forms (dermatological products,
315 those for eye and ear and cutaneous spray) as it is complex to establish the dose. This is in line with
316 the approach applied for human medicine (WHO, 2015b). It should be noted that ESVAC data from five
317 EU/EEA countries show that sales of topical forms for animals accounted for between 0.002%–0.49%
318 of total sales in 2012 (EMA/ESVAC, 2014).

319 DDDAs and DCDA are intended to be assigned for broilers, cattle and pigs.

320 **Table 2.** Veterinary antimicrobial agents for which DDDA and DCDA will be assigned according to
321 ATCvet codes) (WHO, 2015a)

Groups of antimicrobial agents	ATCvet codes
Antimicrobial agents for intestinal use	QA07AA; QA07AB
Antimicrobial agents for intrauterine use	QG01AA; QG01AE; QG01BA; QG01BE QG51AA; QG51AG
Antimicrobial agents for systemic use	QJ01
Antimicrobial agents for intramammary use	QJ51
Antimicrobial agents used as antiparasitic agents	QP51AG

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323

324 **8. Definitions and units**

325 **8.1. Definitions DDDA and DCDA**

326 The basic definitions of the units are:

- 327 • The DDDA is the assumed average dose per kg animal per species per day;
- 328 • The DCDA is the assumed average dose per kg animal per species per treatment course.

329 **8.2. Definitions of administration routes/forms for list of DDDAs and**
330 **DCDAs**

- 331 • Parenteral (P) = injectables and long-acting injectables;
- 332 • Oral (O) = bolus, tablet, oral powder, oral paste, oral solution and premix;
- 333 • Intramammary dry cow (IM-DC);
- 334 • Intramammary lactating cow (IM-LC);
- 335 • Intrauterine devices (IUD).

336 **8.3. DDDA and DCDA units**

337 The units used for DDDAs and DCDAs will be

- 338 • Oral and injectable products = mg/kg animal;
- 339 • Intramammary products lactating cow = Units (UD)/teat (dairy cow);
- 340 • Intramammary products dry cow = Units (UD)/udder (dairy cow);
- 341 • Intrauterine devices = Units (UD)/animal.

342

343 9. General principles

344 The DDDAs and DCDAs will usually be assigned according to the declared strength (content) given in
345 the label/name or SPC of the product.

346 Various salts of a substance will usually be assigned the same DDDA and DCDA. Exceptions will be
347 explained in the list of DDDAs and DCDAs.

348 DDDAs will usually be assigned by species and kg animal. Exceptions are intramammary products and
349 intrauterine devices.

350 The assignment of DDDAs and DCDAs will usually be based on the average (arithmetic mean) of all
351 observations of veterinary medicinal products for each species, substance and administration
352 route/form in question given by the SPCs.

353

$$\text{Average} = (a_1 + a_2 + a_3 \dots + a_n) / n$$

354

355 For each observation of long-acting injectables the dose per day for the substance and species will be
356 calculated by dividing the (single) dose by the number of days of duration of the therapeutic effect of
357 the substance. The same approach will be applied for substances for oral use that are long-acting due
358 to their long biological half-life.

359 Review of a DDDA or DCDA should be considered if the dosing changes substantially from the one
360 identified, in e.g. the Summary of Product Characteristics (SPC) of a substance, pharmaceutical form
361 and/or species. As changes of DDDAs or DCDAs can have major implications for long-term studies on
362 consumption of veterinary medicinal products these should be kept to a minimum.

363 The principles will be used to assign new DDDAs or DCDAs and when existing DDDAs or DCDAs need to
364 be revised.

365 9.1. Assignment of DDDAs

366 9.1.1. Single substance products – oral products and injectables

367 Oral and injectable products will be assigned separate DDDAs.

368 Oral products

369 For each combination of species and substance for oral VMPs containing a single substance, the DDDAs
370 will usually be assigned based on the average dose (arithmetic mean) of the daily doses given in the
371 SPCs per species and substance – e.g. pigs/colistin/oral products and cattle/flumequine/oral products.
372 Exceptions to these rules will be given in the list of DDDAs.

373 Injectables

374 Injectables and long-acting injectables will usually be given the same DDDA for each combination of
375 species and substance and will be based on the average dose (arithmetic mean) of all observations of
376 injectables and long-acting injectables on daily dose given for each combination of species and
377 substance – e.g. cattle/oxytetracycline/injectables. Exceptions will be described in the list of DDDAs.

378 Separate DDDAs will be assigned for injectable prodrugs and their active substance - e.g. for procaine
379 benzylpenicillin and benzylpenicillin.

380 **9.1.2. Combinations - oral and injectable products**

381 Substances in combination products (2nd and 3rd ingredient) will be assigned the same DDDA as
382 assigned for the single substance product for the same administration route (oral products and
383 injectables) and species. Exceptions will be described in the list of DDDAs (e.g. synergistic
384 combinations).

385 **9.1.3. Intramammary products**

386 **9.1.3.1. Intramammary – lactating cow**

387 The DDDA for VMPs used to treat lactating cows will be assigned as the number of intramammary
388 injectors per teat per day.

389 **9.1.3.2. Intramammary – dry cow**

390 For VMPs used in the dry cow period no DDDAs will be assigned (see 9.2.3.2.).

391 **9.1.4. Intrauterine devices**

392 The DDDA will be assigned as the number of intrauterine devices per animal per day.

393 **9.2. Assignment of DCDA**

394 **9.2.1. Single substance products - oral products and injectables**

395 **Oral products**

396 For each combination of species and substance for oral products containing a single substance, the
397 DCDA will be assigned based on the average of course doses given by the SPCs (dose multiplied with
398 number of treatment days for each observation). Exceptions to these principles will be explained in the
399 list of DCDA (e.g. premixes for pigs).

400 **Injectables**

401 Injectables and long-acting injectables will be assigned the same DCDA - e.g.
402 pigs/oxytetracycline/injectable. Exceptions to these rules will be explained in the list of DCDA.
403 Injectable prodrugs will be given separate DCDA – e.g. procaine benzylpenicillin and benzylpenicillin.

404 **9.2.2. Combinations – oral products and injectables**

405 **Oral products**

406 Substances in oral combination products will usually be assigned the same DCDA as the one assigned
407 for the single substance product. Exceptions will be explained in the list of DCDA (e.g. synergistic
408 combinations).

409 **Injectables**

410 Substances in injectable combination products will be assigned the same DCDA as the substance in
411 single substance products. This principle will also apply for injectable prodrugs. Exceptions will be
412 explained in the list of DCDA (e.g. synergistic combinations).

413 **9.2.3. Intramammary products**

414 **9.2.3.1. Intramammary – lactating cow**

415 The DCDA for lactating cows will be assigned as the number of intramammary injectors (UD) per teat
416 per treatment course.

417 **9.2.3.2. Intramammary – dry cow**

418 DCDA will be assigned as 1 DCDA = 4 intramammary injectors (4 UD).

419 **9.2.4. Intrauterine devices**

420 DCDA will be assigned as numbers of units (UD) per animal per treatment course.

421

422

423 **Appendix 1**

424 This appendix provides general considerations and impact analyses supporting the suggested principles
425 for assignment of DDDAs and DCDAs. First, the data that produce the basis for the impact analyses
426 and considerations are described.

427 **1. Assignment of preliminary DDDAs and DCDAs**

428 **1.1. Collection and analysis of data on dosing**

429 With the aim to assist the development of the general principles for the assignment of DDDA and
430 DCDAs as well as for their actual assignment, data sourced from SPCs on dosing (daily dose and
431 number of days of treatment) of antimicrobial VMPs were provided by nine volunteer EU countries in
432 2014: Czech Republic, Denmark, Finland, France, Germany, the Netherlands, Spain, Sweden and
433 United Kingdom. These countries cover approximately 65% of the food-producing animals of the EU
434 MSs.

435 A template was developed to collect the SPC information on dosing (SPC template). The main reasons
436 for using a template for collection of dosing information were to ensure that all data required for
437 assignment of DDDAs and DCDAs were provided for all products marketed for broilers, cattle and pigs
438 and to obtain standardized data for the purpose of further quality check and analysis of the data. The
439 ESVAC sales template¹ was used as a basis for the development of the SPC template. The final SPC
440 template included the following administration routes/forms: bolus/tablets, injection, injection long-
441 acting, intramammary products, intrauterine devices, oral paste, oral powder, oral solution and
442 premix.

443 In human medicine a DDD is usually established according to the declared content (strength) of the
444 product (WHO, 2015b). Various salts of a substance are usually not given different DDDs. Exceptions
445 are described in the guidelines for the different ATC groups. For example, the DDDs for anti-malarias
446 are expressed as the base. This uniformity principle is applicable for veterinary medicine as well and
447 therefore data on dosing were provided according to the declared strength/label of the VMP.

448 Prior to the call for data the SPC template was tested by four countries (France, the Netherlands,
449 Sweden and Switzerland) and training on how to fill in the template was provided for the nine
450 volunteer MSs.

451 The national ESVAC sales register was used to prepare country specific SPC templates.

452 Based on the experience from testing of the template and the feedback from the training, instructions
453 on how to fill in the template in a harmonised/standardized manner were developed assisted by the ad
454 hoc working group on technical units of measurement (see Appendix 2).

455 **1.2. Quality check, validation and management of the data**

456 Each national data set was initially subjected to quality check, including identification of missing
457 information and whether the data were harmonised and standardized across the nine MSs. The
458 individual data sets were further validated in terms of identification of extreme values. In case of

¹ Available from
http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/document_listing/document_listing_000302.jsp&mid=WC0b01ac0580153a00&jsearched=true

459 missing information, extreme values or non-compliance in terms of harmonization and standardization,
 460 the MS in question was asked to revise the data.

461 In cases where a country provided dosing information for different pack sizes of the same antimicrobial
 462 VMP (name, strength and form) only one pack size was included in the final data set for the country in
 463 question.

464 After aggregating the data sets from the nine MSs, the data were further validated in terms of
 465 identification of outliers for dosing or treatment duration by use of R (R open source software version
 466 3.1.0; R foundation for Statistical Computing, Vienna, Austria). Outliers (extreme values) were defined
 467 as values greater/smaller than the average dose (or duration) ± 2 Standard Deviation (SD). For
 468 observations identified as outliers, the SPC information for the particular VMP was used to revise the
 469 data; if values were correct, the outliers were excluded from the data (93 observations were outlier for
 470 dose; 89 observations were outlier for treatment duration; 18 observations were outlier for both).

471 **1.3. Numbers of observations - species, administration routes/forms and**
 472 **antimicrobial agents for assignment of preliminary DDDAs and DCDAs**

473 Following the quality check, validation of the data and exclusion of outliers the data sets from the nine
 474 countries consisted of a total of 2,887 observations: for single substance VMPs the data sets from the
 475 volunteer MSs consisted of 2,199 observations for antimicrobial, species and administration
 476 route/forms for which the data were collected and for combination VMPs of 688 observations for
 477 antimicrobials (almost solely 2nd ingredient), species and administration route/form (Table 3, Table 4).
 478 These data were applied to assign the preliminary DDDAs and DCDAs.

479 **Table 3.** Number of observations per species per administration route/form for single substance
 480 products in the data sets from 9 MSs

Species	Bolus/ tablet	Injection	Injection long-acting	Oral paste	Oral powder	Oral solution	Premix	Total
Broilers					102	257	49	408
Cattle	18	329	83	1	54	95	15	595
Pigs	3	419	82	3	189	292	208	1,197
Total	21	748	165	4	345	644	272	2,199

481 **Table 4.** Number of observations per species per administration route/form for combination products
 482 in the data sets from nine MSs
 483

Species	Bolus/ tablet	Injection	Oral paste	Oral powder	Oral solution	Premix	Total
Broilers				14	43	19	76
Cattle	12	125		23	17	14	191
Pigs		195	2	61	85	78	421
Total	12	320	2	98	145	111	688

484 **1.4. Calculation of preliminary DDDA and DCDA**

485 An example of dosing information given for two different amoxicillin oral solution VMPs is shown in
 486 Table 5. When the dosing was given as a range for an observation – i.e. for one VMP (antimicrobial,
 487 species and administration route) - the “fixed” daily dose and “fixed” number of treatment days was
 488 calculated for each observation as the mean of the range.

489 **Table 5.** Example of dosing information provided by the nine MSs for two observations: amoxicillin
 490 VMPs (oral solution) and pigs

Range daily dose given		Fixed daily dose given	Daily dose	Range number of treatment days given		Fixed number of treatment days given	Number of treatment days	Course dose
Daily dose mg/kg min	Daily dose mg/kg max	Daily dose mg/kg	Daily dose mg/kg	Treatment days min	Treatment days max	Treatment days	Treatment days	Course dose mg/kg
10	20		15*			5	5	75**
		20	20	3	5		4*	80**

491 *Daily dose/number treatment days calculated by ESVAC; **Course dose calculated by ESVAC

492 When daily dose was given as e.g. 200 g Premix X/1,000 kg feed or 200 g Oral solution Y/1,000 l
 493 water, the daily dose per kg animal for each observation was calculated by use of a standardized feed
 494 and water intake per kg body weight, respectively (Appendix 3). When the daily dosing was given in
 495 IU/kg, the dose was calculated to provide the dose in mg/kg by use of the conversion factors applied
 496 for the ESVAC sales data (EMA/ESVAC, 2014).

497 The course dose for each observation was calculated by multiplying the daily dose by the number of
 498 treatment days (Table 5).

499 For long-acting injectables the daily dose for each observation was calculated as shown in the following
 500 example:

- 501 • 20 mg/kg oxytetracycline injection with a duration of effect of 2 days = daily dose 10 mg/kg.

502 In human medicine, the DDDs are calculated as average of the daily doses given for the substance and
 503 administration route in question.

504 For the DDDA the average (arithmetic mean) of all observations for each unique combination of
 505 species, antimicrobial substance and administration route/form included in the data sets – e.g.
 506 pig/colistin/oral forms was calculated by use of the following formula:

$$\text{Average} = (a_1 + a_2 + a_3 \dots + a_n) / n$$

509 The same approach was applied for the calculation of DCDA (average of all observations on course
 510 dose).

511

512 **2. Definition of DDDA and DCDA**

513 In human medicine DDDs are assigned by the WHO International Working Group for Drug Statistics
514 Methodology and the unit is defined as follows: "The DDD is the assumed average maintenance dose
515 per day for a drug used for its main indication in adults" (WHO, 2015b). The DDDs are assigned for a
516 person of 70 kg.

517 For many antimicrobial VMPs, in particular old products, the information given in the SPC on the
518 indication might be very general – e.g. "to treat bacterial infections". In the instructions on how to fill
519 in the SPC data (Appendix 2) it reads that if the main indication is clear, dosing should always be
520 entered for this. The MSs providing SPC information on dosing were not requested to indicate if it was
521 given for the main indication therefore the number of observations for which the dosing was given for
522 the main indication is not known. It can only be assumed that the dosing is given for the main
523 indication when available, and that the assigned preliminary DDDAs and DCDA to a certain extent
524 reflect the dosing for the main indication.

525 The instructions for filling the SPC information in the predesigned template guided the recording of
526 information for various difficult cases such as when a different dose is given for preventive and
527 therapeutic use or for young versus adult animals (Appendix 2).

528 Since data on consumption of antimicrobials in animals will typically be collected and reported by
529 various weight group (e.g. finisher pigs) the DDDAs and DCDA will be assigned by kg animal allowing
530 for further calculations of numbers of DDDA and DCDA consumed by weight group.

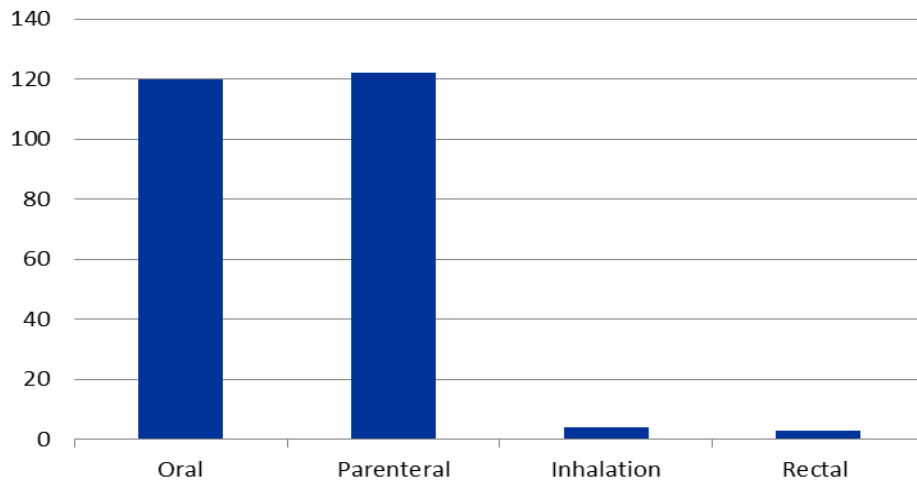
531 DDDA and DCDA will generally be assigned by kg animals based on the following definitions:

- 532 • The DDDA is the assumed average dose per kg animal per species per day;
- 533 • The DCDA is the assumed average dose per kg animal per species per treatment.

534 **3. Administration routes/forms and combination VMPs**

535 In human medicine, DDDs are assigned for four administration routes/forms (Figure 1) and the
536 number of DDDs assigned for single substance products is 249. In addition DDDs have been assigned
537 for 20 combination products.

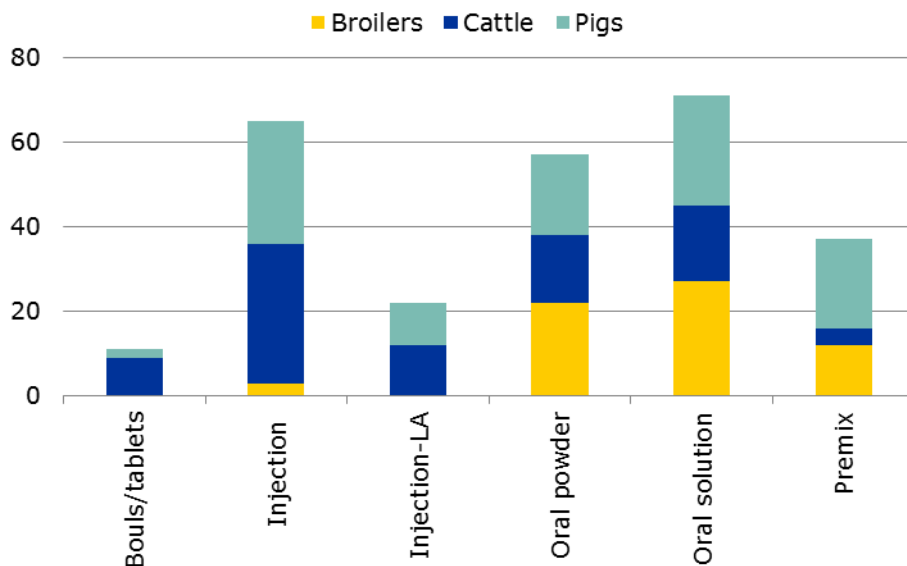
538 **Figure 1.** Numbers of DDDs assigned for single substance **human** medicinal products containing
 539 antimicrobial agents



540

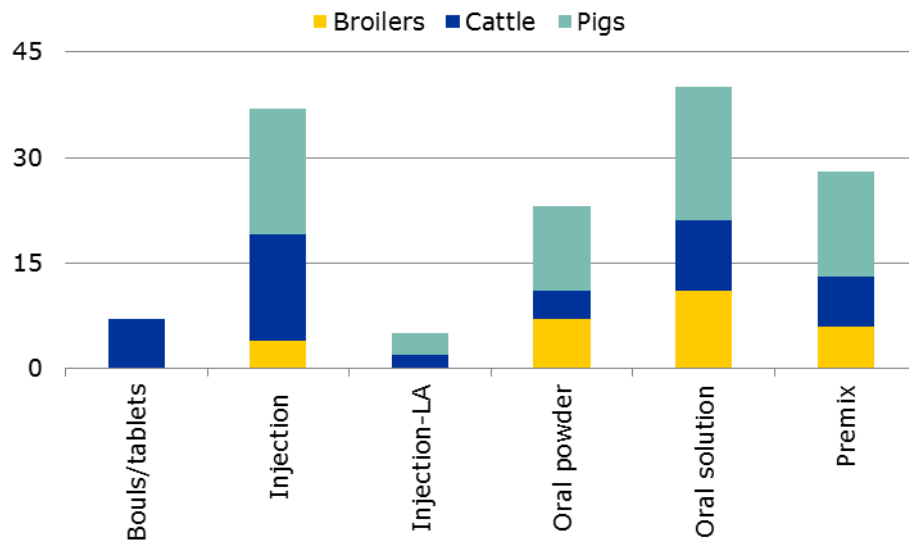
541 In order to have detailed data available for impact analyses, SPC information on dosing for
 542 antimicrobial VMPs was collected for the following administration routes/forms: bolus, tablets,
 543 injection, injection long-acting, intramammary products, intrauterine devices, oral paste, oral powder,
 544 oral solution and premix. If DDDAs and DCDAs were to be assigned separately for each of these
 545 administration routes/forms for single substance VMPs for broilers, cattle and pigs, estimations based
 546 on the data on dosing obtained from the nine MSs show that the total number would be approximately
 547 530 (Figure 2). Assignment of DDDAs and DCDAs for substances in combination VMPs would add to the
 548 number by 272 (Figure 3).

549 **Figure 2.** Numbers of DDDAs to be assigned for single substance products of antimicrobial agents for
 550 **veterinary** medicinal products (N =265), estimated from data provided by nine EU MSs. *Note that the*
 551 *numbers are preliminary.*



552

553 **Figure 3.** Numbers of DDDAs to be assigned for substances in combination VMPs of antimicrobial
 554 agents for **veterinary** medicinal products (N =136), estimated from data provided by nine EU MSs.
 555 *Note that the numbers are preliminary.*



556
 557 In total, more than 800 DDDAs and DCDAs would have to be assigned if they are assigned by species
 558 and separately for each oral form, injectables and long-acting injectables and for single substance
 559 VMPs as well as for combination VMPs. In addition, DDDAs and DCDAs for intramammary products and
 560 intrauterine devices would still add to that number.

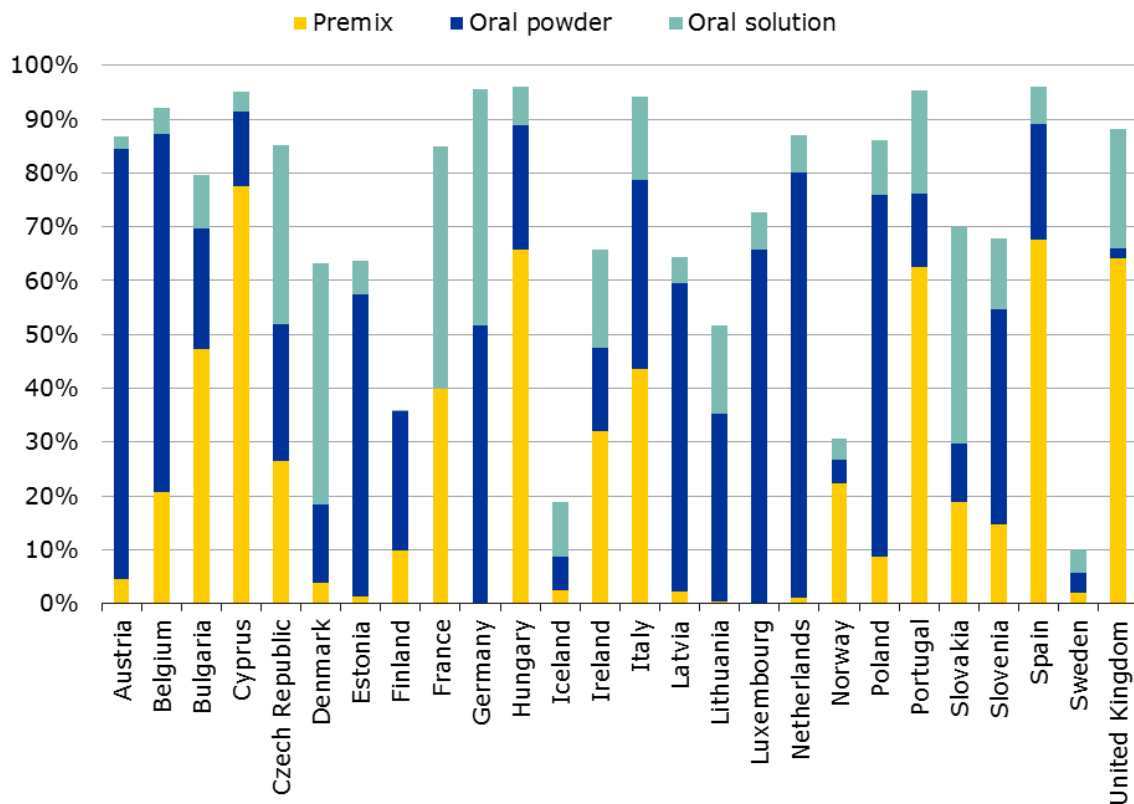
561 In order to make the list of DDDAs and DCDAs manageable for analyses and reporting of data the
 562 impact of e.g. assigning the same DDDA and DCDA for each unique combination of antimicrobial,
 563 species and oral forms was assessed.

564 **3.1. Administration routes/forms**

565 **3.1.1. Oral forms**

566 The proportion of sales, in mg per population correction unit (mg/PCU), accounted for by the main oral
 567 forms (oral powder, oral solution and premix) varies substantially between the 26 EU/EEA countries
 568 that provided data for ESVAC in 2012 (Figure 4).

569 **Figure 4.** Premixes, oral powders and oral solutions, as percentages of total sales, in mg/PCU, of
 570 veterinary antimicrobial agents for food-producing animals (including horses), by country, for 2012
 571 (EMA/ESVAC, 2014)



572

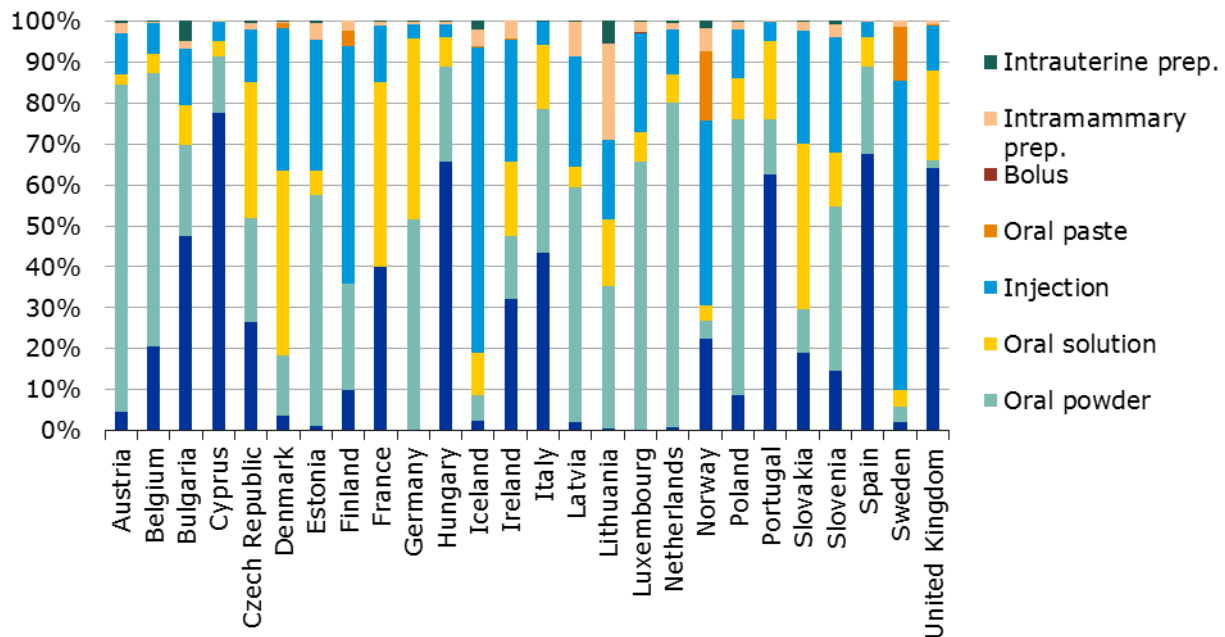
573 If the daily dose and number of treatment days varies substantially between these forms, this could
 574 have an impact on the reported output in terms of numbers of DDDAs and DCDA's.

575 3.1.2. Injectables

576 In human medicine assignment of the same DDD for oral and parenteral forms of antibiotics is
 577 common, since parenteral formulations are often only used initially in the treatment course. In the
 578 current Guidelines for ATC classification and DDD assignment 2014 (WHO, 2015b) in human medicine,
 579 it reads (page 24): *"The DDD is often identical for various dosage forms of the same drug. Different*
 580 *DDDs may be established when the bioavailability is substantially different for various routes of*
 581 *administration (e.g. oral and parenteral administration of morphine) or if the dosage forms are used*
 582 *for different indications. When the use of parenteral formulations represents only a minor fraction of*
 583 *the total use for a specific indication, these products do not receive a separate DDD even if the*
 584 *bioavailability of the oral form is substantially different."*

585 In veterinary medicine, the proportion of antimicrobial agents sold as injectable antimicrobial VMPs in
 586 some countries in the EU/EEA area is high, in particular in the Nordic countries (Figure 5), and
 587 injections are frequently used as the only administration route for treatment of the food producing
 588 animals.

589 **Figure 5.** Distribution of sales of veterinary antimicrobial agents for food-producing animals (including
 590 horses), in mg/PCU, by pharmaceutical form, by country, for 2012



591
 592 Of the sales of injectable antimicrobial agents for food-producing animals in 26 EU/EEA countries in
 593 2012, the most sold substances (in weight of active substance) were benzylpenicillin (as prodrugs),
 594 dihydrostreptomycin (almost solely in combination VMPs), amoxicillin, oxytetracycline and florfenicol.
 595 Preliminary data show that the DDDAs for e.g. injectable amoxicillin and oxytetracycline are about 2
 596 and 4 times higher than for the oral forms, respectively. **Therefore, it is suggested to assign**
 597 **DDDAs and DCDA separately for injectables and oral forms.**

598 **3.1.2.1. Long-acting injectables**

599 In human medicine the only long-acting substances for injectables specified as such are some
 600 sulfonamides and a macrolide (azithromycin) which indicates that the number of long-acting
 601 antimicrobials in human medicine is low (WHO, 2015b).

602 In veterinary medicine, the consumption of long-acting injectable VMPs is much higher than in human
 603 medicine and some substances have a much longer biological half-life than the sulfonamides previously
 604 mentioned. Therefore it should be assessed whether DDDA and DCDA should be assigned separately
 605 for long-acting injectables.

606 **3.1.2.2. Injectables - prodrugs**

607 In human medicine, DDDs are always linked to the ATC code and prodrugs are usually assigned a
 608 separate ATC code and DDD if the doses used are different and/or the non-proprietary name of the
 609 prodrug and the active drugs are different. Depot formulations (e.g. sustained release formulations)
 610 are usually assigned the same DDDs as the ordinary dosage forms.

611 In the EU/EEA area injectable benzylpenicillin prodrugs account for the major proportion of sales
 612 expressed as benzylpenicillin and is almost solely accounted for by procaine benzylpenicillin (ESVAC,
 613 unpublished data). **It is therefore suggested to assign separate DDDAs and DCDA for**
 614 **injectable prodrugs.**

615 **3.1.3. Intramammary products and intrauterine devices**

616 Most of the intramammary VMPs sold in the EU/EEA are combination products. In the human ATC/DDD
617 system DDDs for e.g. vaginal creams containing more than one active ingredient are given in UD.
618 That means that for vaginal creams (applied with a dose applicator) 1 application equals 1 UD (WHO,
619 2015b).

620 A similar approach is suggested for intramammary VMPs and intrauterine devices.

621 The suggested units for reporting of e.g. intramammary products are:

- 622 • Intramammary products lactating cow = Units (UD)/teat (dairy cow);
- 623 • Intramammary products dry cow = Units (UD)/udder (dairy cow);

624 The suggested indicator to report consumption of intramammary products is:

- 625 • Number of injectors of the VMP/1,000 dairy cows/year.

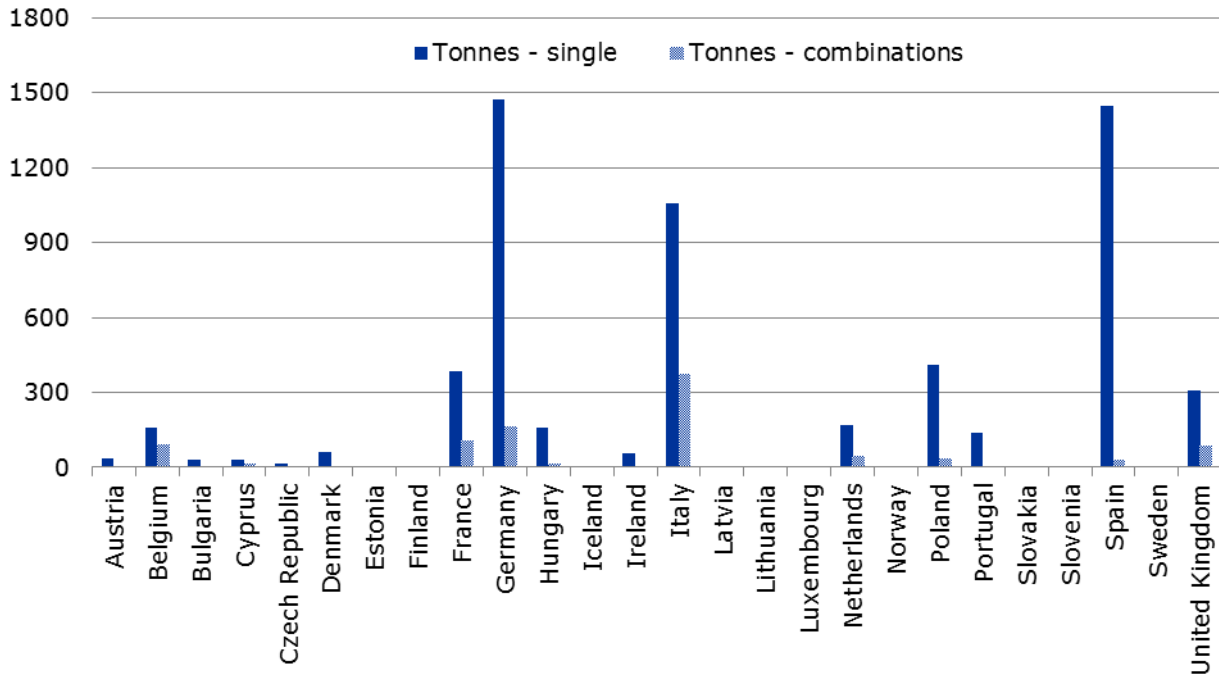
626 **3.2. Combination VMPs – oral and injectable products**

627 In human medicine the DDDs assigned for combination products are based on the main principle of
628 counting the combination as one daily dose (main indication), regardless of the number of active
629 ingredients included in the combination: *"If a treatment schedule for a patient includes e.g. two single*
630 *ingredient products, then the consumption will be measured by counting the DDDs of each single*
631 *ingredient product separately"* (WHO, 2015b).

632 In the EU/EEA countries the type/number of combination antimicrobial products in human medicine is
633 negligible compared to veterinary medicine and consists mainly of sulfonamide-trimethoprim
634 combinations and antibiotics combined with an enzyme inhibitor.

635 The sales of antimicrobial VMP combinations applicable for group treatment (oral powder, oral solution
636 and premix) were shown to represent 14.2% of the sales of these pharmaceutical forms in 26 EU/EEA
637 countries in 2012 (EMA/ESVAC, 2014) (Figure 6). Of these, a large proportion consists of combinations
638 that in principle could be regarded as treatment with two different antimicrobial VMPs.

639 **Figure 6.** Sales, in tonnes of active ingredient, of premixes, oral powders and oral solutions as single
 640 and combination antimicrobial VMPs in 26 EU/EEA countries in 2012



641

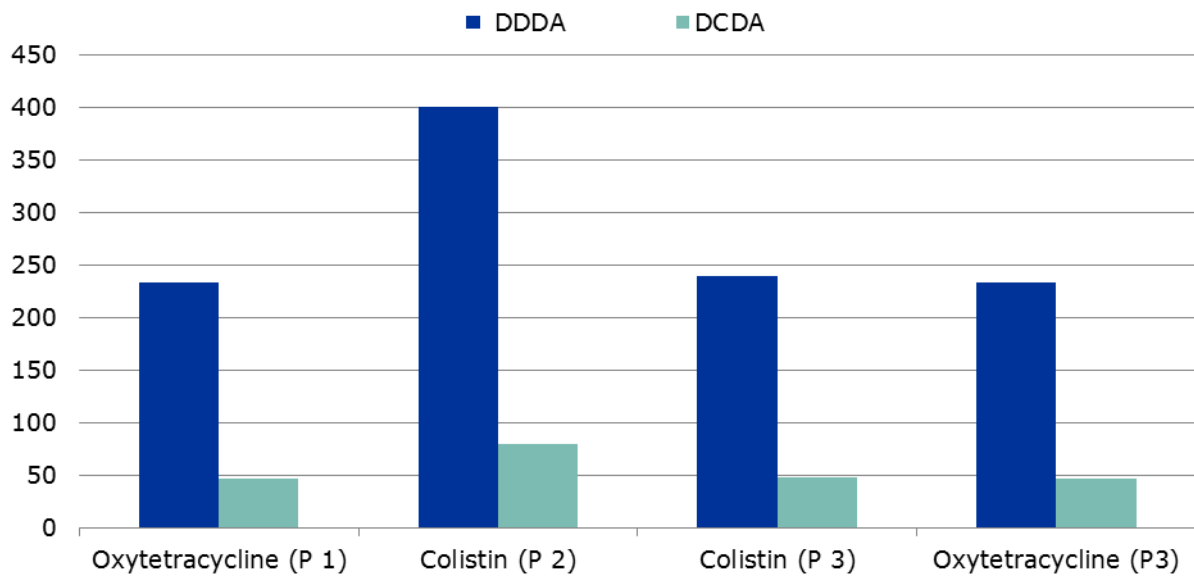
642 In particular for the analyses of data on prevalence of antimicrobial resistance by species together with
 643 data on consumption in the same species, it is important to assess the consumption of each substance
 644 in a combination VMP.

645 An example on output, in numbers of DDDAs calculated by use of invented figures of consumption of
 646 colistin and oxytetracycline in single and combination VMPs as oral powders (real products) is shown in
 647 Table 6 and Figure 7.

648 **Table 6.** Calculated numbers of DDDAs (thousands) and DCDA (thousands) per kg pig of three
 649 different products consumed in pigs

	Substance	Pack size	Strength	No. sold	DDDA (1000)	DCDA (1000)
Prod 1	Oxytetracycline	1,000 g	70 mg/g	100	233	47
Prod 2	Colistin	1,000 g	20 mg/g	100	400	80
Prod 3	Colistin	1,000 g	12 mg/g	100	240	48
	Oxytetracycline	1,000 g	70 mg/g	100	233	47

650 **Figure 7.** Calculated numbers of DDDAs and DCDA (thousands) per kg pig of three different products
651 authorised for use in pigs (data from Table 6)



652

653 In case the 2nd ingredient for product 3 (oxytetracycline) is not included in the analyses only half of
654 the consumption (selection pressure) of oxytetracycline would have been identified. Note that the
655 same DDDA and DCDA have been used for single and combination VMP in this analysis.

656 **It is suggested to assign and report DDDA and DCDA also for the 2nd (and 3rd) ingredient**
657 **for combination VMPs.**

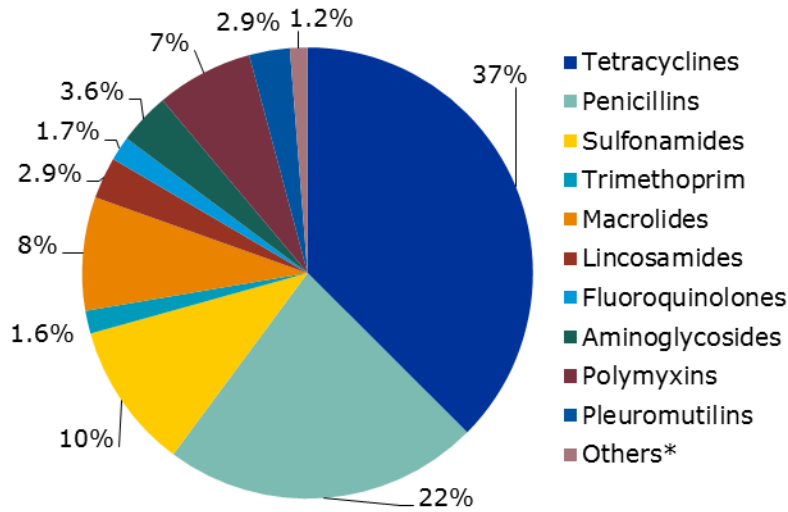
658 4. Impact analyses and other assessments

659 In order to make the list DDDAs and DCDA manageable for the analyses and reporting of data on
660 consumption by animal species – i.e. to limit the numbers to be assigned - various impact and other
661 assessments were performed. The impact analyses address the major administration forms – i.e. oral
662 and injectable products, including:

- 663 1. Whether the same DDDA could be assigned for each antimicrobial and species for all oral forms
664 and injectables, respectively;
- 665 2. Whether the DDDAs assigned for single antimicrobial VMPs could be applied for the same
666 antimicrobial, species and oral forms and injectables, respectively, in combinations products;
- 667 3. Whether the same DCDA could be assigned for each antimicrobial and species for all oral forms
668 and injectables, respectively;
- 669 4. Whether the DCDA assigned for single antimicrobial products could be applied for same
670 antimicrobial, species and oral forms and injectables, respectively, in combinations products.

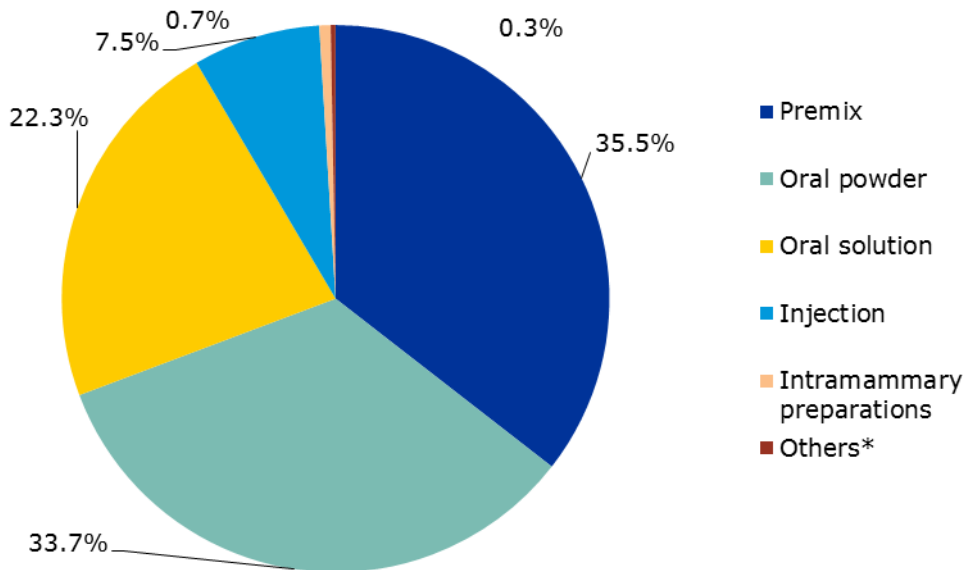
671 Sales data for 2012 in 26 EU/EEA countries were used as a basis for selecting the antimicrobials for the
672 impact analyses (Figure 8). Since the oral forms account for the major proportion of the sales (Figure
673 9), these forms as well as injectables were addressed for the impact analyses.

674 **Figure 8.** Sales of antimicrobial agents by antimicrobial class as percentage of the total sales for
 675 food-producing species (including horses), in mg/PCU, aggregated by 26 countries, for 2012



676
677

678 **Figure 9.** Distribution of sales, in mg/PCU, of the various pharmaceutical forms of veterinary
 679 antimicrobial agents for food-producing animals (including horses) aggregated by 26 EU/EEA countries
 680 for 2012



681
682 * Oral paste, bolus and intrauterine products.

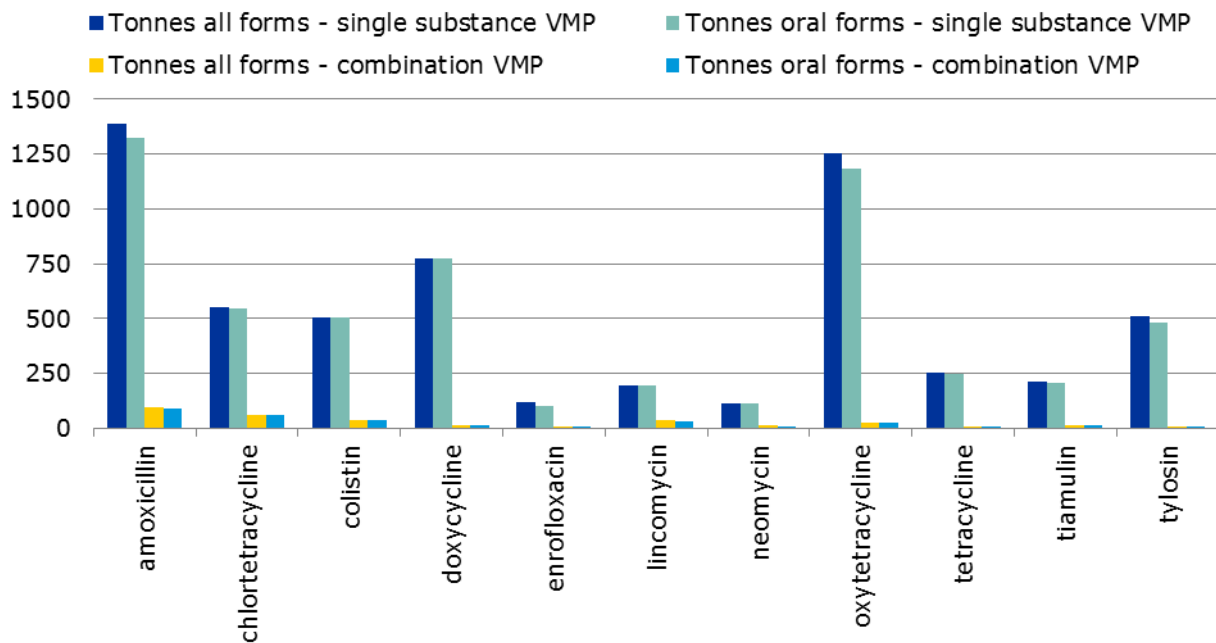
683 **4.1. DDDAs - single substance products**

684 **4.1.1. Oral forms**

685 In a study by Postma et al. (2015) on assigning DDDAs by use of SPC data from four EU MSs, oral
 686 forms were aggregated; it was however suggested to consider assigning a separate DDDA for oral
 687 solution and for oral powder and premix. An impact analysis was performed by ESVAC to identify the

688 influence of assigning DDDAs separately for oral solutions compared to applying the same DDDAs for
 689 all oral forms.

690 **Figure 10.** Total sales (tonnes) of the most-selling single antimicrobial VMPs (sales of more than 100
 691 tonnes) for all pharmaceutical forms and for all oral forms; total sales of the same substances as
 692 combination VMPs of all pharmaceutical forms and for oral forms in 26 EU/EEA countries in 2012



693

694 Amoxicillin and oxytetracycline were selected for the analyses as these substances were the overall
 695 most-selling antimicrobial agents, in tonnes, in the 26 countries providing data to ESVAC for 2012
 696 (Figure 10). The tonnes sold of oral powder, oral solution and premix of amoxicillin and oxytetracycline
 697 in 26 EU/EEA countries in 2012 as well as in two specifically chosen MSs as provided to ESVAC 2012
 698 were used for the impact analyses. The complete amount was considered as sold for one animal
 699 species (pigs). The aim of analysing “DDDA average oral powder and premix/DDDA oral solution” was
 700 to identify the impact of assessing consumption of oral solution separately from the other oral forms.

701 **Explanation of the labels of the axis shown in Figure 11, Figure 12, Figure 13, and Figure 14**

- 702 • **DDDA by oral form** = (tonnes oral powder sold substance X/DDDA oral powder) + (tonnes oral
 703 solution sold substance X/DDDA oral solution) + (tonnes premix sold substance X/DDDA premix)
- 704 • **DDDA average oral powder and premix/DDDA oral solution** = (tonnes oral powder + premix
 705 sold of substance X)/(average DDDA of oral powder + premix) + (tonnes oral solution sold of
 706 substance X/DDDA oral solution)
- 707 • **DDDA average oral forms** = (tonnes oral powder + oral solution + premix sold of substance X)
 708 /(average DDDA of all oral forms).

709 **4.1.1.1. Amoxicillin**

710 Preliminary DDDAs for single substance VMPs of amoxicillin for pigs for oral solution, oral powder and
 711 premix shown in Table 7 were used for the various impact analyses.

712 **Table 7.** Preliminary DDDAs (mg/kg) for amoxicillin single substance VMPs for pigs for the major oral
 713 forms and DDDA average of oral powder and premix)

	Oral powder	Oral solution	Premix	Average oral powder and premix	Average all oral forms
Pigs	20	16	16	18	17

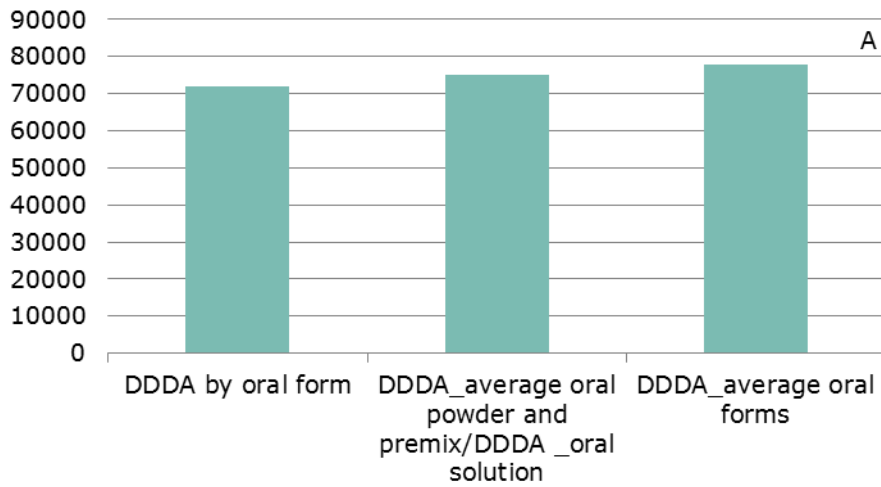
714 **Annual outputs**

715 The preliminary DDDAs and sales data shown in Table 7 and Table 8, respectively, were applied for the
 716 impact analyses on annual output.

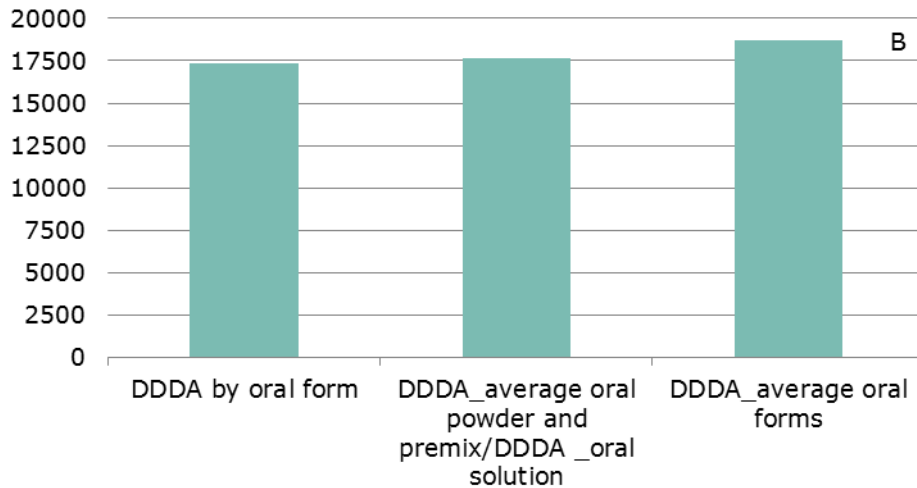
717 **Table 8.** Sales (tonnes) of amoxicillin in single substance VMPs oral solution, oral powder and premix
 718 in 26 EU/EEA countries (A) and two different MSs (B and C). It was assumed that all sales
 719 were used for pigs

	Oral powder	Oral solution	Premix
A. Sales 26 EU/EEA countries	863	265	194
B. Sales MS 1	198	<0.5	120
C. Sales MS 2	333	153	<0.5

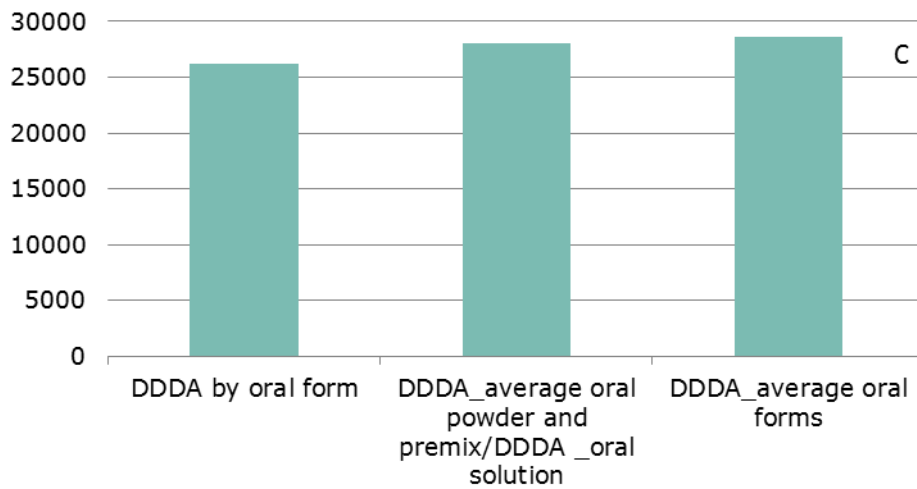
720 **Figure 11.** Calculated numbers of DDDAs (millions) sold of single amoxicillin VMPs as oral powder, oral
 721 solution and premix in 26 EU/EEA countries (A) and two different MSs (B and C) in 2012 assuming that
 722 the total amounts sold were used for pigs



723



724



725

726 The numbers of DDDAs amoxicillin calculated by application of DDDA for each oral form was 5%, 2%
 727 and 7% lower for A, B and C, respectively, compared to the output when oral solution was calculated
 728 separately (Figure 11).

729 The numbers of DDDAs calculated by application of DDDA for each oral form was 8%, 7% and 9%
 730 lower for A, B and C, respectively, compared to the output when average DDDAs were applied.

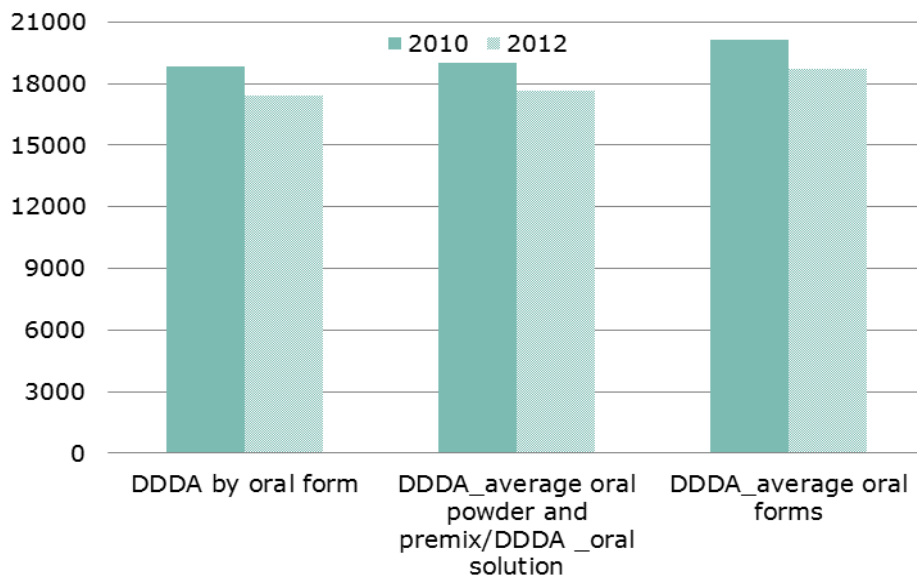
731 **Changes across time**

732 In order to assess the impact of applying DDDA as average of oral forms compared to applying DDDAs
 733 by the various oral forms on identifying changes in consumption across time, sales data for amoxicillin
 734 single substance VMPs from one MS for 2010 and 2012 were applied (Table 9).

735 **Table 9.** Sales (tonnes) of amoxicillin in single substance VMPs oral solution, oral powder and premix
 736 in 2010 and 2012 in one MS

	Oral powder	Oral solution	Premix
2010	207	<0.5	135
2012	198	<0.5	120

737 **Figure 12.** Calculated numbers of DDDAs (millions) sold of single amoxicillin VMPs as oral powder, oral
 738 solution and premix. Sales data for one EU MS in 2010 and 2012 were applied for the calculation and it
 739 was assumed that the total amounts sold were used for pigs



740
 741 The difference in the output was small and a 7.6% reduction in consumption from 2010 to 2012 was
 742 observed when DDDAs for the three oral forms were applied to analyse sales by these forms. When
 743 using average DDDAs for these forms the estimated decline was 7.3% (Figure 12).

744 Preliminary DDDAs for single substance VMPs of oxytetracycline for pigs for oral solution, oral powder
 745 and premix shown in Table 10 were used for the impact analyses.

746 **Table 10.** Preliminary DDDAs (mg/kg) for oxytetracycline for the major oral forms for pigs

	Oral powder	Oral solution	Premix	Average oral powder and premix	Average all oral forms
Pigs	27	20	30	29	26

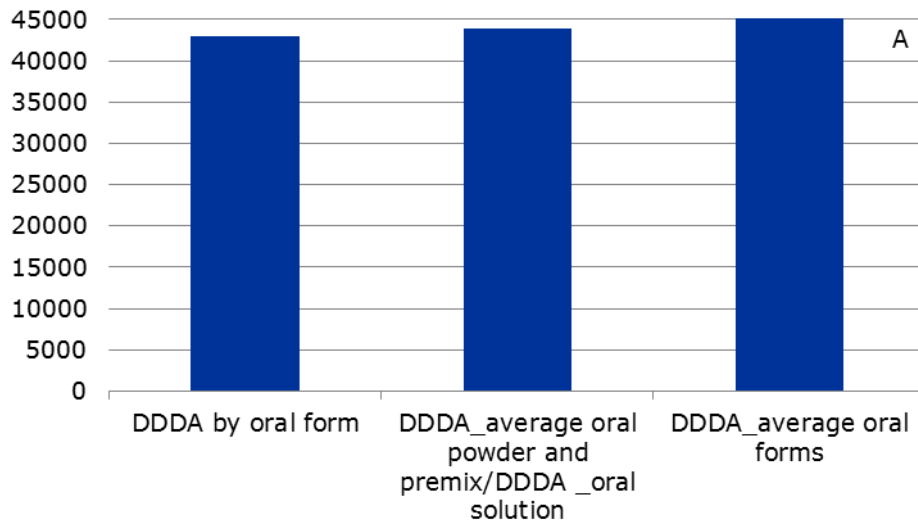
747 **Annual output**

748 The sales data shown in Table 11 were used for the impact analyses.

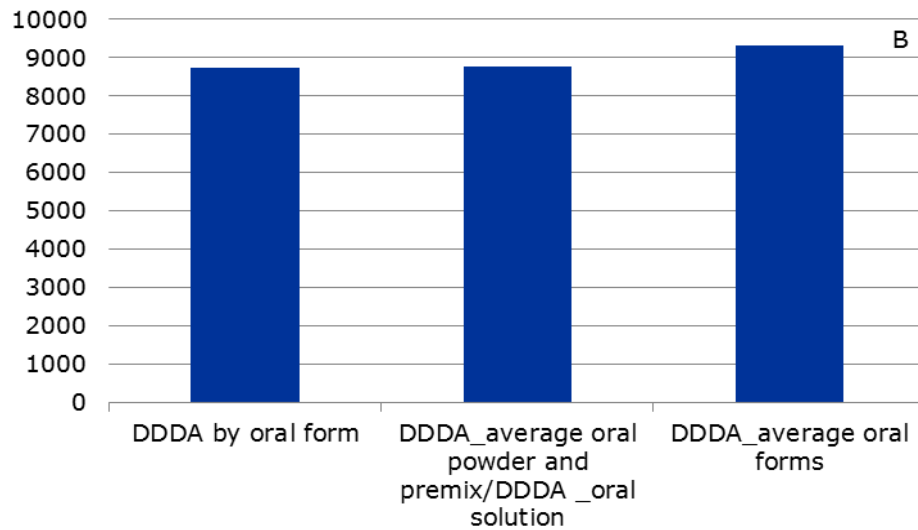
749 **Table 11.** Sales (tonnes) of oxytetracycline in single substance VMPs oral solution, oral powder and
 750 premix in 26 EU/EEA countries (A) and two different MSs (B and C). It was assumed that all
 751 sales were for use in pigs

	Oral powder	Oral solution	Premix
A. Sales 26 EU/EEA countries	227	161	797
B. Sales MS 1	97	19	127
C. Sales MS 2	11	0	0

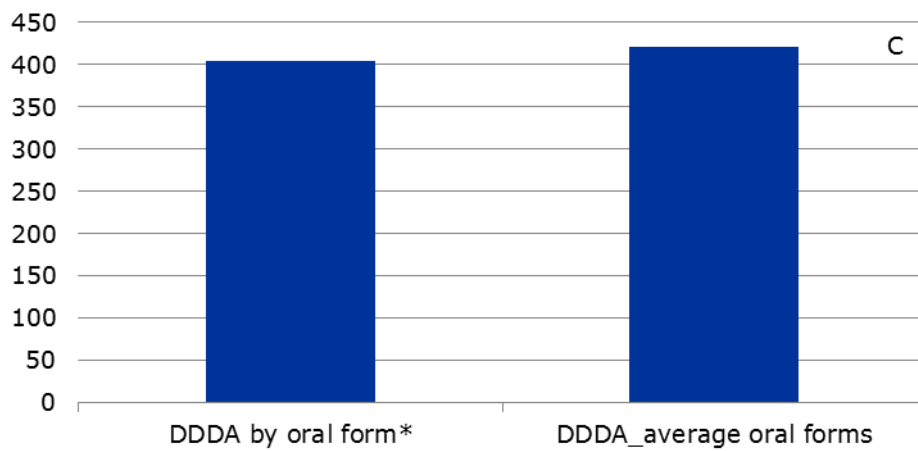
752 **Figure 13.** Calculated numbers of DDDAs (millions) sold of single oxytetracycline VMPs as oral
 753 powder, oral solution and premix in 26 EU/EEA countries (A) and two different MSs (B and C) in
 754 assuming that the total amounts sold were used in pigs



755



756



757

758 *Represent sales of oral powder (see Table 11)

759 The numbers of DDDAs oxytetracycline calculated by application of DDDA for each oral form was 2%
 760 and 0.4% lower for A and B, respectively, compared to the output when oral solution was calculated
 761 separately (Figure 13). The numbers of DDDAs calculated by using DDDA for each oral form was 6%,
 762 7% and 4% lower for A, B and C, respectively, compared to the output when average DDDAs were
 763 applied.

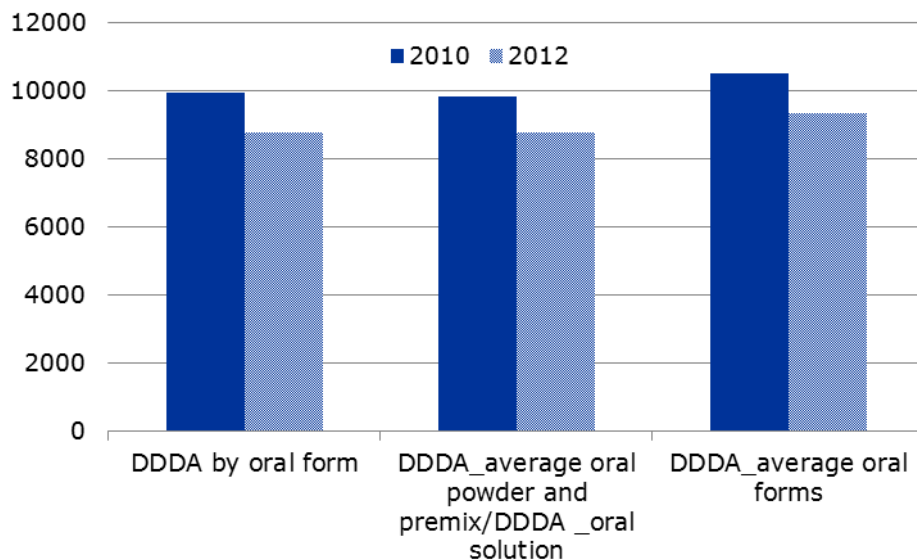
764 **Changes across time**

765 In order to assess the impact of using DDDA as average for all oral forms compared to applying DDDAs
 766 for each form and to identify changes in consumption across time sales data for oxytetracycline single
 767 substance VMPs from one MS for 2010 and 2012 were used (Table 12).

768 **Table 12.** Sales (tonnes) of oxytetracycline in single substance VMPs of oral solution, oral powder and
 769 premix in 2010 and 2012 in one MS

	Oral powder	Oral solution	Premix
2010	158	33	198
2012	97	19	127

770 **Figure 14.** Calculated numbers of DDDAs (millions) sold of single oxytetracycline VMPs as oral powder,
 771 oral solution and premix. Sales data for one specific EU MS in 2010 and 2012 were used for the
 772 calculation and it was assumed that the total amounts sold were used for pigs



773
 774 The difference in the output was small as a 12.1% reduction in sales from 2010 to 2012 was observed
 775 when specific DDDAs for the three oral forms were applied to analyse sales; when the average DDDAs
 776 of these forms were applied the estimated reduction was 11.3% (Figure 14). The results indicate that
 777 applying the DDDA as average of all oral forms for pigs for amoxicillin and oxytetracycline,
 778 respectively, had a relatively minor impact on the output compared to when the form-specific DDDAs
 779 were used. This is also the case when oral solutions are analysed separately.

780 Applying the average DDDA oral forms for the estimation on changes across years had almost no
 781 impact compared to when the "form"-specific DDDAs were used to analyse sales of oral powder, oral
 782 solution and premix.

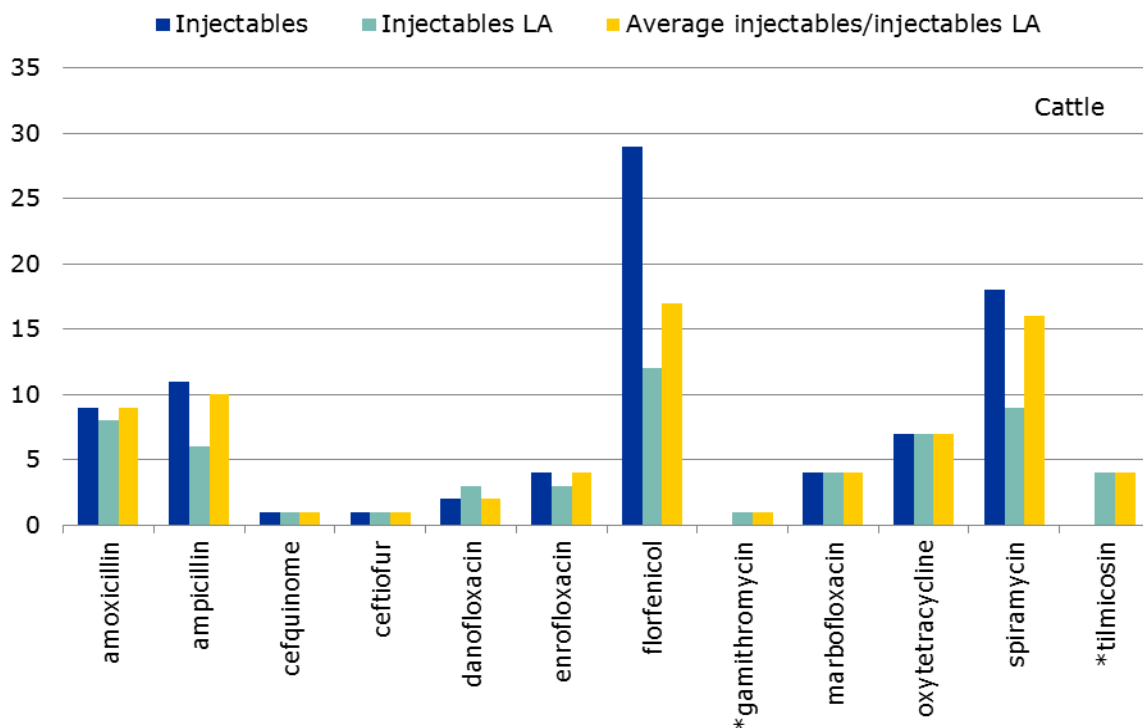
783 **It is suggested to assign the single DDDA for the same substance in a combination VMP.**

784 **4.1.2. Injectables**

785 The data sets provided by the nine MSs comprise information on dosing for injectables and for
 786 long-acting injectables by antimicrobial and species. For the collection of data on dosing from the nine
 787 MSs (Chapter 1) injectables were defined as long-acting when the duration of activity is above
 788 24 hours. An antimicrobial VMP may be long-acting either because of its long biological half-life, its
 789 formulation or sometimes because of both – e.g. procaine-penicillin can be “short-acting” because of
 790 an intermediate half-life (<24 hours) and long-acting because of the formulation. The substances
 791 identified with long biological half-life are gamithromycin, tilmicosin and tulathromycin (macrolides).

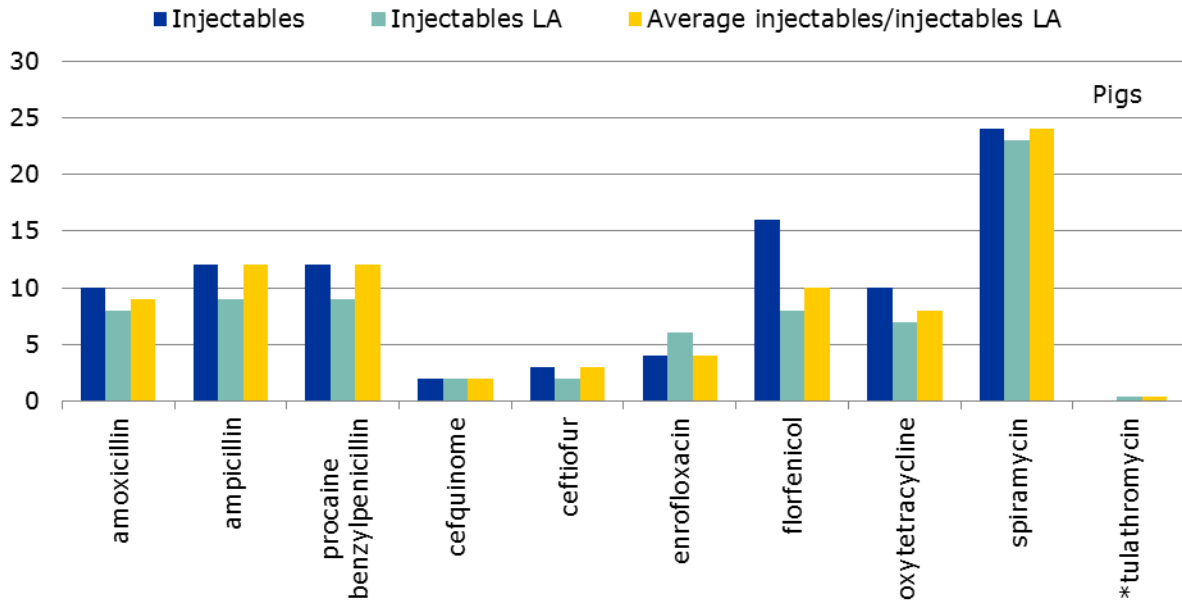
792 The data sets provided by the nine MSs consisted of 15 substances for which the single substance
 793 injectable VMPs were given as long-acting; 12 for cattle and 10 for pigs (Figure 15, Figure 16).

794 **Figure 15.** Preliminary DDDAs (mg/kg) for injectables, long-acting injectables and average DDDA of
 795 these for cattle



796
 797 * Long-acting only
 798

799 **Figure 16.** Preliminary DDDAs (mg/kg) for injectables, long-acting injectables and average DDDA of
 800 these for pigs



801

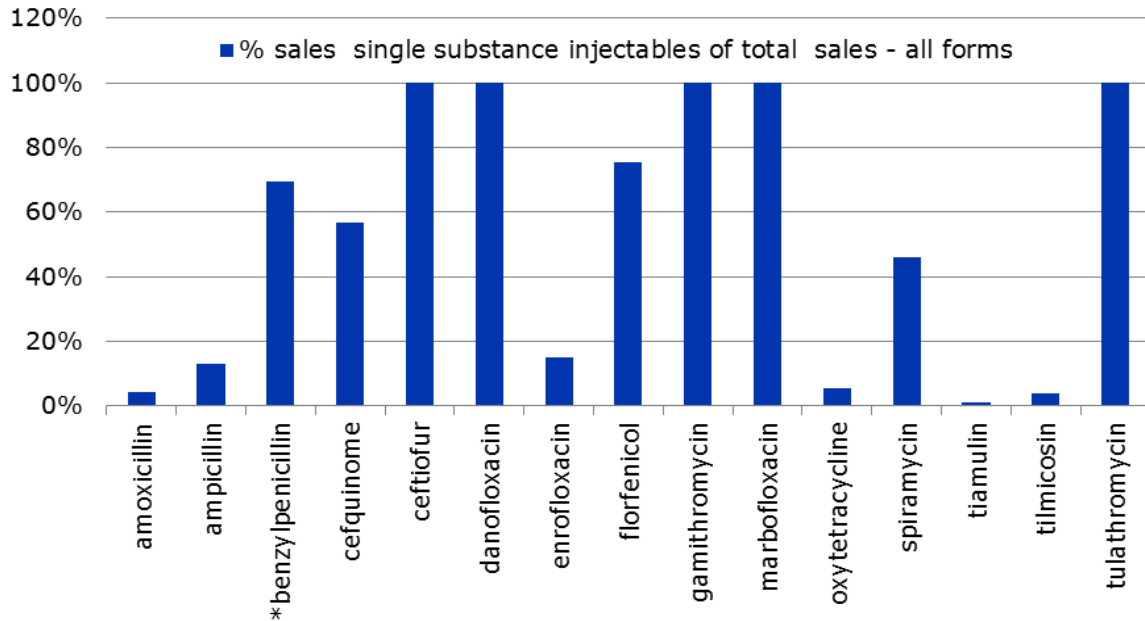
802 * Long-acting only

803 The ESVAC sales data of injectables are not stratified into injectables and long-acting injectables. As it
 804 would be very time-consuming to stratify sales into injectables and long-acting injectables by use of
 805 the "raw" sales data provided at product level for the 26 EU/EEA countries, similar impact analyses as
 806 for oral forms have not been completed.

807

808 Figure 17 shows the percentage sales as injectables of total sales for those antimicrobials that are
 809 specified as long-acting injectables in the data sets provided by the nine MSs.

810 **Figure 17.** Percentage sales (in tonnes active substance) of injectables and long-acting injectables
 811 single substance VMPs of total sales (all forms), for those substances that were specified as long-acting
 812 in the data sets from the nine MSs



813

814 *Major part sold as procaine benzylpenicillin

815 For the most-selling injectable substances – amoxicillin and oxytetracycline - minor differences are
 816 observed between the preliminary DDDAs (mg/kg) for injectables and long-acting injectables. This is
 817 also the case for the CIAs with highest priority for human medicine. Notable differences are seen
 818 between the preliminary DDDAs for injectables and long-acting injectables for ampicillin, florfenicol and
 819 spiramycin. For ampicillin the proportion sold as injectable in general is low and thus assigning the
 820 same DDDA for injectables and long-acting injectables is suggested to have a minor impact on the
 821 output. It should be noted that for spiramycin, only one of five observations for the DDDA was for
 822 long-acting injectables.

823 Sales of florfenicol as injectable VMP accounts for close to 75% of all sales of this substance in the 26
 824 EU/EEA countries in 2012; it could therefore be considered to assign separate DDDAs for injectable and
 825 long-acting injectables of florfenicol.

826 **It is suggested to assign the same DDDA for substances in injectable and long-acting**
 827 **injectable VMPs. Prodrugs and its active substance will be assigned separate DDDAs.**
 828 **Exceptions will be identified in the lists of DDDA and DCDA.**

829 **4.2. DDDAs - combination products**

830 For fixed combinations the therapeutic effect can be improved due to a synergistic effect if one
 831 substance is influenced and enhanced by another substance (true therapeutic advantage). Fixed
 832 combinations may also be used to broaden the activity spectrum by combining more than one active
 833 substance. In such cases the benefit is that it can simplify administration of the medicinal products in

834 cases where two different antimicrobials are regarded as needed in order to obtain satisfactory
835 therapeutic effect and may facilitate owner's compliance.

836 4.2.1. Oral forms

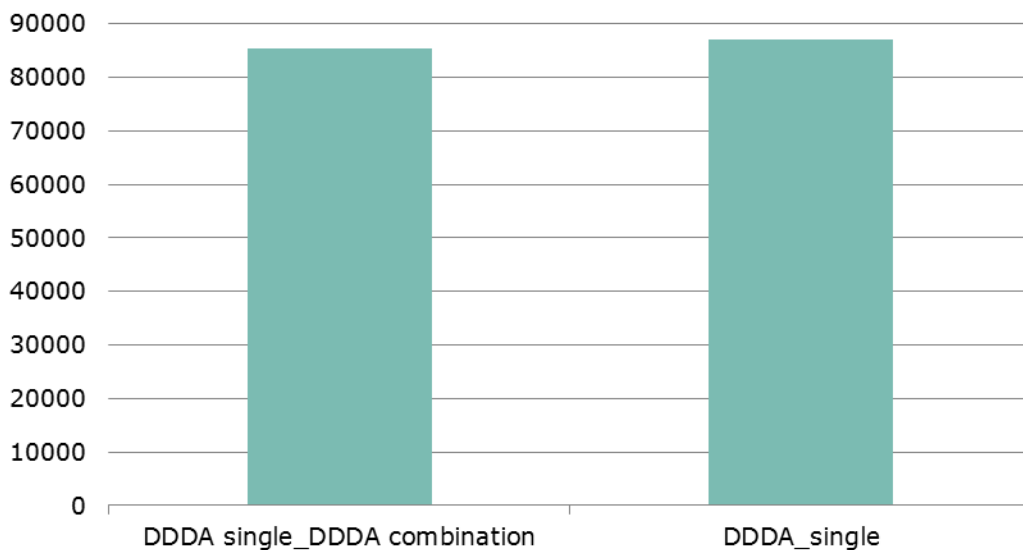
837 The preliminary DDDAs show that these may vary between single VMPs and combination VMPs. The
838 impact on the total output of applying DDDA for single substance VMPs for reporting consumption for
839 the same substance in combination VMPs were assessed by use of the preliminary DDDAS for
840 amoxicillin and oxytetracycline.

841 4.2.1.1. Amoxicillin

842 Preliminary DDDAs for pigs for amoxicillin for single and combination VMPs were applied for the impact
843 analyses - i.e. 17 mg/kg and 25 mg/kg. It should be noted that for most substances the DDDA for a
844 substance in combination VMP is typically lower than the DDDA for single substance VMP.

845 Sales of amoxicillin oral powder, oral solution and premix in 26 EU/EEA countries in 2012 as single
846 substance VMPs were 1,385 tonnes and for combination VMPs was 96 tonnes. In the analysis it was
847 assumed that all oral powder, oral solution and premix sold in the 26 EU/EEA countries were given to
848 pigs.

849 **Figure 18.** Estimated numbers of DDDA sold (millions) of amoxicillin oral powder, oral solution and
850 premix as single and combination VMP calculated by application of DDDA single and DDDA combination
851 respectively, and by application of DDDA single for the sales of both single and combination substance
852 VMPs these forms assuming that the complete amount sold was used in pigs



853

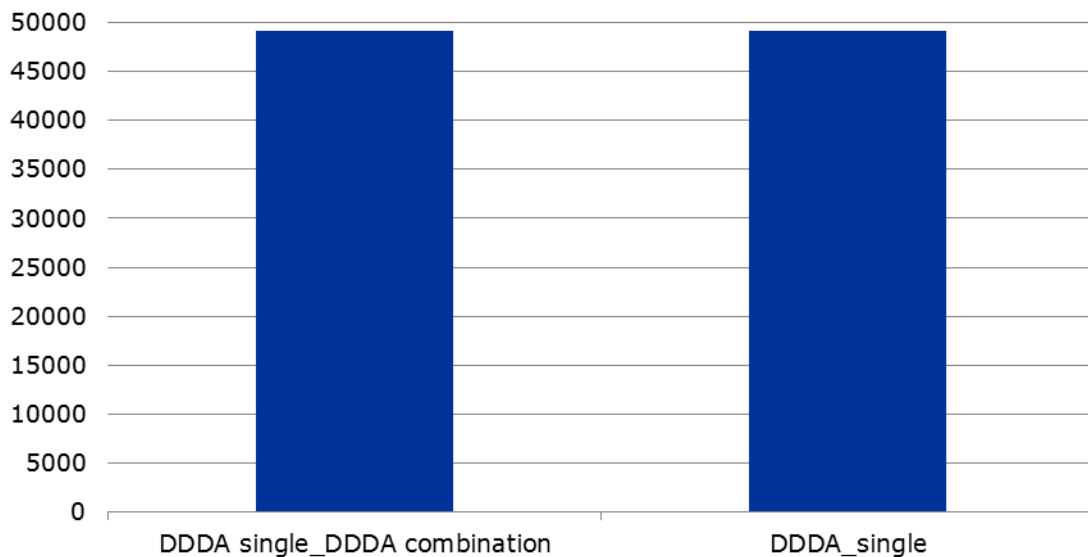
854 The difference between the estimated outputs for amoxicillin was 2% (higher) compared to when
855 applying DDDA single for sales of amoxicillin both for single and combination VMPs (Figure 18).

856 4.2.1.2. Oxytetracycline

857 Preliminary DDDAs for pigs for oxytetracycline for single and combination VMPs were applied for the
858 impact analyses - i.e. 26 mg/kg and 24 mg/kg.

859 Sales of oxytetracycline in 26 EU/EEA countries in 2012 of oral powder, oral solution and premix in
860 single substance VMPs were 1,253 tonnes and for combination VMPs it was 24 tonnes. In the analysis
861 it was assumed that all oral powder, oral solution and premix sold in the 26 EU/EEA countries were
862 given to pigs.

863 **Figure 19.** Estimated numbers of DDDA sold (millions) of oxytetracycline oral powder, oral solution
864 and premix as single and combination VMP calculated by application of DDDA single and DDDA
865 combination, respectively, and by application of DDDA single for the sales of both single and
866 combination substance VMPs these forms assuming that all sales were used in pigs



867

868 The output when applying DDDA single for oxytetracycline calculating both sales as single and
869 combination VMP was only 0.2% lower compared to analysis by use of separate DDDAs (Figure 19).

870 The results indicates that application of the same DDDA for amoxicillin and oxytetracycline for
871 analysing sales of these as combination VMPs and single substance VMP has almost no impact on the
872 output in calculated numbers of DDDAs. The explanation for this is that amount sold as combination
873 VMP is minor and the outputs were therefore not impacted by the difference between the DDDA single
874 and DDDA combination.

875 **It is suggested as a general rule to assign the single substance DDDA for the same**
876 **substance and species in a combination oral VMP. Exceptions are described in chapter 4.2.3.**

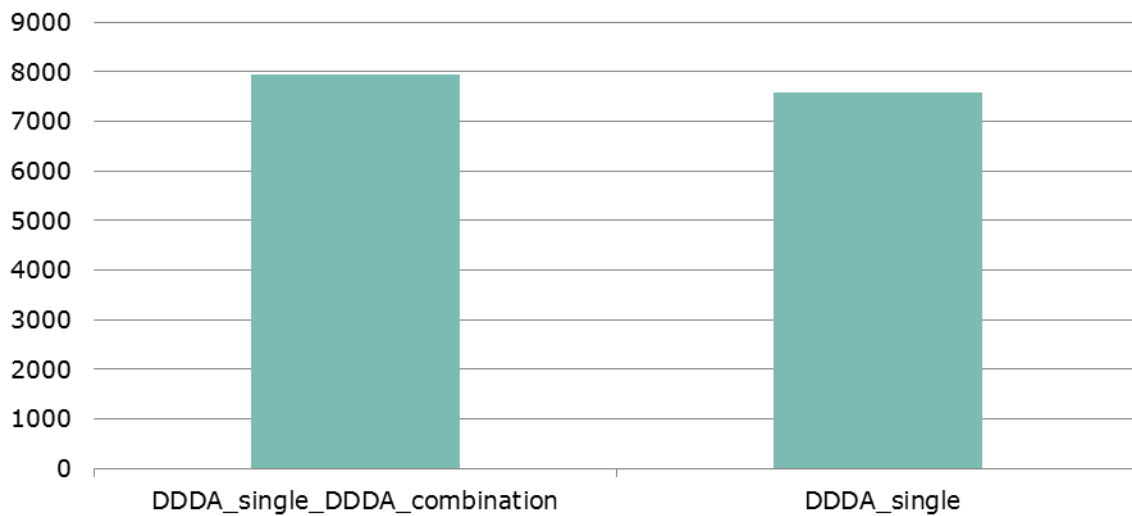
877 **4.2.2. Injectables**

878 Of the most-selling single injectable antimicrobials in the 26 EU/EEA countries in 2012 the sales of the
879 same substances in combination injectable VMPs were minor except for benzylpenicillin (ESVAC 2012,
880 unpublished data). Therefore, an impact assessment has only been completed for benzylpenicillin.

881 Benzylpenicillin is mainly sold as the prodrug procaine benzylpenicillin; 78 tonnes as single and 13
882 tonnes as combination injectable VMPs (ESVAC sales 2012, unpublished data). These data and the
883 preliminary DDDAs for the prodrug procaine benzylpenicillin as single and combination injectable VMPs
884 (12 mg/kg and 9 mg/kg, respectively) were used for the impact analysis assuming that the complete
885 sales were for pigs.

886

887 **Figure 20.** Estimated numbers of DDDA sold (millions) of procaine benzylpenicillin injectable VMPs as
888 single and combination VMP calculated either with separate DDDA for single and combination VMPS,
889 respectively or with DDDA single substance products for all sales assuming that the complete amount
890 was administered to pigs



891

892

893 If the single DDDA for procaine benzylpenicillin was used to calculate sales of both single and
894 combinations VMPs, the number of DDDAs would be 5% lower for pigs compared to when calculated by
895 specific single and combination DDDAs (Figure 20).

896 Since sales of substances in combination injectable VMPs of the most-selling single injectable VMPs in
897 the 26 EU/EEA countries in 2012 generally were very low the impact of applying single substance
898 DDDAs for injectables for the overall output is thought to be relatively low.

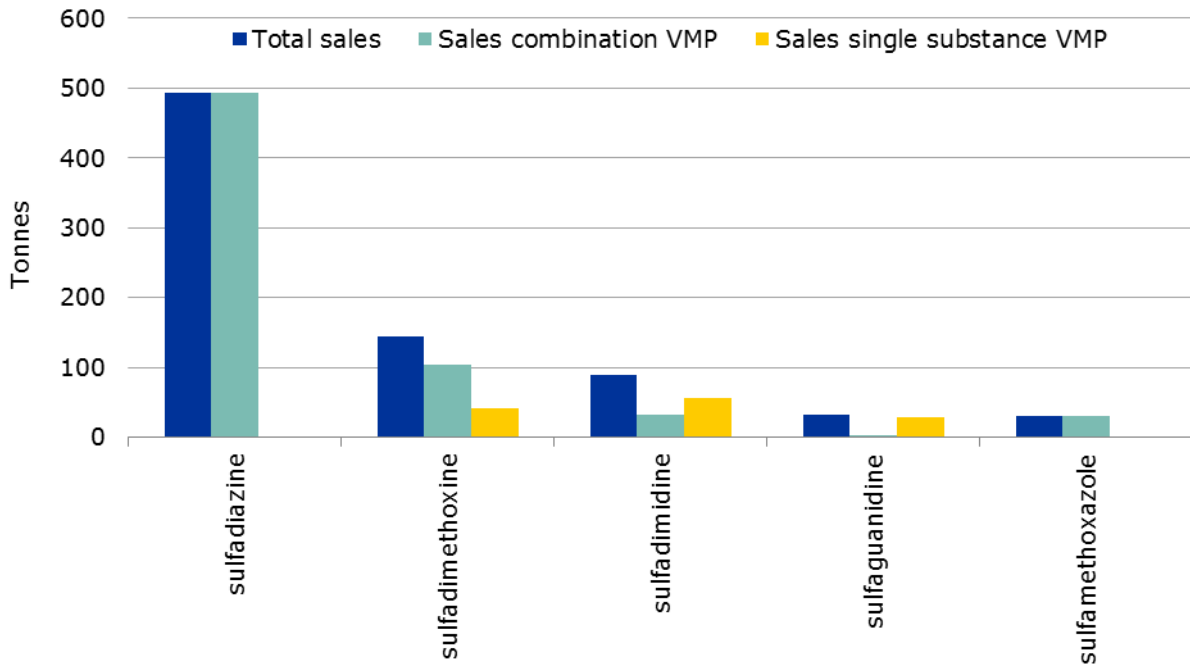
899 **It is suggested to assign the single substance DDDA oral the same substance and species in**
900 **a combination injectable VMP. Exceptions are described in chapter 4.2.3.**

901 **4.2.3. Synergistic combinations**

902 For combinations such as sulfonamide-trimethoprim the dose of the sulfonamide component is typically
903 substantially lower compared to the dose for the same sulfonamide in single substance VMPs, due to
904 the synergistic effect of this combination (White et al., 1981).

905 The major proportion of sales of sulfonamides in 26 EU/EEA countries in 2012 was for combination
906 products, of which in particular sulfadiazine but also sulfadimethoxine accounted for the major part
907 (Figure 21); these substances were almost exclusively combined with trimethoprim (ESVAC sales data
908 2012, unpublished data).

909 **Figure 21.** Sales of the most-selling sulfonamides as single substance and in combination VMPs in 26
 910 EU/EEA countries in 2012 (ESVAC 2012, unpublished data)



911

912 Preliminary DDDAs for sulfadiazine and sulfadimethoxine show that that the DDDAs are substantially
 913 lower for combination VMPs (Table 13). No sulfadiazine dosing for single substance VMPs was reported
 914 by any of the nine MSs.

915 **Table 13.** Preliminary DDDAs for sulfadiazine and sulfadimethoxine. Note that there are no data for
 916 oral powder single substance VMPs for these substances in the data sets for the nine countries

	Species	Inj.- single	Inj.- combi.	Oral powder – combi.	Oral solution -single	Oral solution combi.	Premix- single	Premix- combi.
Sulfadiazine	Cattle		15	21		42		25
Sulfadiazine	Pigs		15	23		25		22
Sulfadimethoxine	Cattle	30		17	43	17		26
Sulfadimethoxine	Pigs	30	19	17	47	26	50	26

917 **It is suggested to assign separate DDDAs for single substance sulfonamide VMP and the**
 918 **same sulfonamide in combination with trimethoprim. Exceptions will be identified in the**
 919 **lists of DDDA and DCDA.**

920

921 **4.3. DCDA – single substance products**

922 **4.3.1. Oral forms**

923 The number of treatment days is typically higher for premix compared to oral powder and oral solution
 924 and in particular for pigs; this is reflected in the preliminary DCDA as shown in Table 14, Table 15 and
 925 Table 16. The substances presented in these tables were the most selling oral single substance VMPs in
 926 26 EU/EEA countries in 2012 (Figure 10). One approach could be to assign separate DCDA for premix
 927 and for all other oral forms.

928 **Table 14.** Preliminary DCDA (mg/kg) for single substance products for **broilers** for oral powder, oral
 929 solution and premix, average DCDA all oral forms and average DCDA all oral forms when premix is
 930 excluded

	Oral powder	Oral solution	Premix	Average all oral forms	Average orals – premix excluded
Amoxicillin	78	71	150	78	73
Chlortetracycline	223	162	188	196	206
Colistin	32	21	68	25	23
Doxycycline	62	66	52	64	64
Enrofloxacin		41		41	41
Lincomycin	45	30	378	66	42
Neomycin	145	141	30	118	143
Oxytetracycline	306	298	300	303	304
Tetracycline	238	481		400	400
Tiamulin	101	75	106	88	83

931 **Table 15.** Preliminary DCDA (mg/kg) for single substance products for **cattle** for oral powder, oral
 932 solution and premix, average DCDA all oral forms and average DCDA all oral forms when premix is
 933 excluded

	Oral powder	Oral solution	Premix	Average all oral forms	Average orals – premix excluded
Amoxicillin	95			65*	65*
Chlortetracycline	110	126	194	133	113
Colistin	29	20		24	24
Doxycycline	42	43		42	42
Enrofloxacin	25	22		22	22
Neomycin	49	65	30	51	58
Oxytetracycline	112	77	145	123	104
Tetracycline	120	42	80	71	68
Tylosin	450	368		391	391

934 *Lower than oral powder because includes other oral forms as well

935 **Table 16.** Preliminary DCDA (mg/kg) for single substance products for **pigs** for oral powder, oral
 936 solution and premix, average DCDA all oral forms and average DCDA all oral forms when premix is
 937 excluded

	Oral powder	Oral solution	Premix	Average all oral forms
Amoxicillin	83	70	171	105
Chlortetracycline	200	96	230	210
Colistin	29	23	47	30
Doxycycline	47	51	83	57
Enrofloxacin		10		10
Lincomycin	52	92	134	87
Neomycin	64	83	131	92
Oxytetracycline	112	80	266	173
Tetracycline	214	207	340	221
Tiamulin	74	57	83	70
Tylosin	155	140	98	131

938 An impact analysis was performed in order to compare numbers of DCDA when oral powder, oral
 939 solution and premix are analysed separately by use of specific DCDA, when the average DCDA for all
 940 orals were used and when premixes were analysed separately by its specific DCDA.

941 **Explanation of the axis shown in Figure 22 and Figure 23**

- 942 • **DCDA by oral form** = (tonnes oral powder sold substance X/DCDA oral powder) + (tonnes oral
 943 solution sold substance X/DCDA oral solution) + (tonnes premix sold substance X/DCDA premix)
- 944 • **DCDA average all oral forms** = (tonnes oral powder + oral solution + premix sold of substance
 945 X)/(average DCDA of all oral forms)
- 946 • **DCDA average oral forms (premix excluded)/DCDA premix** = (tonnes oral powder + oral
 947 solution sold of substance X)/(average DCDA of all oral forms-premix excluded) + (tonnes premix
 948 sold of substance X/DCDA premix)

949 **4.3.1.1. Amoxicillin**

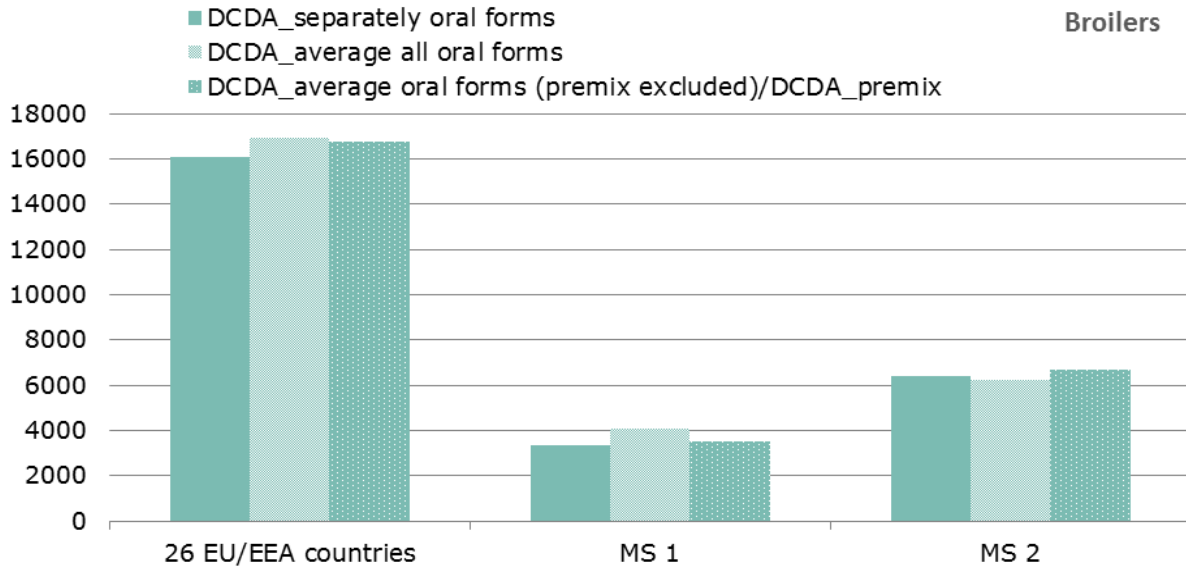
950 Preliminary DCDA for amoxicillin used for the impact analyses are shown in Table 14 and Table 16.
 951 The tonnes sold of oral powder, oral solution and premix of amoxicillin and oxytetracycline in
 952 26 EU/EEA countries in 2012 as well as in two MSs as provided to ESVAC 2012 were used for the
 953 impact analyses (Table 17). The complete amount was considered as sold for use either for broilers
 954 and pigs, respectively

955 **Table 17.** Sales (tonnes) of amoxicillin in single substance VMPs oral solution, oral powder and premix
 956 in 2012 in 26 EU/EEA countries and two different MSs

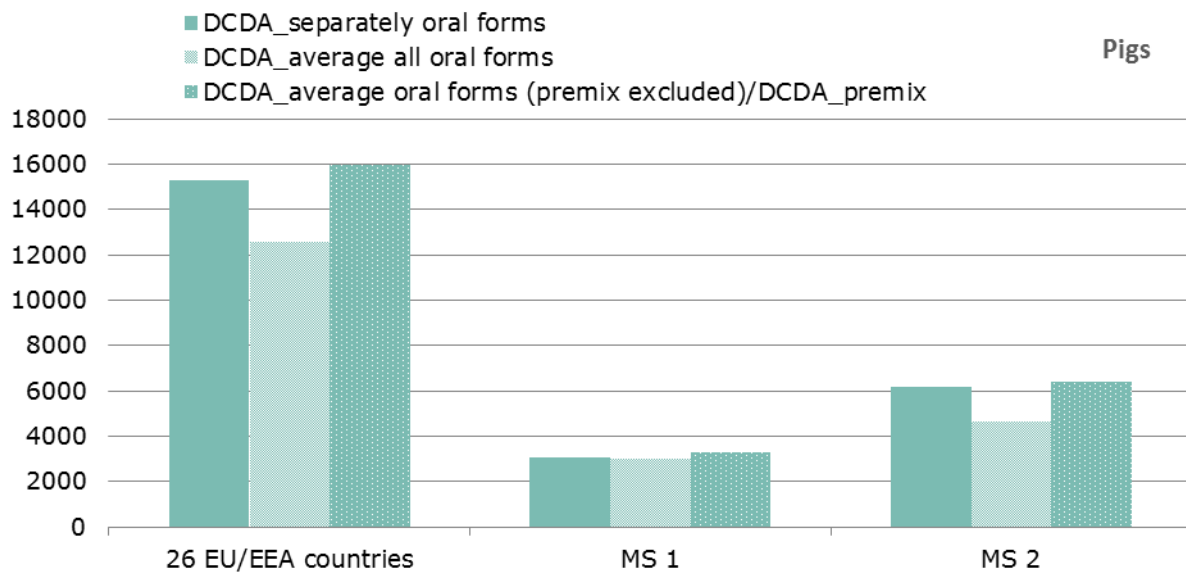
	Oral powder	Oral solution	Premix
Sales 26 EU/EEA countries	863	265	194
Sales MS 1	198	<0.5	120
Sales MS 2	333	153	<0.5

957

958 **Figure 22.** Numbers of DCDA (millions) of single amoxicillin VMPs calculated by use of 1) separate
 959 DDDAs oral powder, oral solution and premix, 2) average DDDA orals and 3) average DCDA orals
 960 (premix excluded) for oral powder add oral solution and DCDA premix for premix. Sales data for
 961 26 EU/EEA countries and two specific MSs in 2012 were applied for the calculation and it was assumed
 962 that the complete amounts sold were used in either broilers or pigs



963
 964
 965



966

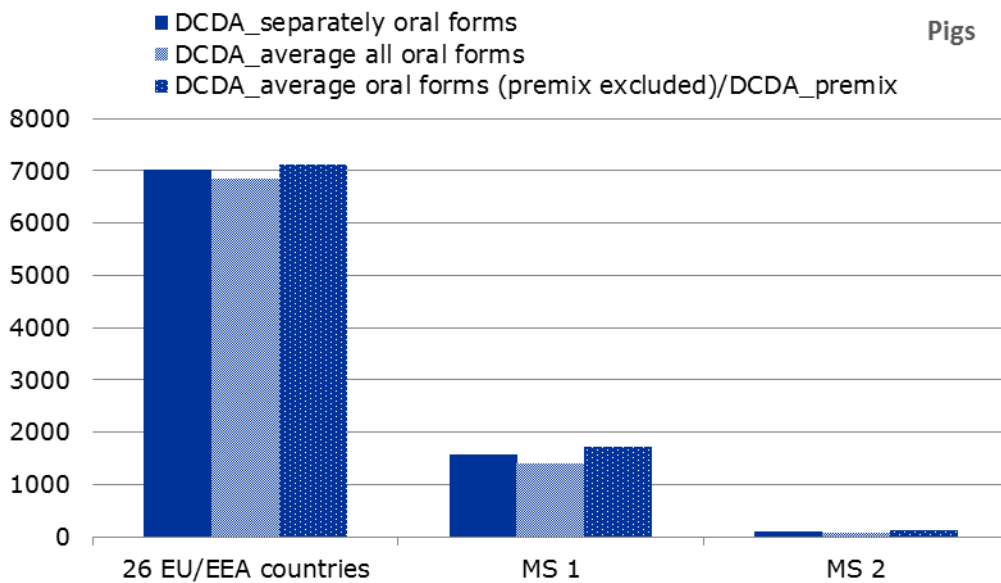
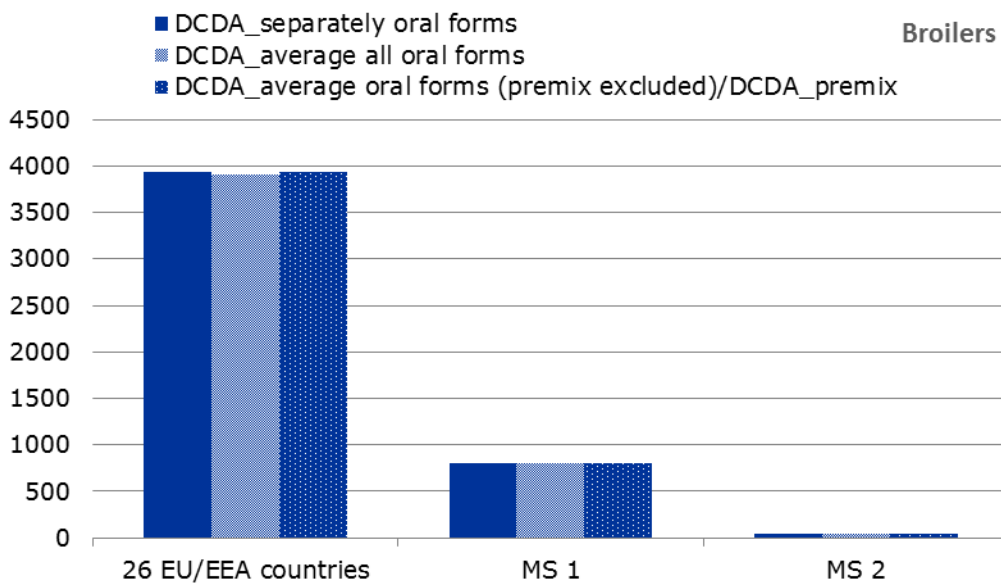
967 **4.3.1.2. Oxytetracycline**

968 Preliminary DCDA for oxytetracycline applied for the impact analyses shown in Table 14 and Table 16,
 969 and the sales data for amoxicillin oral powder, oral solution and premix shown in Table 18 were used
 970 for the impact analyses assuming that the complete amounts were used either for broilers or pigs.

971 **Table 18.** Sales (tonnes) of oxytetracycline in single substance VMPs oral solution, oral powder and
 972 premix in 2012 in 26 EU/EEA countries and two different MSs

	Oral powder	Oral solution	Premix
Sales 26 EU/EEA countries	227	161	797
Sales MS 1	97	19	127
Sales MS 2	11	0	0

973
 974 **Figure 23.** Numbers of DCDA (millions) of single oxytetracycline VMPs calculated by use of 1)
 975 separate DDDAs oral powder, oral solution and premix, 2) average DDDA orals and 3) average DCDA
 976 orals (premix excluded) for oral powder and oral solution and DCDA premix for premix. Sales data for
 977 26 EU/EEA countries and two different MSs in 2012 were applied for the calculation and it was
 978 assumed that the total amounts sold were used for either broilers or pigs



981

982 **Broilers**

983 For broilers the change in output when using separate DCDA for premix and for all other oral VMPs for
984 the analysis compared to when the DCDA average of all observations of oral forms was used, was
985 minor both for amoxicillin (4%–5%) and oxytetracycline (0.1%–1%) (Figure 22, Figure 23).

986 **Pigs**

987 For pigs the change in output when using separate DCDA for premix and for all other oral VMPs for the
988 analysis compared to when the DCDA average of all observation of oral forms was used for amoxicillin
989 is 27% for the 26 EU/EEA countries, 38% for MS 2 and for MS 1 it is 9%. For oxytetracycline the
990 corresponding figures were 4%, 22% and 84% (Figure 22, Figure 23).

991 The results of the analyses show that the impact on the output when using separate DCDA for premix
992 and DCDA for all other oral VMPs versus the DCDA average of all observations of oral forms is
993 influenced by the distribution of sales as oral powder, oral solution and premix - overall and by MS.

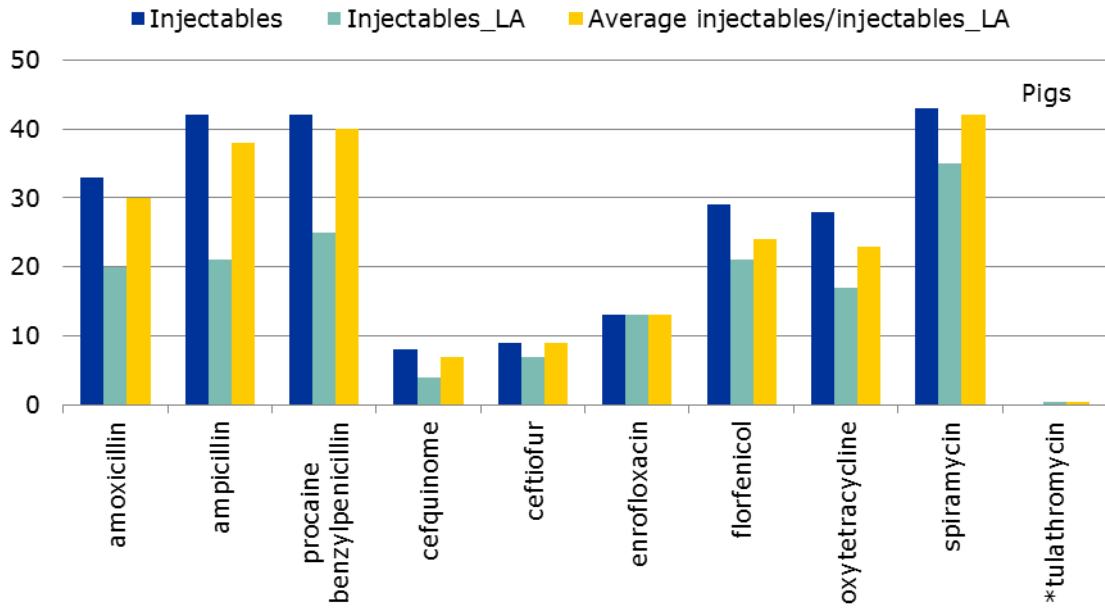
994 The preliminary DCDAs show that the DCDA for premix is not consistently higher than for other oral
995 forms, except for pigs. It is generally acknowledged that the main arena for implementing
996 management measures for the containment of AMR is at national/local level and thus valid measures
997 for changes across years within a country/locally are important. Recognizing DCDA is a technical unit
998 of measurement and that the same value (DCDA) will be used across years, it will allow for
999 identification of changes at country/local level. To assign the same DCDAs for all oral forms would
1000 make the list of DCDAs easier to manage in terms of analysing and reporting of the data and also for
1001 maintaining the list.

1002 **It is suggested to assign the same DCDA for all oral forms for each combination of**
1003 **antimicrobial and species. Exceptions will be identified in the lists of DDDA and DCDA**

1004 **4.3.2. Injectables**

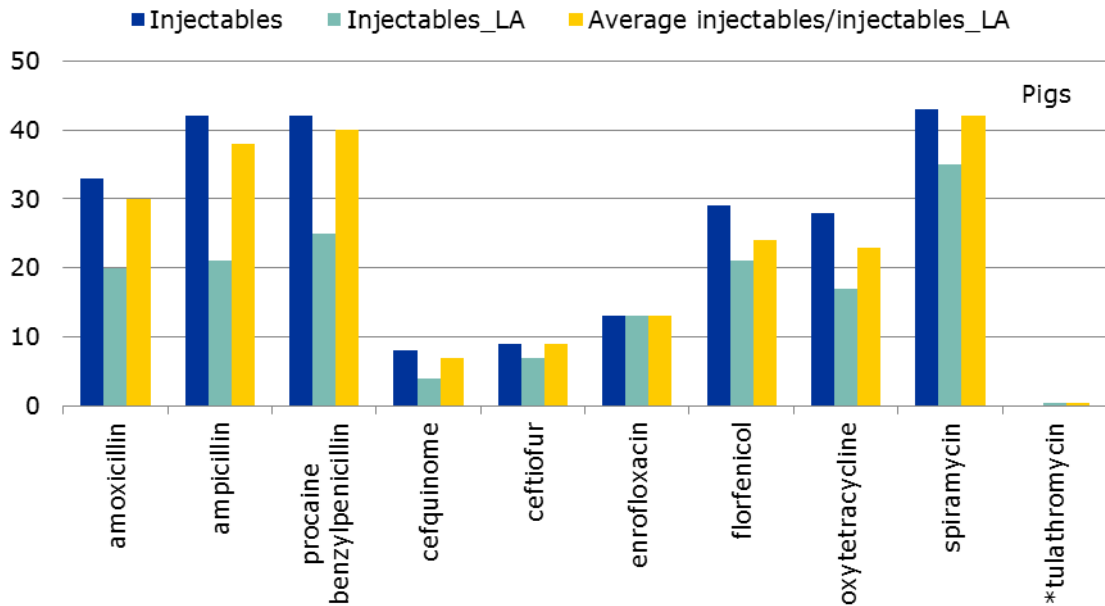
1005 In the data sets on dosing provided by the nine MSs a total of 12 single substance injectables were
1006 given as long-acting injectables for cattle and 10 VMPs for pigs by the MSs (Figure 24, Figure 25).

1007 **Figure 24.** Preliminary DCDAs (mg/kg) for injectables and long-acting injectables and the average of
 1008 these for cattle – single substance products



1009
 1010 * Long-acting only

1011 **Figure 25.** Preliminary DCDAs (mg/kg) for injectables and long-acting injectables and the average of
 1012 these for pigs - single substance products



1014
 1015 * Long-acting only

1016 For cattle and pigs the preliminary DCDAs were higher for all injectable substances compared to the
 1017 same substance in long-acting injectables except for enrofloxacin; the difference was biggest for

1018 ampicillin. For cattle the differences were higher than for pigs. This would have a substantial impact on
1019 the output. The difference between the average DCDA injectables and long-acting injectables
1020 compared to the DCDA (“ordinary”) injectables is minor. This is due to a substantially higher number of
1021 observations for injectables compared to LA injectables which then affects the average. This is
1022 explained by the relatively low numbers of LA injectables in the data sets compared to “ordinary”
1023 injectables.

1024 **It is suggested to assign the same DCDA for single substance injectables and long-acting**
1025 **injectables for each substance and species. Since different DDDAs are assigned for prodrugs**
1026 **and its active substance this is also suggested for DCDA.**

1027 **4.4. DCDA – combination products**

1028 **4.4.1. Oral forms**

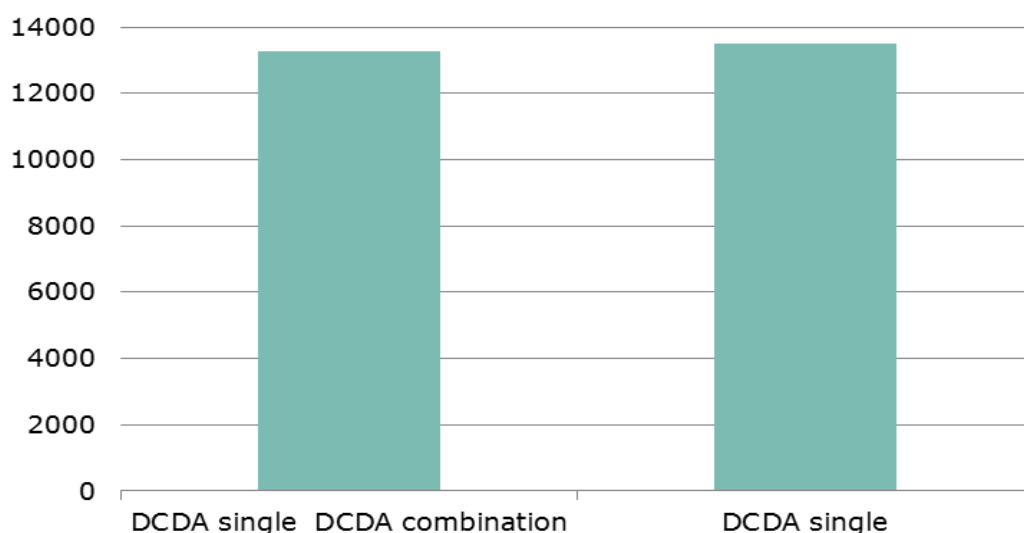
1029 The preliminary DCDA show that these may vary between single VMPs and combination VMPs for oral
1030 forms. The impact on the total output by applying DCDA for single substance oral VMPs for reporting
1031 consumption for the same substance in combination VMPs was assessed by use of sales data of
1032 amoxicillin and the preliminary DCDA.

1033 Sales of oral powder, oral solution and premix in 26 EU/EEA countries in 2012 as single substance
1034 VMPs were 1,321 tonnes and 96 tonnes for combinations.

1035 **4.4.1.1. Amoxicillin**

1036 The preliminary DCDA for amoxicillin in single and combination VMPs for broilers were 105 mg/kg and
1037 142 mg/kg, respectively.

1038 **Figure 26.** Estimated numbers of DCDA sold (millions) of amoxicillin oral powder, oral solution and
1039 premix as single and combination VMP calculated by application of DCDA single and DCDA combination
1040 respectively, and by application of DCDA single for the sales of both single and combination substance
1041 VMPs these forms assuming that the complete amount sold was used in broilers



1042

1043 The difference between the two outputs was 1.8%.

1044 **4.4.1.2. Oxytetracycline**

1045 Sales of oxytetracycline in 26 EU/EEA countries in 2012 of oral powder, oral solution and premix in
 1046 single substance VMPs were 1,185 tonnes and for combination VMPs it was 24 tonnes. In the analysis
 1047 it was assumed that all oral powder, oral solution and premix sold in the 26 EU/EEA countries were
 1048 given to pigs.

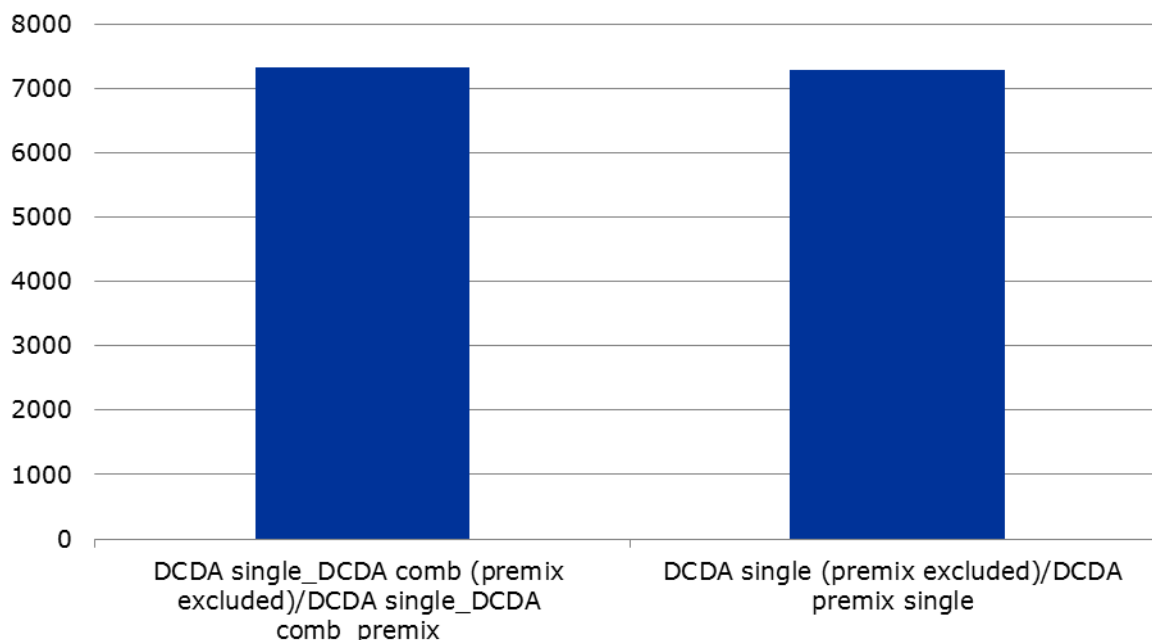
- 1049
- **Explanation of the axis shown in graph 27 and 28**
 - **DCDA single - DCDA comb (premix excluded)/DCDA single – DCDA comb premix =**
 (tonnes oral powder + oral solution single sold substance X /DCDA oral single - premix excluded) +
 (tonnes oral powder + oral solution combination sold substance X /DCDA oral combination - premix
 1052 excluded) + (tonnes single premix sold substance X/DCDA premix single) + (tonnes combination
 1054 premix sold substance X/DCDA premix combination substance)
 - **DCDA single (premix excluded)/DCDA premix single =** (tonnes powder + oral solution sold
 as single and combination VMP substance X)/DCDA oral single – premix excluded) + (tones premix
 1056 sold as single and combination VMP substance X/DCDA premix single)

1058 Preliminary DCDA for oxytetracycline aggregated by oral forms (weighted mean) were used for the
 1059 impact analyses (Table 19).

1060 **Table 19.** Preliminary DDDAs for oxytetracycline for pigs used in the analysis (Figure 27)

	DCDA single premix	DCDA single average orals forms (premix excluded)	DCDA combination premix	DCDA combinations average orals forms (premix excluded)
Pigs	266	94	150	94

1061 **Figure 27.** Estimated numbers of DCDA sold (millions) of oxytetracycline oral powder, oral solution
 1062 and premix as single or combination VMP calculated by using 1) DCDA single premix, DCDA single
 1063 average oral forms excluding premix, DCDA combination premix, DCDA combination average oral
 1064 forms excluding premix respectively, and by application of 2) DCDA single premix and DCDA single
 1065 average oral forms excluding premix single for the total sales of these forms assuming that all sales
 1066 were used for pigs



1067
 1068 The difference between the two outputs was 0.5 (Figure 27).

1069 The results (Figure 26, Figure 27) indicate that using the single DCDA for reporting sales of VMP has
 1070 almost no impact on the total output on calculated numbers of DCDA. The explanation for this is that
 1071 the amount sold as combination VMP is minor and the outputs were therefore not impacted by the
 1072 difference between DCDA single and DCDA combination.

1073 **It is suggested as a general rule to assign the single substance DCDA for the same**
 1074 **substance and species in a combination oral VMP. Exceptions are described in chapter 4.2.3.**

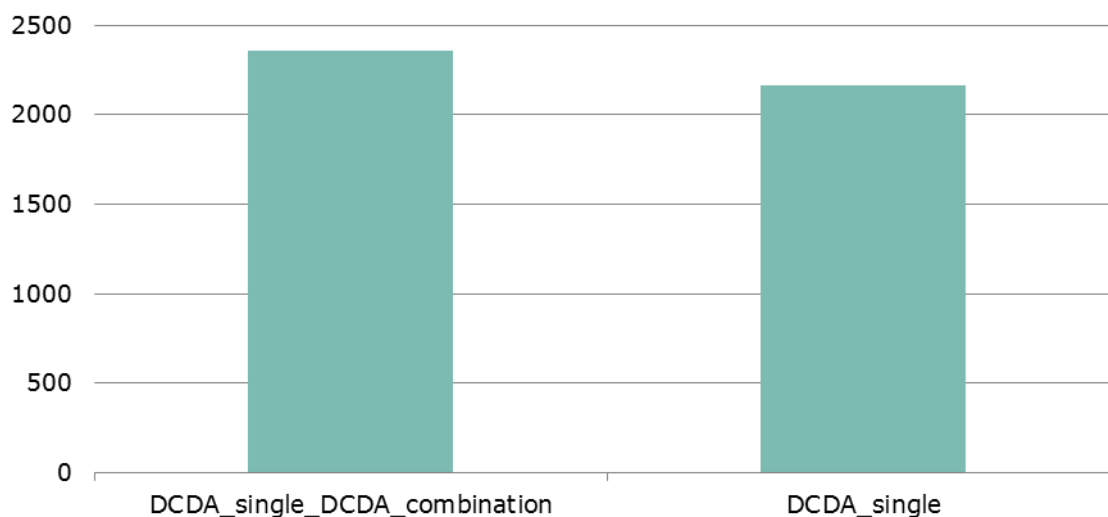
1075 4.4.2. Injectables

1076 The sales as combination VMPs of the most-selling single antimicrobial injectables in the 26 EU/EEA
 1077 countries were very low except for amoxicillin and benzylpenicillin (mainly sold as the prodrug procaine
 1078 benzylpenicillin). For amoxicillin, when compared to total sales, the proportion of injectable amoxicillin
 1079 was negligible. For combination injectables only two substances are given as long-acting in the same
 1080 VMP - procaine benzylpenicillin and benzathine benzylpenicillin. The sale of this combination in the
 1081 26 EU/EEA countries was negligible (ESVAC, unpublished data). The impact of using single substance
 1082 DCDA for injectables and long-acting injectables, respectively, for the same substance and species for
 1083 the substances in combination injectable, is therefore thought to be low. An exception is for the
 1084 prodrug procaine benzylpenicillin.

1085 The preliminary DCDA for the prodrug procaine benzylpenicillin as single and combination VMPs are
 1086 42 mg/kg and 26 mg/kg, respectively, for pigs. Benzylpenicillin is mainly sold as the prodrug procaine
 1087 benzylpenicillin; 78 tonnes as single and 13 tonnes as combination injectable VMPs (ESVAC sales 2012,

1088 unpublished data). These data and the preliminary DDDAs for the prodrug procaine benzylpenicillin as
1089 single and combination injectable VMPs were used for the impact analysis assuming that the complete
1090 sales were for pigs.

1091 **Figure 28.** Estimated numbers of DCDA sold (millions) of procaine benzylpenicillin injectable VMPs as
1092 single and combination VMP calculated either by using specific DCDA for single and combination
1093 products or by using DCDA for single products for all sales assuming that all procaine benzylpenicillin
1094 injectables was administered to pigs



1095

1096 If the single DDDA for procaine benzylpenicillin was applied to calculate sales of both single and
1097 combinations VMPs the numbers of DDDAs would be 8% lower compared to when calculated by single
1098 and combination DDDAs (Figure 28). The impact of assigning the single substance DCDA for the same
1099 substance and species in a combination injectable VMP on the overall output will be low.

1100 **It is suggested as a general rule to assign the single substance DCDA for the same**
1101 **substance in a combination injectable VMP.**

1102 **4.4.3. Synergistic combinations**

1103 See considerations outlined in chapter 4.2.3.

1104 **It is suggested to assign separate DCDA for single substance sulfonamide VMP and the**
1105 **same DCDA for sulfonamide in combination with trimethoprim.**

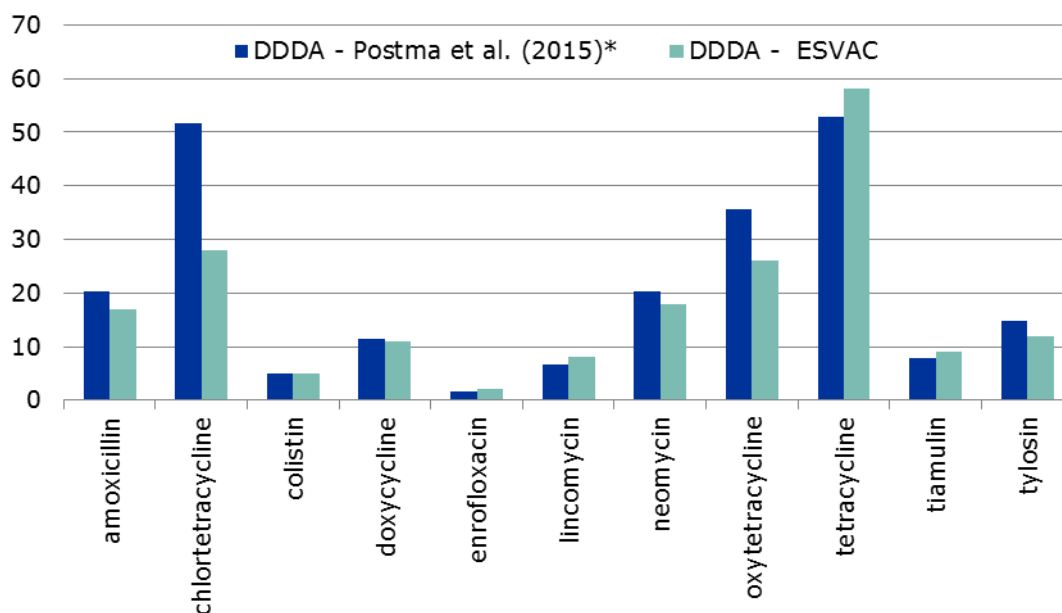
1106 **5. Discussion on preliminary DDDAs - ESVAC**

1107 In a recent paper DDDAs for pigs with data from four European countries – Belgium, France, Germany
1108 and Sweden - were published (Postma et al., 2015). A comparison between the DDDAs published in
1109 that paper and the preliminary ESVAC DDDAs for pigs was performed for the most-selling single
1110 substances in oral VMPs shown in Figure 29 and for injectables in Figure 30.

1111 In the study by Postma et al. (2015) the DDDAs were assigned separately for pharmaceutical forms for
1112 administration through water/feed and other oral forms, while for ESVAC it's suggested to assign the
1113 same DDDA by all oral forms for each substance and species. To facilitate the comparison, the DDDAs

1114 for administration through feed/water by Postma, Sjolund et al. 2015 and for oral ESVAC were used for
1115 the analysis.

1116 **Figure 29.** Comparison of DDDA assigned by Postma, Sjolund et al. 2015* for pharmaceutical forms
1117 to be administered through feed or water and ESVAC preliminary DDDAs for all oral forms for pigs.
1118 DDDAs is given in mg/kg

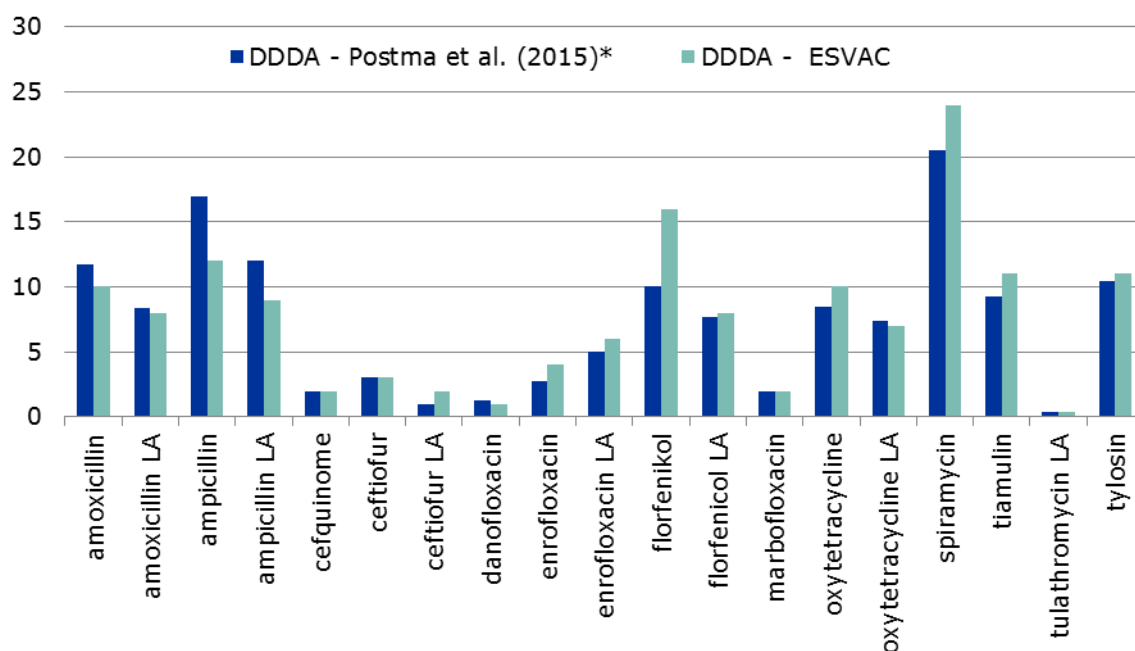


1119

1120 The DDDAs differed for all substances except for colistin but for most of the DDDAs the differences
1121 were minor. The largest deviation between the DDDAs is seen for chlortetracycline (Figure 29). The
1122 deviations between the DDDAs might be explained by the differences in number of countries involved
1123 (and thus number of VMPs) - Postma, Sjolund et al 2015 obtained data from four countries while
1124 ESVAC obtained data from nine countries.

1125 The DDDAs tended to be lower for ESVAC and this could partly be explained by the exclusion by ESVAC
1126 of outliers prior to assignment of the preliminary DDDAs. The ESVAC preliminary DDDAs are based on
1127 data from five more countries compared to Postma, Sjolund et al. 2015 and thus countries with higher
1128 daily doses (ESVAC) will have less impact on the average DDDAs; this could also explain the
1129 variations.

1130 **Figure 30.** Comparison of DDDAs assigned by Postma, Sjolund et al. 2015 for parenteral
 1131 pharmaceutical forms and ESVAC preliminary DDDAs for injectables and long-acting (LA) injectables
 1132 for pigs. DDDAs are given in mg/kg. The DDDAs for long-acting injectables by Postma, Sjolund et al.
 1133 2015 have been subdivided by the long-acting factor given for each substance



1134

1135 For three of the 18 DDDAs - cepquinome, ceftiofur and marbofloxacin (none long-acting) - the DDDAs
 1136 are identical (Figure 30); for seven other substances the difference was $\geq 20\%$. The difference tends to
 1137 be bigger for some of the none long-acting (e.g. florfenicol and spiramycin) compared to the long-
 1138 acting. These differences might be explained by the differences in number of countries involved. For
 1139 ampicillin the difference is of the same magnitude for injectables and long-acting injectables.
 1140 Differences between the DDDAs for the long-acting injectables could be due to different definition of
 1141 the treatment duration (long-acting factor) between Postma, Sjolund et al. 2015 and ESVAC.

1142 Note that Postma, Sjolund et al. 2015 include DDDAs for long-acting marbofloxacin and tylosin and
 1143 ESVAC DDDAs include gamithromycin and tilmicosin as LA injectables (data not shown in Figure 30).

1144 6. Reporting consumption of antimicrobials in animals

1145 The aim of this document is to provide principles for the assignment of DDDA and DCDA; but it is
 1146 important to also reflect on which indicators to be used for the reporting of data. Suggestions and
 1147 examples for reporting are given below. Further discussions are, however, needed on this subject prior
 1148 to reporting of data collected by species.

1149 6.1. Aim of reporting

1150 The indicator used should aim to fit the purpose of the reporting. In human medicine DDD was
 1151 established for the purpose of drug consumption studies and mainly in order to follow therapeutic
 1152 trends. The additional and main purpose of establishing DDDA and DCDA for veterinary antimicrobial
 1153 VMPs is to address antimicrobial resistance, which has been described in Chapter 6.

1154 It is suggested to apply indicators enabling to:

- 1155 1. Identify changes in antimicrobial consumption/consumption patterns by species/production
1156 type, antimicrobial class and weight group within a country;
- 1157 2. Identify differences in antimicrobial consumption/consumption patterns by species/production
1158 type, antimicrobial class and weight group across countries;
- 1159 3. Compare antimicrobial consumption between the human and animal sector.

1160 Of these, 1 and 2 are addressed below.

1161 **Human medicine**

1162 In human medicine the DDDs are assigned for an adult of 70 kg (WHO, 2015b). One of the main
1163 indicators applied to report consumption of antimicrobials in the EU/EEA area is numbers of DDD/1,000
1164 inhabitants/day per year; the consumption is usually reported on ATC level 3 (ECDC, 2015). The
1165 indicator applied to report consumption is numbers of DDD/1000 inhabitants/year.

1166 **Veterinary medicine**

1167 In veterinary medicine, DDDAs and DCDA will be assigned per kg animal for oral and injectable
1168 products. Based on this, DDDAs and DCDA can be calculated by weight group – e.g. for
1169 oxytetracycline the DDDA is 27 mg/kg giving 1,350 mg for finishers (ESVAC standardised weight for
1170 finisher: 50 kg, see Table 20). Slaughter pigs are usually slaughtered when 5-6 months old and for a
1171 part of those slaughtered in the beginning of a calendar year, part of their lifespan was during the
1172 previous calendar year. Broilers are usually slaughtered when they are less than 40 days old. In
1173 contrast to humans, slaughter pigs and broilers are not at risk of being treated during a whole year.
1174 The suggested indicators for the ESVAC data for reporting on consumption of veterinary antimicrobial
1175 agents are therefore numbers of DDDA or DCDA consumed/1,000 animals produced or livestock for
1176 each weight group/production type by country and year (EMA/ESVAC, 2013b).

1177 **6.1.1. Measuring changes within and across countries**

1178 For the following analyses consumption figures of oxytetracycline for pigs have been applied. Data on
1179 tonnes used and on numbers of pigs are invented numbers.

1180 To identify the consumption and consumption patterns of antimicrobials for the various production
1181 stages of pigs it is suggested to collect data for the weight groups and to apply the standard weight for
1182 calculation of DDDAs as shown in Table 20.

1183 **Table 20.** Animal species and weight groups/production type for which data on consumption for pigs
1184 will be collected in ESVAC. Average weight for reporting of data (adapted from reflection paper
1185 (EMA/ESVAC, 2013b))

Weight group/ production type	Age period	Average weight at treatment
Sows/boars	Any pig meant for production of piglets	220 kg
Suckling piglets	Birth to start of weaning	4 kg
Weaners	Weaning period	12 kg
Finishers	End of weaning period to slaughter	50 kg

1186 **6.1.1.1. Reporting by weight group**

1187 In order to measure changes in consumption within a specific weight group the approach shown in a
 1188 Table 21 and Table 22 is suggested. These are examples of calculating numbers of DDDA/1000
 1189 animals/year for oxytetracycline consumption in finishers (50 kg) that will identify changes across
 1190 years and differences between countries, respectively. The preliminary DDDA for oxytetracycline has
 1191 been applied for the calculation - 1.3 g for 50 kg finishers.

1192 **Table 21.** Consumption of oxytetracycline (OTC) oral powder, oral solution and premix, in numbers of
 1193 DDDA/1,000 finishers/year, for one country for the years 2011-2013

	Numbers finishers	OTC - tonnes used	DDDA finishers (g) – oral	DDDA/1000 finishers / year
2011	10,000,000	8.5	1.3	654
2012	10,400,000	8.0	1.3	592
2013	11,000,000	7.2	1.3	503

1194 **Table 22.** Consumption of oxytetracycline (OTC) oral powder, oral solution and premix, in numbers of
 1195 DDDA/1,000 finishers/year, for one year for countries A, B and C

	Numbers finishers	OTC - tonnes used	DDDA finishers (g) – oral	DDDA/1000 finishers / year
Country A	25,000,000	76	1.3	2,338
Country B	14,000,000	16	1.3	879
Country C	10,000,000	8	1.3	615

1196 The type of analysis shown above can be applied for all weight groups and will provide detailed
 1197 information on the changes within a country.

1198 **6.1.1.2. Reporting overall consumption by species**

1199 Data can also be reported as overall consumption in pigs by country and year by use of data on overall
 1200 consumption independently from collection by weight group. The indicator could be number
 1201 DDDA(kg)/1000 pigs produced/year - i.e. how many kg's pig of 1,000 pigs produced could have been
 1202 treated with the amount of antimicrobial used. The preliminary DDDA per kg pig for oral antimicrobials
 1203 applied for the analysis is 26 mg/kg. An example of the output is shown in Table 23.

1204 **Table 23.** Consumption of oxytetracycline (OTC) oral powder, oral solution and premix, in numbers of
 1205 DDDA(kg)/1,000 pigs/year, for one country for the years 2011-2013

	Numbers pigs produced	OTC - tonnes used	DDDA(kg) pigs - (mg) – oral	DDDA(kg)/1000 pigs produced/year
2011	10,000,000	9.9	26	38,077
2012	10,400,000	9.1	26	33,654
2013	11,000,000	8.0	26	27,972

1206 **6.1.2. Reporting consumption at farm level**

1207 Consumption data can also be reported at farm level, using the same units of measurement. In

1208 Table 24 an example is given of three treatments with oxytetracycline on a farm producing 4,000
 1209 slaughter pigs per year - numbers of pigs are invented.

1210 **Table 24.** Consumption of oxytetracycline (OTC) at farm level, reported by use of various units of
 1211 measurement. It is assumed that the farm produces 4,000 slaughter pigs per year

Treatment	DDDA (mg/kg)	DCDA (mg/kg)	Kg used active substance	No. DDDA _{kg}	No. DDDA	No. DCDA _{kg}	No. DCDA per weight group
A - 50 sows; injection; two doses: 10 mg/kg	10	23	0.22	22,000	100	9,565	43.5
B - 1,000 weaners; oral powder; dose: 25 mg/kg; 7 days	26	173	2.1	80,769	6,731	12,139	1,012
C - 50 weaners; injection; dose: 10 mg/kg; two doses	10	23	0.012	1,200	100	522	43.5
<i>Total on the farm</i>			2.332	103,969	6,931	22,226	1,099
Total per 1000 slaughter pigs			0.583	25,992	1,783	5,557	275

1212

1213 Appendix 2

1214 This appendix describes the instructions provided to the 9 MSs filling the ESVAC template for collecting
1215 SPC data.

1216 1. General instructions for the filling of the template

- 1217 • Data for centrally authorized products should also be filled in;
- 1218 • Data need only to be filled in for one pack size per VMP;
 - 1219 ○ Lines with other pack sizes may be deleted if preferred.
- 1220 • If preferred, lines with VMPs authorized for other species than the target species of the worksheet
1221 may be deleted;
- 1222 • Long-acting products:
 - 1223 ○ For the purpose of the data collection, a VMP is considered to be long-acting if it maintains
1224 therapeutic levels for at least 24 hours;
 - 1225 ○ Please indicate for long-acting products “YES” in the field for ‘Dosing interval > 1 day
1226 (yes/no)’, and give the duration of effect in days in the field ‘Duration of effect (days) if it
1227 is given in the SPC; else record “999”;
 - 1228 ○ The number of treatment days should be given for the whole period during which the
1229 animals are exposed to the VMP (i.e., when a long-acting VMP should be administered
1230 twice and a treatment interval of two days is given in the SPC, the number of treatment
1231 days should be recorded as four);
 - 1232 ○ When a long-acting product is intended to be administered once, the ‘Duration of effect
1233 (days)’ should be given as “NA” (Not Applicable), and the ‘Dosing interval >1 day’ should
1234 be answered with “YES”;
 - 1235 ○ Please give ‘Duration of effect’ in number of days if it is given in the SPC; else record
1236 “999”.
- 1237 • Intramammary products:
 - 1238 ○ Abbreviations in worksheet ‘Examples Intramammary’: LC - lactating cows, DC – dry cow;
 - 1239 ○ For dry cow treatment (INTRAMAM-DC): treatment is once and for four teats;
 - 1240 ○ For lactating cows (INTRAMAM): dose per teat per day.
- 1241 • Using the ‘Comments’ field:
 - 1242 ○ Use the field sparsely: only fill in particular cases, e.g. when dose or length of treatment
1243 information is unspecified, or when different doses for different indications are given (see
1244 examples in chapters 3-7).
- 1245 • Please give intervals in number of days;
- 1246 • Please make sure to use a ‘.’ (period) as the decimal sign.

1247 SPCs sometimes give unclear information on daily dose and treatment duration, including different
 1248 dosing for various age classes. Below, examples on how to deal with these issues when filling in the
 1249 SPC information are shown. When information is missing, the code '999' can be used to indicate a
 1250 missing value. Examples of the use of '999' are shown below.

1251 2. Detailed instructions

1252 If the main indication is clear, dosing should always be entered for this.

1253 2.1. Main indication unclear

Example of SPC information	How to fill in template
<i>Marbofloxacin 100 mg/ml (injection):</i> Dose: respiratory disease one injection of 8 mg/kg or mastitis 2 mg/kg for 3 days	Enter the lowest and highest dose given, regardless of the indication (i.e. 2 mg/kg and 8 mg/kg). Add a comment in the comment section (i.e. represents range of the two indications). Treatment duration should also be entered as minimum and maximum number of days (i.e. 1 and 3 days).

1254 2.2. Therapeutic or preventive use

1255 Indicated for both therapeutic and preventive use

Example of SPC information	How to fill in template
<i>Colistin (oral powder):</i> Therapeutic dose: 4-8 mg/kg Disease prevention dose: 2-4 mg/kg	Give lowest and highest dose in the template (i.e. 2 and 8 mg/kg), and add a comment in the comments field (i.e. represents therapeutic and prevention use).
<i>Tiamulin (premix):</i> One indication 8 mg/kg for 10 days, other indication 1.6 mg/kg for 42 days	Give lowest and highest dose in the template (i.e. 1.6 and 8 mg/kg) and minimum and maximum number of days for treatment duration (i.e. 10 and 42 days), and add a comment in the comments field (i.e. represents therapeutic and prevention use).

1256 2.3. Daily dose

1257 Both daily dose and one long-acting dose given for the same VMP

Example of SPC information	How to fill in template
<i>Oxytetracycline (injection):</i> Daily dose 5-10 mg/kg; long-acting dose 20 mg/kg	Enter product twice ¹ in template (i.e. in two lines): one line with information about daily dose etc. and one line with information about long-acting dose. Give the reason/explanation in the comment section (i.e. long-acting).

1258 ¹Or as many times as necessary according to the information given in the SPC.

1259 **Different daily doses for young and adult animals**

Examples of SPC information	How to fill in template
<p><i>Spiramycin (injection):</i></p> <p>Dose: for veal calf 75000 UI/kg, for cattle 30000 UI/kg</p>	<p>Give lowest and highest daily dose in the template (i.e. 30,000 and 75,000 UI/kg).</p>
<p><i>Cefquinome (injection):</i></p> <p>Dose for veal calf 2 mg/kg for 3 days, for cattle 1 mg/kg for 3-5 days</p>	<p>Give lowest and highest daily dose in the template (i.e. 1 and 2 mg/kg) and minimum and maximum number of days for treatment duration (i.e. 3 and 5 days).</p>

1260 **Two different doses for the same product presentation and indication**

Examples of SPC information	How to fill in template
<p><i>Florfenicol (injection):</i></p> <p>Dose: two injections of 20 mg/kg or one injection of 40 mg/kg</p>	<p>Give lowest and highest daily dose in the template (i.e. 20 and 40 mg/kg) and minimum and maximum number of treatments (i.e. 1 and 2), and add in the comments field: two injections of 20 mg/kg or one injection of 40 mg/kg.</p>

1261 **Dose is given in ppm**

Example of SPC information	How to fill in template
<p><i>Tylosin (premix):</i></p> <p>Dose: 40-100 g/1,000 kg feed</p>	<p>Leave the daily dose variable fields empty, and give the information in the comment section (i.e. dose: 40-100 g/1,000 kg feed).</p>

1262 Based on standardised feed and water intake per animal species/weight group (where applicable)
 1263 ESVAC will calculate ppm into mg/kg.

1264 **Dose is given per animal and not in mg/kg**

Example of SPC information	How to fill in template
<p><i>Dihydrostreptomycin (injection):</i></p> <p>Dose: 5 g of dihydrostreptomycin per animal (one injection)</p>	<p>Leave the daily dose variable fields empty, and give the information in the comment section (i.e. daily dose: 5 g/animal).</p>

1265 ESVAC will calculate dose into mg/kg by use of standardised average weight per animal species

1266

1267 **2.4. Treatment duration**

1268 **Unclear upper limit of treatment duration**

Examples of SPC information	How to fill in template
<i>Benzylpenicillin (injection):</i> Dosing: 20 mg/kg; for at least 3 days	Lower limit: 3; upper limit: 999 Give description in comments.
<i>Trimethoprim and sulfadiazine (injection):</i> Dosing: 12-24 mg/kg; till 2 days after symptoms disappear	Lower limit: 3; upper limit: 999 Give description in comments.

1269 **Unclear lower and upper limit of treatment duration**

Examples of SPC information	How to fill in template
<i>Trimethoprim and sulfadoxine (injection):</i> Dosing: 12-24 mg/kg; until symptomless 2 days	Lower limit: 999; upper limit: 999 Give description in comments.
<i>Oxytetracycline (oral powder):</i> Dosing: 40 mg/kg; length not given	Lower limit: 999; upper limit: 999 Give description in comments.

1270 **Unclear treatment duration**

Example of SPC information	How to fill in template
<i>Enrofloxacin (injection):</i> Dosing: in some cases two injections are necessary	Give 999 for number of days and in the comment field: in some cases two injections are necessary

1271 **2.5. Other issues**

1272 **Unclear dosing interval of long-acting antimicrobial VMPS**

Example of SPC information	How to fill in template
<i>Danofloxacin (injection):</i> Dosing: 6 mg/kg; interval 36-48 hrs "if needed"	Give the interval (i.e. 1.5 – 2 days), comment field: interval 36-48hrs "if needed".

1273

1274 Appendix 3

1275 1. References

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1311
1312

1313 Appendix 4

1314 1. Water and feed intake

1315 Water and feed intake calculations are required to provide an estimate of antimicrobial consumption
1316 per mg/kg body weight when the dose is only provided as a portion of the feed or water intake.

1317 An online search was performed to identify daily feed and water intake by the three species (pig,
1318 broiler and cattle). The data sources are listed per species in the reference list at the end of this
1319 appendix.

1320 The proposed standardised feed and water intake for the three species (Table 1) was calculated by first
1321 calculating the average intake given by each data source, and then calculating arithmetic mean of all
1322 data per species. Only sources enabling calculation of intake per kilogram animal were used; i.e.
1323 sources providing data per animal were excluded if no weight indication was given. Feed intake for
1324 cattle is based on dry matter intake.

1325 It should be noted that sound data on feed/water intake per kg animal was sparse, especially for cattle
1326 and broilers and that the data in Table 1 may be revised following the consultation period.

1327 **Table 1.** Standard feed and water intake for broilers, cattle and pigs applied for the calculation of dose
1328 in mg/kg animal

Species	Feed intake (kg/kg animal)	Water intake (l/kg animal)
Broiler	0.13	0.23
Cattle	0.02	0.10
Pig	0.04	0.10

1329 The feed and water intake will vary for many reasons including amongst others age, production type
1330 and health status amongst others. The data on water and feed intakes is therefore a compromise
1331 aiming at standardization.

1332 2. References for water and feed intake

1333 Broilers

1334 Gardiner and Hunt. Water consumption of meat-type chickens. Can. J. Anim. Sci. (1984); 64: 1059-
1335 1061

1336 Hubbard Management Guide Broiler (2014)

1337 (http://www.hubbardbreeders.com/media/hubbard_broiler_management_guide_078897700_0945_07012015.pdf)

1339 Ontario Ministry of Agriculture, Food and Rural Affairs. Water requirements of livestock in Ontario.
1340 (2007) (<http://www.omafra.gov.on.ca/english/engineer/facts/07-023.htm>)

1341 Pesti et al. Water consumption of broiler chickens under commercial conditions. Poultry Science
1342 (1985); 64: 803-808

- 1343 Vencobb Broiler Management Guide (2014) ([http://www.venkys.com/vh-breeds/vencobb-broiler-](http://www.venkys.com/vh-breeds/vencobb-broiler-broiler-breeder/vencobb-100-broiler/)
1344 [broiler-breeder/vencobb-100-broiler/](http://www.venkys.com/vh-breeds/vencobb-broiler-broiler-breeder/vencobb-100-broiler/))
- 1345 **Cattle**
- 1346 British Columbia Ministry of Agriculture and Lands. Livestock watering requirements – Quantity and
1347 Quality. (2006) (<http://www.agf.gov.bc.ca/resmgmt/publist/500Series/590301-1.pdf>)
- 1348 Merck Manuals Feeding guidelines for large-breed dairy cattle (2014)
1349 (http://www.merckmanuals.com/vet/management_and_nutrition/nutrition_cattle/nutritional_requirements_of_dairy_cattle.html#v4638295)
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- 1351 Report to European Commission (ERM, 1999) in report Nitrogen output of livestock excreta (July 2007;
1352 ADAS report to DEFRA)
- 1353 **Pigs**
- 1354 Extracted from: Carr. Garth Pig Stockmanship Standards. (1998)
1355 (<http://www.thepigsite.com/stockstds/18/daily-feed-intake>)
- 1356 Hendersons. Growing Pig Daily Feed & Water
1357 intake. (http://www.hendersons.co.uk/pigequip/Pig_growth_rate.html)
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1359 intakes for growing swine by age in weeks.
1360 (https://extension.usu.edu/cache/files/uploads/Project_Pig_Planner.pdf)
- 1361 Lammers, Stender and Honeyman. Niche Pork production, Iowa State University. Feed and Growth.
1362 IPIC NPP340. (2007) (<http://www.ipic.iastate.edu/publications/IPICNPP.pdf>)
- 1363 May. Michigan State University Extension. Estimating water usage on Michigan Swine Farms.
1364 (http://msue.anr.msu.edu/uploads/236/43605/lyndon/Water_Use_for_Swine_Farms.doc)
- 1365 Merck Manuals. Nutritional Requirements of Pigs (2011)
1366 (http://www.merckmanuals.com/vet/management_and_nutrition/nutrition_pigs/nutritional_requirements_of_pigs.html)
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- 1368 Ontario Ministry of Agriculture, Food and Rural Affairs. Water requirements of livestock in Ontario.
1369 (2007) (<http://www.omafra.gov.on.ca/english/engineer/facts/07-023.htm>)
- 1370 Swine handbook nutrition and feeds (http://mysrf.org/pdf/pdf_swine/s1.pdf)
- 1371 Zimmerman et al. Diseases of Swine. (2012).
1372 (<https://books.google.co.uk/books?id=jVaemau17J4C&pg=PA10&lpg=PA10&dq=veterinary+practice+section+table+1.3+recommended+water+requirements&source=bl&ots=MZ1nepeps0&sig=5M4kRtU3ZgPUFtFHPAcyWs0u-f0&hl=en&sa=X&ei=9uaXVKtMYv4UtnygKAL&ved=0CCEQ6AEwAA#v=onepage&q=veterinary%20practice%20section%20table%201.3%20recommended%20water%20requirements&f=false>)
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