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- 3 Updated advice on the use of colistin products in animals
- 4 within the European Union: development of resistance
- 5 and possible impact on human and animal health
- 6 Draft

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1. Executive summary

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109 Colistin is an antibacterial agent of the polymyxin class. Following the discovery of a new colistin

horizontally transferable resistance mechanism (MCR-1), the European Commission requested the

- 111 European Medicines Agency to update the previous advice on the impact of and need for colistin use
- for human and animal health (EMA, 2013). This updated advice provides an analysis of the colistin
- toxicity, susceptibility testing, activity and resistance mechanisms, risk profile (based upon the
- consumption patterns and epidemiology), and risk management options.
- Soon after its introduction in the 1950s, the use of colistin in human medicine was predominantly
- restricted to topical administrations due to its toxicity if given systemically. Severe nosocomial
- infections due to multidrug-resistant (MDR) Gram-negative bacteria increasingly account for high
- morbidity and mortality and colistin is therefore nowadays a last resort drug in human medicine in the
- 119 context of systemic treatment of infections caused by MDR *Pseudomonas aeruginosa, Acinetobacter*
- 120 baumannii and Enterobacteriaceae (Escherichia coli, Klebsiella pneumoniae). The prospect of novel
- alternative antimicrobials for treatment of infections due to MDR pathogens in the near future is
- 122 limited. The main indications for systemic use in human medicine are treatment and control of
- infections in cystic fibrosis patients and treatment of severe systemic infections. In some countries oral
- colistin is in addition used in prophylaxis of healthcare-associated infections through selective digestive
- tract decontamination (SDD). Total consumption of colistin in humans (reflecting topical, inhalational
- and systemic routes of administration combined) varies widely between European Union/European
- 127 Economic Area (EU/EEA) countries but has doubled in some of EU/EEA countries between 2010 and
- 128 2014 following the rise in MDR Gram negative pathogens involved in healthcare-associated infections.
- 129 Under routine laboratory conditions a broth dilution methodology is recommended to determine colistin
- resistance. Care should be taken for proper identification to avoid overestimation of acquired colistin
- resistance due to some intrinsically less susceptible bacteria (Salmonella spp.) Bacteria containing
- antimicrobial resistance genes can be selected through the use of colistin. Spread may be via passing
- on chromosomal genes to daughter colonies (vertical transmission) or via mobile genetic elements
- 134 (horizontal transmission).

- 135 In isolates from humans, colistin resistance due to chromosomal mechanisms has increased
 - dramatically in some countries including Greece and Italy but resistance levels are now also increasing
- in most other EU/EEA countries. Mobile (transferable) colistin resistance, mediated by the mcr-1 gene,
- has been documented in several EU/EEA countries. This is of great concern due to the rapidly
- increasing use of colistin in EU/EEA hospitals leading to increased selection pressure. Furthermore,
- other antimicrobial classes can further stimulate the spread of colistin resistance via co-selection when
- there is simultaneous presence of such resistance genes (i.e. beta-lactamases, including
- 142 carbapenemases). The mcr-1 gene was found in similar plasmids in the same bacterial species isolated
- 143 from food-producing animals, food, humans and the environment indicating a possible transmission
- between these compartments. Nevertheless the overall prevalence of colistin resistance in animals
- remains so far and with some exceptions low in food and in animals in the EU/EEA. Even though
- retrospective studies on collections of isolates have shown that the *mcr-1* gene has been present in
- 147
- some bacterial species for decades, data from China indicate that the situation is changing and that the
- prevalence of such strains is increasing. The *mcr-1* gene is present both in isolates from clinical cases of veterinary colibacillosis and in invasive human pathogens. Human carriers can become negative
- within one month in the absence of a selection pressure. The relative proportion amid human clinical
- isolates in the EU/EEA remains fairly low (less than 1%), so far.

- 152 Colistin has been used regularly in veterinary medicine for decades, both as curative treatment and for
- prevention of disease. It is of therapeutic importance for the treatment of Gram-negative
- gastrointestinal infections in certain food-producing species. Colistin is predominantly administered as
- group treatment using the oral route of administration. In 2013, polymyxins (mainly colistin) were the
- 5th most sold group of antimicrobials (6.1 %) based on the total sales of polymyxins in 26 EU/EEA
- 157 countries reporting data. The possible alternatives to colistin, depending on the resistance situation in
- a particular country, include aminopenicillins, trimethoprim, sulphonamides, tetracyclines,
- aminoglycosides, cephalosporins and fluoroquinolones. If colistin is no longer available in veterinary
- medicine it could be speculated that other antimicrobials or medication would replace its use if no
- 161 concomitant interventions such as vaccination or improved biosecurity measures are taken.
- 162 The larger abundance of the *mcr-1* gene in veterinary isolates compared to human isolates, together
- 163 with the much higher use of colistin in livestock compared to human medicine, and the finding of the
- 164 mcr-1 gene along with genetic determinants typically seen in animal environments, has been
- 165 considered suggestive of a flow from animals to humans.
- 166 In December 2014 the CVMP recommended to restrict the indications for use of colistin to treatment of
- enteric infections caused by susceptible non-invasive *E. coli* only, that any indications for prophylactic
- use should be removed and that the treatment duration should be limited to the minimum time
- necessary for the treatment of the disease and not exceed 7 days. In addition, it was recommended to
- 170 remove horses from the Summary of Product Characteristics (SPCs) on the grounds of target species
- safety concerns. In April 2016 the CVMP recommended the withdrawal of the marketing authorisations
- for all veterinary medicinal products containing colistin in combination with other antimicrobial
- 173 substances.
- 174 There is a wide variation between European Union (EU) Member States (MS) in the extent of veterinary
- use of colistin. From the data available the variation cannot be directly linked to the predominance of
- 176 specific animal species, a category or husbandry system in an individual MS, with some MS having a
- 177 low level or no use of the substance, suggesting that there is scope to decrease the overall use of
- 178 colistin within the EU.
- 179 Antimicrobial use in both human and veterinary medicine must be rationalised and reserved for clinical
- 180 conditions. Further to previous advice, the Antimicrobial Advice ad hoc Expert Group (AMEG) main
- 181 recommendations, which were endorsed by the CVMP and the CHMP are that colistin sales for use in
- animals should be reduced to the minimum feasible (see below) and that colistin should be added to a
- higher risk category (category 2) of the AMEG classification (EMA, 2014a).
- 184 There are wide variations in the use of colistin adjusted for the biomass under exposure (kg livestock,
- expressed as population correction unit (PCU))¹, between countries and these are largely unexplained.
- 186 Countries with intensive livestock production can have a level of usage below 1 mg/PCU (e.g. Denmark
- and the UK) or much higher, up to 20 to 25 mg/PCU (Italy and Spain). Considering the rapidly
- increasing importance of colistin for treatment of critically ill human patients, all countries should strive
- to reduce the use of polymyxins as much as possible.
- 190 For the current "high and moderate consumers" the target and desirable levels are set at 5 mg/PCU
- and 1 or below 1 mg/PCU, respectively, based on the observations on the level of use in other
- 192 countries. Meanwhile more information should be gathered to determine the minimum level of colistin

¹ The population correction unit (PCU) corresponds to the food-producing animal population that can be subject to treatment with antimicrobial agents, for further details see: http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/document_listing/document_listing_000302.jsp&mid=WC_0b01ac0580153a00&jsenabled=true

- use that can be achieved while maintaining animal welfare and preventing the increased use of other
- 194 Critically Important Antimicrobials (CIAs).
- 195 Reduction in use of colistin should be achieved without an increase in the use (in mg/PCU) of
- 196 fluoroquinolones, 3rd- and 4th-generation cephalosporins or overall consumption of antimicrobials.
- 197 The above targets for reduction in sales of colistin should be achieved in a period of 3 to 4 years.
- 198 If the situation regarding colistin resistance in animals or humans further deteriorates, it may be
- 199 necessary to lower the proposed targets.

2. Introduction

- The global emergence and steady increase in bacteria that are resistant to multiple antimicrobials has
- 202 become a public health threat (Carlet et al., 2012). Human infections with MDR bacteria are associated
- 203 with higher patient morbidity and mortality, higher costs and longer length of hospital stay (Cosgrove,
- 204 2006; Hauck et al., 2016; Schorr, 2009). In the current state of increasing resistance coupled with a
- decrease in the availability of new antibiotics, there is a need to explore all options that would allow, as
- far as possible, the preservation of the current antimicrobial armamentarium (ECDC/EMEA, 2009).
- 207 Colistin (polymyxin E) is a cationic, multicomponent lipopeptide antibacterial agent discovered soon
- after the end of the Second World War (1949). An antibiotic originally named "colimycin" was first
- isolated by Koyama et al, from the broth of *Paenibacillus (Bacillus) polymyxa* var. *colistinus* in 1950
- 210 (Koyama et al., 1950).
- 211 In human medicine, colistin was early on predominately restricted to topical use due to its systemic
- 212 toxicity (Nord and Hoeprich, 1964). The last 10 years, increasing numbers of hospital outbreaks with
- 213 carbapenemase-producing Enterobacteriaceae (E. coli, Klebsiella species), and multidrug-resistant
- 214 (MDR) Pseudomonas and Acinetobacter species (i.e. non-fermentative Gram-negative bacteria), have
- 215 forced clinicians to re-introduce systemic colistin treatment, as a last resort drug for the treatment of
- 216 healthcare-associated infections in which these organisms are involved. Colistin therefore increasingly
- 217 has a key role for public health, despite all the limitations deriving from its safety profile and
- uncertainties around the best way of using it (Nation and Li, 2009). Also, colistimethate sodium (CMS)
- 219 is used by inhalation for the treatment of *Pseudomonas aeruginosa* lung infections in patients with
- 220 cystic fibrosis. In certain countries prophylaxis of healthcare-associated infections by means of
- 221 selective digestive tract decontamination (SDD) also includes the use of colistin in the antimicrobial
- 222 regimen.
- 223 Colistin has been used for decades in veterinary medicine, especially in swine and veal calves. Based
- on SPCs (prior to the last referral procedures, see chapter 3.2. for further details) Gram-negative
- infections of the intestinal tract, due to *E. coli* and *Salmonella* spp. were the primary indications. Most
- of the colistin applications in animals are for oral group treatments.
- 227 In July 2013 the AMEG was convened on behalf of the European Commission (EC) by the European
- 228 Medicines Agency (EMA) and concluded that 'for colistin use in particular, detailed monitoring of colistin
- 229 resistant bacteria is required to confirm horizontal gene transfer is not involved and that overall
- 230 prevalence remains low. As soon as colistin resistance determinants are found on mobile genetic
- 231 elements in the bacteria of concern as well as from human or animal origin, or a clonal explosion of
- virulent bacteria takes place, a new risk assessment would be required' (EMA, 2013).

233 In light of this recommendation, and following the recent discovery of mcr-1, a horizontal transferable

resistance gene in bacteria of food animal origin (Liu et al., 2015), the impact of the current or future

use of colistin products in veterinary medicine for animal health and welfare has been re-assessed.

3. The use of colistin in human and veterinary medicine

3.1. Human medicine

234

236

- Due to the major concerns for neuro- and nephrotoxicity (Koch-Weser et al., 1970; Ryan et al., 1969),
- 239 parenteral use of polymyxins has until recently been limited and polymyxins were mainly for
- ophthalmic and topical use (Falagas and Kasiakou, 2005; Koch-Weser et al., 1970). Cystic fibrosis
- 241 patients have been an exception to this practice for decades, and such patients have received systemic
- or nebulised colistin to control lower airway bacterial infections and complications (Beringer, 2001;
- Tappenden et al., 2013). During the last five years two major indications have renewed the interest for
- 244 polymyxin in human medicine, namely as part of surgical prophylaxis via selective digestive tract
- decontamination (SDD) and for MDR Gram-negative healthcare-associated infections.
- 246 For human patients, two salt forms of polymyxin E (colistin) have been widely commercially available,
- 247 namely colistin sulphate and colistimethate sodium (CMS, syn colistin methanesulphate, colistin
- 248 sulphonyl methate, pentasodium colistimethanesulphate). CMS is a prodrug of colistin microbiologically
- inactive (Bergen et al., 2006) and less toxic than colistin sulphate (Li et al., 2006). It is administered
- 250 predominantly as parenteral formulations and via nebulisation (Falagas and Kasiakou, 2005). After
- administration, CMS is hydrolysed to colistin, which is the base component that is responsible for its
- antibacterial activity (Lim et al., 2010). Besides polymyxin E (colistin), polymyxin B is also widely used
- in human medicine. Although parenteral formulations exist and are used in various parts of the world,
- in the EU/EEA polymyxin B is used only for topical administration in humans. Polymyxin B has been
- reported to be associated with a similar or even worse toxicity pattern than colistin when administered
- 256 systemically (Ledson et al., 1998; Nord and Hoeprich, 1964).
- 257 Colistin sulphate is available in tablets and syrup for selective digestive tract decontamination (SDD)
- and as topical preparations for skin infections. CMS is available for administration intravenously,
- 259 intramuscularly as well as topically via aerosol (nebulisation) or intraventricular administration.
- 260 Polymyxin B is available in parenteral formulations and can be administered intravenously,
- intramuscularly, or intrathecal.
- 262 Healthcare-associated infections caused by MDR Gram-negative organisms are being increasingly
- reported, especially in patients in intensive care units and haematology/oncology units (Zarb et al.,
- 264 2012). Colistin has re-emerged as a last-resort therapeutic option to treat infections due to
- 265 multidrug-resistant (MDR), lactose-fermenting and -non-fermenting Gram-negative bacilli, including *P.*
- 266 aeruginosa and Acinetobacter baumannii, for which there is a growing unmet medical need. In
- 267 particular, clinicians nowadays increasingly have to resort to colistin to treat nosocomial infections in
- 268 critically ill patients, such as bacteraemia and ventilator-associated pneumonia (VAP), due to
- carbapenem-resistant Gram-negative bacteria (Daikos et al., 2012; Petrosillo et al., 2013). In most
- 270 cases these carbapenem-resistant organisms produce a serine-based carbapenemase (e.g. the KPC or
- OXA enzymes) (Canton et al., 2012) or a metalloenzyme (e.g. the New Delhi Metallo-β-Lactamase 1,
- NDM-1 and the Verona integron-encoded metallo-β-lactamase, VIM) (Bogaerts et al., 2010; Cornaglia
- et al., 2011; Kumarasamy et al., 2010). These bacterial strains appear to be spreading within the EU
- and have become a major problem in some centres/countries (ECDC, 2016; Huang et al., 2011).

275 Colistin in combination with other antibiotics such as tigecycline or carbapenems is used in some

276 countries as limited available treatment options for carbapenemase-producing Enterobacteriaceae,

- 277 Acinetobacter spp. and Pseudomonas spp. (Daikos et al., 2012; Qureshi et al., 2012; Tumbarello et al.,
- 278 2012). A recent randomised trial failed to establish a clinical benefit for the combination of colistin with
- 279 rifampicin for the treatment of serious infections due to extremely drug-resistant (XDR) Acinetobacter
- baumannii, despite synergism was shown in vitro (Durante-Mangoni et al., 2013).
- The use of colistin by inhalation as adjunctive therapy or as monotherapy for treatment of VAP has also
- been explored (Lu et al., 2012; Michalopoulos and Falagas, 2008; Rattanaumpawan et al., 2010);
- 283 larger randomised trials are needed in order to conclude on the utility of this approach.
- Available evidence, mainly from old case series, suggests that systemic colistin is an effective and
- 285 acceptably safe option for the treatment of children without cystic fibrosis who have MDR Gram-
- 286 negative infections (Falagas et al., 2009). For MDR and XDR Gram-negative infections, a recent survey
- among 94 children has found colistin to be non-inferior to a non-colistin treatment group (Ozsurekci et
- al., 2016), although in both groups infection-related mortality was high (11% and 13.3%,
- 289 respectively).
- 290 The major adverse effects of the systemic use of colistin in humans are nephrotoxicity (acute tubular
- 291 necrosis), and neurotoxicity such as paraesthesia, dizziness/vertigo, weakness, visual disturbances,
- confusion, ataxia, and neuromuscular blockade, which can lead to respiratory failure or apnoea
- 293 (Falagas and Kasiakou, 2005). Older studies show a much higher frequency of neurotoxicity and
- occasionally irreversible nephrotoxicity (approximately 7%), compared to more recent studies. The
- 295 exception is cystic fibrosis patients in whom up to 29% adverse (neurological) effects have been
- reported (Bosso et al., 1991; Reed et al., 2001). The need for higher doses of CMS to achieve
- adequate colistin concentrations for therapeutic effect, as shown in recent studies (Garonzik et al.,
- 298 2011; Plachouras et al., 2009), raises concerns around the consequent further increase in
- 299 nephrotoxicity (Pogue et al., 2011). To contain toxic side-effects following systemic use of colistin,
- 300 close monitoring of renal function and avoidance of co-administration with other nephrotoxic agents
- 301 (e.g. aminoglycosides) are recommended (Falagas and Kasiakou, 2005). New derivatives of
- polymyxins, with a more favourable toxicity profile are under evaluation (Vaara and Vaara, 2013).
- 303 The use of parenteral colistin to treat serious human infections was hampered in the past by remaining
- uncertainties regarding the optimum dose regimen, by the use of different ways to describe and
- express the dose (in grams colistin base and as International Units) and by the uncertainty regarding
- 306 what is actually delivered as active substance to the patient (Garonzik et al., 2011; Mohamed et al.,
- 307 2012; Vicari et al., 2013). In the context of a recent article 31 referral procedure of Directive
- 308 2001/83/EC, the EMA Committee for Human Medicinal products (CHMP) reviewed the existing evidence
- and decided to revise the approved indication so that colistin can be used without age restrictions, but
- only for the treatment of infections with limited treatment options. The posology and method of
- administration section of the Summary of Product Characteristics (SmPC) were revised, and the need
- of a loading dose was agreed upon. No firm recommendations could be nevertheless made for patients
- with hepatic or renal impairment and for patients on renal replacement therapy, due to the scarcity of
- data for these subpopulations (EMA, 2014b)^{2,3}. Within the same framework, the CHMP also reviewed
- 315 the optimal way of expressing the strength and dose of colistin and agreed that the EU product
- information for CMS will continue to be expressed in International Units (IU). At the same time, a dose

http://www.ema.europa.eu/docs/en_GB/document_library/Referrals_document/Polymyxin_31/WC500179663.pdf

³ http://www.ema.europa.eu/docs/en_GB/document_library/Referrals_document/Polymyxin_31/WC500176332.pdf

317 content conversion table between CMS (expressed in IU and in mg) and colistin base activity 318 (expressed in mg) was introduced to help the prescribers. 319 Colistin is used in human medicine both in the community and hospital sectors, and there is a growing 320 need in specific settings like intensive care units (Ingenbleek et al., 2015) and for treatment of 321 healthcare-associated infections due to carbapenemase-producing Gram-negative bacteria (ECDC, 322 2016). Medical doctors often have to rely on colistin for the treatment of these infections. Alternative 323 antibacterials such as tigecycline, fosfomycin and temocillin also have limitations and are sometimes 324 authorized only in a limited number of countries across EU MSs. Few new antimicrobials for systemic 325 infections with MDR Gram-negative pathogens are expected in the future. Of notice, a new beta (β-326)lactam- β-lactamase inhibitor combination product (ceftazidime-avibactam), which is active against 327 organisms that produce serine-based but not metallo-based carbapenemases, was approved by the 328 Food and Drug Administration of the USA (FDA) in 2015 and received a positive opinion from the CHMP 329 in April 2016. 330 Total consumption (reflecting topical, inhalational and systemic routes of administration combined) 331 varies widely between EU/EEA countries and doubled between 2010 and 2014 (ECDC, 2015) following 332 the rise in MDR Gram-negative pathogens involved in healthcare-associated infections (Skov and 333 Monnet, 2016). **Table 1** shows the distribution of and trends in the consumption of polymyxins (mainly 334 colistin) for systemic use in EU/EEA countries. 335 336

Source: European Centre for Disease Prevention and Control (ECDC): "Summary of the latest data on antibiotic consumption in the European Union, ESAC-Net surveillance data, November 2015" (ECDC, 2015)

Country	2010	2011	2012	2013	:	2014	Trends in consumption of polymyxins, 2010–2014	Average annual change 2010–2014	Statistical significance
Finland (b)	0	0	0	0	0		• • • • •		n.a.
Lithuania (a)			0	0	0		• • • •		n.a.
Norway	0.0002	0.0004	0.0006	0.0006	0.0006		· · · · · · · · · · · · · · · · · · ·	<0.001	significant
Poland (a)					0.001		•		n.a.
Latvia	0	0	0.003	0.002	0.001			<0.001	n.s.
Sweden	0.000	0.001	0.001	0.001	0.001			<0.001	n.s.
Netherland	0.006	0.003	0.002	0.003	0.002		1	-0,001	n.s.
Bulgaria	0	0	0	0	0.002			<0.001	n.s.
Estonia	<0.001	<0.001	0.002	0	0.002			<0.001	n.s.
Denmark	0.002	0.002	0.002	0.001	0.003		~	<0.001	n.s.
Luxembourg	0.005	0.005	0.005	0.006	0.003		-	<0.001	n.s.
Slovenia	0.001	0.002	0.003	0.003	0.005		-	0.001	n.s.
United Kingdom (a)(d)				0.005	0.006				n.a.
Hungary	0.002	0.004	0.005	0.006	0.007			0.001	significant
France	0.008	0.008	0.008	0.008	0.008			<0.001	n.s.
Malta	0.026	0.004	0.002	0.006	0.011		1	0.003	n.s.
EU/EEA	0.008	0.011	0.014	0.012	0.012		-	<0.001	n.s.
Ireland	0.014	0.014	0.015	0.015	0.013			<0.001	n.s.
Portugal (c)	0.013	0.018	0.019	0.020	0.019			0.001	n.s.
Croatia	0.055	0.010	0.029	0.003	0.019		~	0.008	n.s.
Slovakia (a)			0.020	0.023	0.025		مسمر		n.a.
Italy	0.012	0.011	0.019	0.023	0.025		-	0.004	significant
Greece (a)		0.078	0.085	0.084	0.095		مسم		n.a.
Belgium	0.008	0.009	0.006	0.008					n.a.

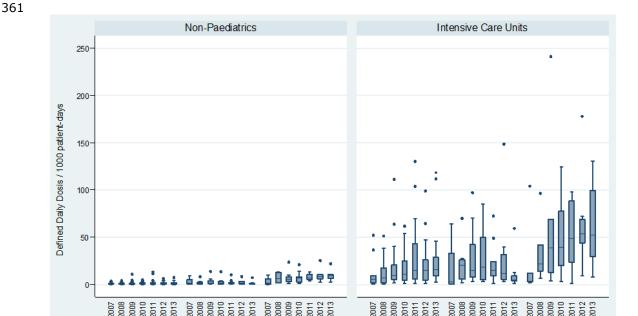
The number for EU/EEA refers to the corresponding population-weighted mean consumption, calculated by summing the products of each country's consumption in DDD per 1 000 inhabitants an per day x country population as in Eurostat, and then dividing this sum by the total EU/EEA population.

- a) These countries did not report data for all years during the period 2010-2014.
- b) Finland: data include consumption in remote primary healthcare centres and nursing homes.
- c) Portugal: data relate to public hospitals only.
- d) United Kingdom: data do not include consumption from UK-Wales (2013) or UK-Northern Ireland (2014).
- n.a.: not applicable; linear regression was not applied due to missing data.
- n.s.: not significant.

 Long-term, detailed surveillance is needed to monitor the evolution at the country level and stratified by speciality. For example in Belgium, the use of colistin has more than doubled in intensive care units according to the latest surveillance data, in particular in university hospitals (**Figure 1**).

Updated advice on the use of colistin products in animals within the European Union: development of resistance and possible impact on human and animal health EMA/231573/2016

Figure 1. Evolution of colistin use (J01XB01) in Belgian acute care hospitals, 2007-2013, stratified by type of care (Primary = general hospitals; Secondary = general hospital with teaching missions; Tertiary = teaching/university hospital), modified from (Ingenbleek et al., 2015).



Evolution is expressed in DDD (defined daily dose) per 1000 patient-days for hospital wide non-paediatrics wards (left) and intensive care units (right). Participation rates exceed on average >85% among 110 acute care hospitals over consecutive years.

Primary

Secondary

Tertiary

Virulent clones of *K. pneumoniae* or other difficult to treat Gram-negative bacteria are becoming resistant during therapy and associated with hospital outbreaks within the EU/EEA and worldwide (Balm et al., 2013; Brink et al., 2013; Comandatore et al., 2013; Del Bono, 2013; Lambrini, 2013; Lesho et al., 2013; Monaco et al., 2014; Onori et al., 2015; Snitkin et al., 2013). Analysis of nosocomial outbreaks with *Acinetobacter baumannii* indicated that prior carbapenem and colistin consumption may have acted as triggering factors for the development of resistance (Agodi et al., 2014; Wright et al., 2016). As outlined below, the *mcr-1* gene has now been shown in different human isolates including invasive pathogens both in hospital and ambulatory care (**Table 9**) (Meletis et al., 2011), and outbreaks due to MDR pathogens expressing the *mcr-1* gene might occur in the near future.

Colistin resistance thus has been emerging rapidly following its reintroduction in human medicine, as shown in different reports, with an associated increased mortality (Capone et al., 2013; Kontopoulou et al., 2010; Zarkotou et al., 2010). In a hospital in Greece, colistin resistance rates rose from 0% in 2007 to 8.1% in 2008 and to 24.3% in 2009 (Meletis et al., 2011). The latest estimates from Italy show a rise of colistin resistance in *K. pneumoniae* from 1 to 2% in 2006 to 33% in 2009 (Monaco et al., 2014). Prior to the discovery of the *mcr-1* gene, a Dutch survey has demonstrated that colistin resistance, shown to be clonal in nature after oral use in the ICU for selective digestive tract decontamination (SDD), can rapidly spread in a hospital and therefore SDD should be discouraged in outbreak settings (Halaby et al., 2013). Since *mcr-1*-producing bacteria already have been isolated from a limited number of human patients (**Table 9**) Poirel et al. (2016) expressed similar concerns and

requested an urgent review of SDD, given the occurrence of horizontally transferable colistin resistance.

3.2. Veterinary medicine

Within the EU MSs, colistin and polymyxin B are authorised nationally. Main indications are infections caused by Enterobacteriaceae in pigs, poultry, cattle, sheep, goats and rabbits. Colistin is also used in laying hens and cattle, sheep and goats producing milk for human consumption. Typically, colistin products are administered orally, in feed, in drinking water, as a drench, or through milk replacer diets. Combinations of colistin with other antimicrobials are available for group treatments of food-producing animals in some EU countries. Products for parenteral and intramammary administration are also available, and Gram-negative infections in ruminants including endotoxaemia are claimed indications. Polymyxin B is on the list of substances essential for the treatment of equidae for systemic treatment for endotoxaemia (antitoxigenic effect, not antibacterial as such) associated with severe colic and other gastrointestinal diseases (Barton et al., 2004; Moore and Barton, 2003; Official Journal of the European Union, 2013). As in human medicine, colistin and polymyxin B have been registered for topical administration to individual veterinary patients. In companion animals, prescription eye and eardrops are available with colistin alone, or in combination with other antimicrobials. Colistin tablets are available for calves for the prevention and treatment of neonatal colibacillosis. In some EU MSs, veterinary medicinal products (VMPs) containing colistin are not on the market, i.e. not commercialised (EMA/ESVAC, 2015).

Colistin products (polymyxin E) have never been marketed for use in animals in the United States (US Food and Drug Administration, 2016). Sources from the FDA have indicated that there is only one polymyxin B product (ophthalmic ointment, combination of polymyxin B and oxytetracycline) approved for use in food-producing species. In recent years, this product has been marketed in 2009 and 2012-2015, although it has been marketed in small quantities. Polymyxin B is also available in the US as a component of approved ophthalmic products (for use in dogs and cats) and otic products (for use in dogs). There is documented legal off label use in other non-food-producing species, such as horses. Sources from the Public Health Agency of Canada have indicated that there are no approved colistin products (polymyxin E) for use in animals in Canada (Public Health Agency of Canada, 2016).

In the EU/EEA, colistin has been used in veterinary medicine since the 1950s (Koyama et al., 1950), primarily for pigs including group treatments and prevention of diarrhoea caused by *E. coli* and *Salmonella* spp., as first choice treatments for neonatal diarrhoea in piglets (Timmerman et al., 2006) and veal calves (Pardon et al., 2012) caused by *E. coli* as well as for the therapy of mild colibacillosis in poultry. The median number of individuals treated with colistin per 1000 animals and per day in Belgium was 41.3 (Callens et al., 2012b) and 58.9 (Pardon et al., 2012) for finishing pigs (50 farms) and for veal calves (15 farms), respectively. Based on the overall antimicrobial consumption, these studies demonstrate that colistin accounted for more than 30% of the antimicrobial use in swine and 15% in veal farming. The Belgian use of colistin was for indications others than those for which it is authorised, e.g. respiratory disease, peritonitis (Pardon et al., 2012) and streptococcal infections (Callens et al., 2012b). Doses varied between animal species, farm types and indications. Timmerman (2006) reported underdosing (sub-dosing) of oral colistin in piglets possibly due to dilution in food or water, since its administration was not weight-based. Studies on dairy farms have shown limited use of polymyxins (Catry et al., 2016; Catry et al., 2007; Menéndez González et al., 2010). In 32 broiler farms in Belgium, the use of colistin was not reported despite detailed antimicrobial

consumption records (Persoons et al., 2012), although colistin has been used in medicated feed

(www.belvetsac.ugent.be). Older studies from 2001-2003 in a limited number of Belgian cattle farms,

have shown that feed (starter rations) with antibiotics were given for 6 to 13 days in all of 5 examined

veal calves farms and 55 % of them contained colistin (Catry et al., 2007). In the same survey and in

433 great contrast, the mean number of suckling beef (n= 5 farms) and dairy cattle (n= 5 farms) that

- received colistin was on average below 0.2 per 1000 animals daily (Catry et al., 2007).
- 435 In 2013, the total sales of polymyxins in the 26 EU/EEA countries reporting data to the ESVAC project,
- including tablets but excluding topical forms, polymyxins were the 5th most sold group of
- antimicrobials (6.1%), after tetracyclines (36.7%), penicillins (24.5%), sulphonamides (9.6%), and
- macrolides (7.4%). Total sales in weight summed up 495 tonnes. Of those 99.7% were for oral forms
- as follows: 43.2% were oral solution (powder for use in drinking water), 42.4% were premix (premixes
- for medicated feeding stuff) and 14.0% were oral powder (powder to be administered with the feed).
- Small amounts were sold as: injectables (0.2%), tablets (0.1%) and intramammaries, intrauterines
- and oral paste (less than 0.0% for each of the three forms). Of the group of polymyxins, colistin
- represented more than 99.9% of the sales. In addition combinations of colistin with other
- antimicrobials are authorised in some MSs. The sales of those combination products represents less
- than 10% of the overall sales of colistin (data not published).
- Some MSs with high consumption of polymyxins have shown a decrease in consumption between 2011
- and 2013, whereas others have shown a stable situation or even an increase (Figure 2). In Belgium,
- 448 polymyxin use showed a 28.1% decrease in 2014. This reduction seen for the second year in a row has
- 449 been attributed due to start of the use of zinc oxide as an alternative for colistin use in the treatment
- 450 of post-weaning diarrhoea in piglets (BelVetSac, 2015). The last ESVAC report shows an overall
- decrease of 19% of sales of polymyxins in 23 countries over the last year (EMA/ESVAC, 2015).
- 452 Colistin is used in aquaculture for the prevention of Gram-negative infections (Xu et al., 2012),
- 453 consumption data are not available separately for this food production sector. In the Danish monitoring
- 454 programme (DANMAP), details on consumption do not refer to the use of colistin in fish (Agersø et al.,
- 455 2012a).

Figure 2. Consumption estimates based upon sales for food-producing animals (including horses) of polymyxins, adjusted for biomass under exposure (in mg/PCU), by country, for 2011-2013 (EMA/ESVAC, 2015). No sales reported in Finland, Iceland and Norway.

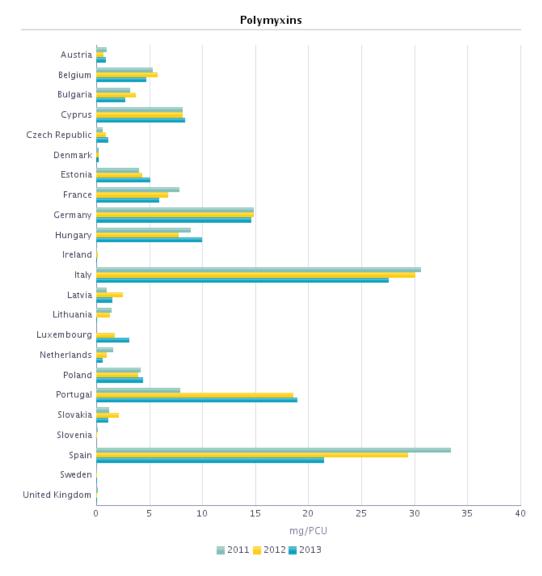
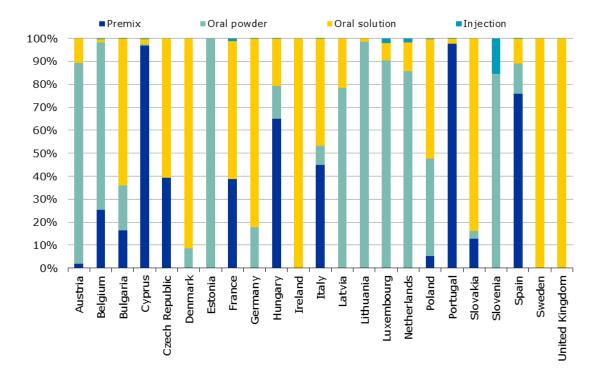


Figure 3 Distribution of veterinary sales for polymyxins by pharmaceutical form, adjusted for biomass under exposure (in mg/PCU), by country for 2013. No sales in Finland, Iceland and Norway. In addition, negligible amounts were sold as bolus, oral paste, intramammaries and/or intrauterine preparations in some countries (EMA/ESVAC, 2015).



Due to concerns that the differences in posology and withdrawal periods established across the EU for veterinary medicinal formulations containing colistin at 2 000 000 IU per ml and intended for administration in drinking water to food-producing species could present a potential serious risk to public and animal health, the United Kingdom referred the matter to the Agency on April 2009, under Article 35 of Directive 2001/82/EC, as amended (EMA/CVMP, 2010). In their opinion the CVMP confirmed that the benefit risk balance remained positive for the use of colistin for treatment of gastrointestinal infections caused by non-invasive *E. coli* susceptible to colistin, when administered at dose of 100 000 IU colistin per kg body weight daily for calves, lambs, pigs and 75 000 IU colistin per kg body weight daily in poultry for 3-5 consecutive days. The risk-benefit balance regarding the use of colistin for treatment of gastrointestinal infections caused by *Salmonella* spp. in calves, lambs, pigs and poultry was considered negative, and those indications were removed from the SPCs of the involved products. The scope of the mentioned referral was limited to veterinary medicinal products containing colistin for administration in drinking water; products administered in feed (or injectables) were not addressed.

Subsequent to the AMEG's previous advice in 2013, a further referral was concluded under Article 35 of Directive 2001/82/EC for all VMPs containing colistin as a sole substance administered orally (including premixes) to food-producing animals (EMA/CVMP, 2015).

In December 2014 the CVMP recommended to restrict the indications for use of colistin to treatment of enteric infections caused by susceptible non-invasive *E. coli* only, that any indications for prophylactic use should be removed and the treatment duration should be limited to the minimum time necessary

- for the treatment of the disease and not exceeding 7 days. In addition, it was recommended to remove
- 490 horses from the SmPCs on the grounds of target species safety concerns.
- 491 In April 2016 the CVMP recommended the withdrawal of the marketing authorisations for all veterinary
- 492 medicinal products containing colistin in combination with other antimicrobial substances.

3.3. Antibacterial effect

- The bactericidal effect of colistin is the result of an electrostatic interaction with divalent cations of the
- 495 outer bacterial membrane, which causes a disruption of the cell structure, leakage of the cell contents
- and thereby cell lysis (Lim et al., 2010; Schindler and Osborn, 1979). The broad-spectrum of activity
- 497 of polymyxins against Gram-negative bacteria involves binding to lipid A, the anchor for
- 498 lipopolysaccharide, and the main constituent of the outer membrane of these bacteria. Time kinetic-kill
- 499 in vitro studies have shown a concentration-dependent bactericidal action (Guyonnet et al., 2010).
- 500 Polymyxins are produced naturally by Bacillus (Paenibacillus) polymyxa. Polymyxins are particularly
- active against a wide range of species of Gram-negative bacilli (e.g. E. coli, Salmonella spp. and P.
- 502 aeruginosa) including those displaying carbapenem resistance, and certain Mycobacterium species.
- 503 Colistin differs from polymyxin B, only by one amino acid in position 6 (D-leucine in colistin,
- 504 phenylalanine in polymyxin B). Both compounds have the same mechanism of action and resistance
- development. Polymyxin B and colistin (sulphate) have a similar spectrum of antibacterial activity
- against main Gram-negative pathogens (Gales et al., 2011).
- 507 Polymyxins have no clinically useful activity against Gram-positive bacteria, Gram-negative cocci,
- anaerobes and Mollicutes including Mycoplasma spp. (Falagas and Kasiakou, 2005). In addition, colistin
- 509 lacks therapeutic activity against intrinsically (inherently) resistant species, including bacteria of the
- 510 genera Serratia, Stenotrophomonas, and Proteus (Poque et al., 2011).
- 511 Colistin heteroresistance, (i.e. cultures where both susceptible and resistant subpopulations are
- 512 present), has been reported for K. pneumoniae (Poudyal et al., 2008), P. aeruginosa (Bergen et al.,
- 513 2011), A. baumannii and E. cloacae (Hawley et al., 2008; Lo-Ten-Foe et al., 2007). The potential for
- under-dosing in relation to selecting subpopulations with higher MICs, during treatment with colistin
- 515 has been illustrated for A. baumannii (David and Gill, 2008). The use of combination therapy would
- 516 have the potential benefit to reduce the emergence of such subpopulations. Studies that included a
- 517 moth (Galleria mellonella) infection model have found that vancomycin and doripenem might have a
- 518 synergistic effect together with colistin in A. baumanni strains with decreased colistin susceptibility
- 519 (O'Hara et al., 2013). For *P. aeruginosa*, synergistic effects have been shown *in vitro* between colistin
- 520 and many other compounds (e.g. rifampicin and the anti-pseudomonal agents azlocillin, piperacillin,
- aztreonam, ceftazidime, imipenem, doripenem, or ciprofloxacin) (Conway et al., 1997).
- 522 Recent studies have demonstrated that colistin is synergistic with drugs of the echinocandin family
- against *Candida* species, by increasing permeabilisation and attack by colistin on fungal membranes
- 524 (Zeidler et al., 2013).
- The pharmacokinetic/pharmacodynamic (PK/PD) approach has been applied successfully to the
- 526 selection of dose regimens for new antibacterial agents and the re-evaluation of efficacious dose
- 527 regimens for several antimicrobial classes. PK/PD has some potential to identify regimens that may
- 528 minimise selection pressure for resistant strains. Although the vast majority have focused on the
- 529 prevention of mutational resistance (Drlica and Zhao, 2007), some studies have shown a benefit for
- 530 the containment of bacteria in which resistance is mediated mainly by horizontal gene transfer
- (McKinnon et al., 2008). The application of PK/PD for colistin has only recently re-gained attention due

- 532 to its increasing systemic use to treat multidrug-resistant bacteria causing human infections. The
- PK/PD parameter to maximise bactericidal activity and minimise resistance has been shown as the
- area under the inhibitory curve (AUIC, or fAUC/MIC) for target organisms such as P. aeruginosa and
- 535 Acinetobacter spp. (Michalopoulos and Falagas, 2011). In veterinary medicine, similar estimates have
- been found to be reliable for preclinical studies for colibacillosis in piglets (Guyonnet et al., 2010). It is,
- 537 however, unlikely that the diversity of gut microbiota and their intrinsic difference in antibiotic
- 538 susceptibilities will ever allow a PK/PD approach to be sustainable in limiting the spread of
- 539 (multi)resistance in non-target bacteria. Some subpopulations among wild type strains (e.g. 3 % of
- wild type P. aeruginosa strains) have a slightly increased MIC (4 μ g/ml) and thereby jeopardising safe
- 541 PK/PD targeting if such bacteria are clinically involved (Skov Robert, personal communication).

4. Resistance mechanisms and susceptibility testing

4.1. Resistance mechanisms

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- 544 Acquired resistance to colistin in normally susceptible bacteria has for long been characterised by
- 545 chromosomal mutations and thus in theory was non-transferable by mobile genetic elements (Callens
- 546 et al., 2012b; Landman et al., 2008; Olaitan et al., 2014).
- 547 Chromosomal polymyxin resistance is mediated by mutations in specific regions (pmrA/B and
- phoP/Q)(Moskowitz et al., 2012). Resistance is then associated with changes in the target components
- of the Gram-negative bacterial wall, namely a covalent addition of 4-amino-L-arabinose (LAra4N) to
- 550 phosphate groups within the lipid A and oligosaccharide as elements from the lipopolysaccharide (LPS)
- (Boll et al., 1994; Moskowitz et al., 2012; Moskowitz et al., 2004; Nummila et al., 1995). The two-
- 552 component regulatory ParR-ParS system with an identical modification of LPS is involved in the
- adaptive resistance at sub-inhibitory concentrations of cationic peptides, including colistin and the
- bovine peptide, indolicidin (Fernandez et al., 2010). Research has demonstrated that the activity of
- lysozyme and other innate immune defence peptides (LL37) can be affected (Napier et al., 2013).
- 556 Colistin resistance thus confers resistance to polymyxins and a range of other cationic peptides.
- 557 Decreased activity of polymyxins is due to structural LPS changes at both the cytosol and peri-
- 558 plasmatic site of the cell membrane (Moskowitz et al., 2012). Studies indicate a similar (temperature
- dependent) mechanism in other bacteria including A. baumannii, Yersinia enterocolitica and Salmonella
- spp. (Beceiro et al., 2011a; Beceiro et al., 2011b; Guo et al., 1997; Reines et al., 2012). They found
- that the development of a moderate level of colistin resistance in A. baumannii requires distinct genetic
- events, including (i) at least one point mutation in pmrB, (ii) up-regulation of pmrAB, and (iii)
- expression of pmrC, which leads to the addition of phosphoethanolamine to lipid A (Beceiro et al.,
- 564 2011a). The phoP/Q system has been shown to be involved in strains with intrinsic resistance, for
- example pathogenic *Edwardsiella tarda* from fish (Lv et al., 2012) and *Klebsiella pneumoniae* (Wright
- et al., 2015). These systems are different from the mechanisms of colistin resistance in laboratory and
- 567 clinical strains of A. baumannii as described by (Moffatt et al., 2010), whom noted unexpectedly -
- 568 the total loss of LPS production via inactivation of the biosynthesis pathway genes *lpxA*, *lpxC*, or *lpxD*.
- In Yersinia spp., polymyxin resistance can be related to the existence of efflux pumps with potassium
- anti-porter systems (RosA/RosB) (Bengoechea and Skurnik, 2000). In K. pneumoniae mutations in
- 571 crrAB, present in many multidrug resistant virulent strains (ST258, see below), a histidine kinase gene
- as part of a two-component regulatory system (TCRS), have been found involved in decreased colistin
- 573 susceptibility (Wright et al., 2015).

Colistin-resistant mutants of E. coli, K. pneumoniae, Acinetobacter baumannii and Pseudomonas aeruginosa can be selected in vitro from cultures progressively grown in medium containing 0.5 to $16 \mu g/ml$ colistin (Lee et al., 2016). With the exception of some well-examined clinical strains (K. pneumoniae), many of the above mutation mechanisms are not stable after several passages in vitro (Moskowitz et al., 2012). This instability of polymyxin resistance by mutation, has been for long and prior to the mcr-1 discovery, stated to reduce the risk of rapid spread of resistance to colistin (Gentry, 1991; Landman et al., 2008). Investigations on consecutive samples of Acinetobacter baumannii from nosocomial infections have indicated that this in vitro instability of colistin resistance is also found in vivo during colistin therapy (Lesho et al., 2013; Snitkin et al., 2013; Yoon, 2013). Out of 37 patients treated with colistin for less than one to three months, in five patients (13%) mutations in the pmr locus were found. Colistin susceptibilities returned soon after cessation of colistin therapy (Snitkin et al., 2013), but in one of the isolates an apparently more stable mutation was found (pmrB^{L271R}). Of note is that this strain's gradient diffusion (E-test) and microbroth dilution susceptibility tests were highly discordant (Snitkin et al., 2013).

Proteomic analysis by Chua and colleagues have shown that low intracellular c-di-GMP concentrations in bacteria (i.e. a secondary messenger required for adaptations in life style of bacteria) are associated with polymyxin resistance. Biofilm formation by bacteria, which has long been regarded as leading to decreased susceptibility to antimicrobials, is systematically down-regulated at low intracellular c-di-GMP concentrations (Chua et al., 2013). Biofilms are protective layers around bacteria that are formed, for example, around inert invasive devices (e.g. implants) or in the digestive tract as mucosal biofilm communities (Fite et al., 2013). Whereas for many antimicrobial agents, resistance transfer is enhanced under biofilm conditions, this down-regulation of c-di-GMP might explain why this is not applicable for colistin resistance. In other words, colistin resistance, and maybe by extension colistin presence, might interfere with biofilm formation and therefore resistance transfer. To what extent conjugal deficiency and down-regulation of biofilm formation are related within the occurrence of colistin resistance, is not documented. An exhaustive update on chromosomal colistin resistance mechanisms (vertical transmissible) was done by Olaitan et al. (2014).

In the 1980's, work on *Klebsiella pneumoniae* did indicate that colistin-resistant mutants counteract horizontal gene transfer from multi-resistance gene clusters (Lamousin-White and O'Callaghan, 1986). This "conjugal deficiency" of colistin-resistant strains was found to be 1000-fold compared to colistin-susceptible strains under laboratory conditions. No later reports have confirmed these findings and underlying mechanisms. This aspect of colistin-resistant isolates has been nevertheless at that time exploited successfully under clinical circumstances. Although stepwise mutational resistance has appeared following prolonged colistin use in certain hospital outbreaks, because plasmids were not present in the epidemic strains, the colistin-resistant isolates remained susceptible to other antibiotics. Through the rotational use of colistin and aminoglycosides, the prevalence of resistant *Klebsiella* spp. decreased during the latter outbreaks (O'Callaghan et al., 1978). More recently genomic analysis have suggested a possible fitness cost due to colistin resistant mutations with loss of β -lactamase-encoding plasmids (Wright et al., 2016). Whereas some mcr-1 harbouring plasmids do not show so far identified resistance genes (Suzuki et al., 2016), many E. coli harbour β -lactamases together with mcr-1 (**Table 9**) including decreased susceptibility for carbapenems as well as resistance determinants for other antimicrobial classes (Poirel et al., 2016).

In November 2015, Liu et al. (2015) reported that a transferable plasmid-mediated colistin resistance gene, *mcr-1*, had been found in *E. coli* isolates from animals, food and bloodstream infections from human patients in China. Subsequent retrospective analysis of strain collections showed the *mcr-1* gene was already circulating in the 1980's (Shen et al., 2016) and the EU/EEA in a variety but low

- absolute number of Gram-negative organisms (Doumith et al., 2016). Although the exact mechanism
- 621 is under examination, the mcr-1 gene encodes a membrane-anchored phosphoethanolamine
- 622 transferase that likely confers resistance to colistin by a modifying lipid A (Thanh et al., 2016). The
- 623 mcr-1 gene is often associated with transposable elements located on different types of plasmids
- 624 (pHNSHP45, IncI2, IncX4, IncHI2 and IncP2...). (Liu et al., 2015; Thanh et al., 2016; Zeng et al.,
- 2016). These plasmids have been shown to have high in vitro transfer rates (10^{-1} to 10^{-2}) or absent,
- depending on the conditions and strains involved. Conjugation has been shown from E. coli and
- 627 Salmonella spp. into other Enterobacteriaceae, not only K. pneumoniae, Enterobacter aerogenes and
- 628 Enterobacter spp. but also P. aeruginosa. (Callens et al., 2016; Quesada et al., 2016; Zeng et al.,
- 2016). Linked resistance genes have been shown in many isolates (**Table 9**). The MIC observed in
- 630 strains carrying mcr-1 has ranged from 0.5 to 32 mg/l and is stated to be associated with the diversity
- of lipid A structures found in Enterobacteriaceae (Thanh et al., 2016). The mcr-1 positive E. coli
- 632 strains can have other colistin resistance genes due to mutations in chromosomal DNA present
- 633 (PmrA/B), and of notice these strains failed to transfer the mcr-1 gene in conjugation mating
- 634 experiments (Quesada et al., 2016). The occurrence of the mcr-1 gene in E. coli and also across
- different Salmonella serovars has been recently confirmed in different EU MSs like Belgium
- 636 (Botteldoorn, 2016 (in press)), Spain (Quesada et al., 2016), the Netherlands (Veldman, 2016), and
- France (Perrin-Guyomard et al., 2016) with special relevance for turkeys.

4.2. Susceptibility testing

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4.2.1. Methodological approaches

- Susceptibility testing of colistin is performed by testing colistin sulphate since the prodrug CMS is
- completely inactive as shown by Bergen et al. (2006) and all its activity seen in vitro simply would
- derive from partial conversion of CMS to colistin over time. In the last couple of years there has been
- intensive research under the auspices of European Committee on Antimicrobial Susceptibility Testing
- 644 (EUCAST) and Clinical and Laboratory Standards Institute (CLSI) to delineate methods that could
- 645 produce reliable and reproducible susceptibility results. Presently only broth dilution can be
- recommended for susceptibility testing, i.e. for the time being neither disk diffusion, agar dilution nor
- 647 gradient test should be used for testing of colistin. Broth microdilution (BMD) should be performed
- using uncoated polystyrene microtiter plates; cation adjusted Mueller-Hinton broth without any other
- 649 additives (in particular no polysorbate 80 or other surfactants) (EUCAST homepage www.eucast.org)
- The EUCAST clinical breakpoints for Enterobacteriaceae (E. coli and Klebsiella spp., but excluding
- 651 Proteus spp., Morganella morganii, Providencia spp., and Serratia spp.), P. aeruginosa, and A.
- 652 baumannii are ≤2 μg/ml for a colistin susceptible isolate; and >2 μg/ml for a colistin resistant isolate
- 653 (EUCAST, 2013). For non-clinical surveillance purposes, the epidemiological cut-off value (ECOFF) can
- be difficult to determine given certain Salmonella serovars, such as Dublin and Enteriditis demonstrate
- 655 subpopulations that are (intrinsically) slightly-less susceptible (Agersø et al., 2012b).
- A number of new techniques for susceptibility testing and identification of resistance determinants
- have been developed (Jung et al., 2014; Review on antimicrobial resistance (conference), 2015; van
- Belkum and Dunne, 2013). These techniques reduce the antimicrobial susceptibility testing time from
- two to four days to approximately one to two hours, which could reduce the empirical treatment and
- 660 stimulate appropriate antimicrobial use. The utility of colistin resistance determinations has recently
- been demonstrated for E. coli (Liu et al., 2016), with a method called SERS-AST (simple surface-
- 662 enhanced Raman antimicrobial susceptibility testing).

- 663 For the interpretation of **Table 9**, it is of importance to stress that in the absence of research into the
- specificity and sensitivity of the mcr-1 PCR (test characteristics identifying false positive/negative
- results), and estimation of the true (absolute prevalence) prevalence is difficult. In particular only
- isolates with elevated MICs according to the latest EUCAST/CLSI recommendations might have been
- 667 included.

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4.2.2. Monitoring results

4.2.2.1. Occurrence of microbiological resistance to colistin

- A summary of an extraction of all available phenotypic data on colistin resistance from the "European
- Union summary report on antimicrobial resistance in zoonotic and indicator bacteria from humans,
- animals and food in 2014" (EFSA, 2016) is given here:
- Twenty fourteen was the first year of mandatory EU monitoring for colistin resistance in Salmonella
- and indicator E. coli from animals. Although some MSs encountered technical difficulties in accurately
- determining colistin susceptibility, the monitoring data obtained are being considered to a baseline in
- 676 poultry (animal species targeted for 2014) against which future changes can be measured. The
- 677 reported occurrence of colistin resistance is unlikely to equate directly to the occurrence of mcr-1 gene,
- 678 because a number of different resistance mechanisms can confer colistin resistance as indicated in a
- 679 previous section of this report. In the case of Salmonella, data were reported and is presented for
- 680 broilers, layers, fattening turkeys, meat from broilers and meat from turkeys. For E. coli data were
- reported and is only available for broilers and fattening turkeys. The ECOFF value applied for the
- analysis of the occurrence of 'microbiological' resistance to colistin in both Salmonella and E. coli was
- 683 >2 mg/l.
- 684 EU harmonised monitoring data indicated that 0.9% of E. coli from broilers (total tested equal to 4037,
- 685 colistin-resistance found in 24 MSs) and 7.4% of E. coli from fattening turkeys (total tested equal to
- 686 1663, colistin-resistance found in 11 MSs) were colistin-resistant according to the interpretative criteria
- 687 applied.
- In the case of Salmonella spp., 8.3% of isolates from broilers (total tested=1683, colistin-resistance
- 689 found in 10 MSs), 2% of isolates from fattening turkeys (total tested=757, colistin-resistance found in
- 690 6 MS), 14.1% of isolates from laying hens (total tested=822, colistin-resistance found in 13 MS),
- 691 24.7% of isolates from turkey meat (total tested equal to 279, colistin-resistance found in 2 MS), and
- 4.4% of isolates from broiler meat (total tested equal to 911, colistin-resistance found in nine MSs)
- 693 were colistin-resistant according to the interpretative criteria applied. Resistance was detected in a
- 694 diversity of Salmonella serovars, although a large proportion of the colistin-resistant Salmonella from
- broilers and laying hens were S. Enteritidis. There are studies showing that the distribution of the wild
- type differs between serovars. A general epidemiological cut off value (ECOFF) therefore can lead to
- 697 false positive resistance interpretation for some serovars or subpopulations herein (Agersø et al.,
- 698 2012b).

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4.2.2.2. Multidrug resistance in colistin resistant isolates

- Data on multidrug resistance in *E. coli* isolates from poultry populations and meat thereof, reported in
- 701 the EU from harmonised surveillance as resistant to colistin are presented in **Table 2**. In this analysis
- 702 we included the *E. coli* spp. isolates originating from laying hens, broilers, and fattening turkeys flocks;
- 703 and isolates from broilers and turkey meat, for which antimicrobial resistance (AMR) data to the
- following 10 antimicrobials were reported: ampicillin (AMP), cefotaxime (CTX), ceftazidime (CAZ),

705 nalidixic acid (NAL), ciprofloxacin (CIP), tetracycline (TET), gentamicin (GEN), trimethoprim (TMP), 706 sulphonamide (SUL), chloramphenicol (CHL), meropenem (MERO) and colistin. For the purpose of this 707 analysis, resistance to CIP/NAL and CTX/CAZ have been addressed together. Data on 'microbiological' 708

and 'clinical' co-resistance to colistin and in addition to critically important antimicrobials (CIP and/or

709 CTX) in E. coli from poultry populations and meat thereof are presented in Table 3 and Table 4.

710 Data on multidrug resistance, in Salmonella isolates from poultry populations and meat thereof, 711 reported in the EU as resistant to colistin are presented in

712 Table 5. Data on 'microbiological' and 'clinical' co-resistance to colistin and in addition to critically 713 important antimicrobials (CIP and/or CTX) in Salmonella spp. from poultry populations and meat 714 thereof are presented in Table 6 and Table 7.

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Table 2. Percentage of MDR isolates in E. coli from poultry populations and meat thereof, reported as resistant to colistin

N	Res. colistin	Res 0	Res 1	Res 2	Res 3	Res 4	Res 5	Res 6	Res 7	Res 8	Res 9
6259	162	2	2	10	18	21	42	52	14	1	0
100%	2.6%	1.2%	1.2%	6.2%	11.1%	13.0%	25.9%	32.1%	8.6%	0.6%	0%

N: total number of E. coli spp. isolates from poultry origin and meat derived thereof tested against 9 classes of antimicrobials; Res0: number (%) of isolates resistant to colistin only and to none of the 9 additional antimicrobial classes. Res1-Res9: number (%) of isolates resistant to colistin being also resistant to one antimicrobial class/resistance to nine antimicrobial classes.

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Table 3. 'Microbiological' co-resistance to colistin and CIP and/or CTX in E. coli from poultry populations and meat thereof - resistance assessed against ECOFFs (COL: MIC >2 mg/l, CIP:

725 MIC > 0.064 mg/l, CTX: MIC > 0.25 mg/l)

N	Res. colistin	Not Res. to CIP nor CTX	Res. to CIP or CTX	Res. to both CIP and CTX
6259	162 (2.6%)	33 (20.4%)	120 (74.1%)	9 (5.6%)

N: total number of *E. coli* spp. isolates from poultry origin and meat derived thereof tested against 9 antimicrobial classes.

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729 Table 4. 'Clinical' co-resistance to colistin and CIP and/or CTX in E. coli from poultry populations and 730 meat thereof - resistance assessed against CBPs (COL: MIC >2 mg/l, CIP: MIC >1 mg/l, CTX: 731 MIC > 2 mg/l

N	Res. colistin	Not Res. to CIP nor CTX	Res. to CIP or CTX	Res. to both CIP and CTX
6259	162 (2.6%)	87 (53.7%)	73 (45.1%)	2 (1.2%)

732 N: total number of *E. coli* spp. isolates from poultry origin and meat derived thereof tested against 9 antimicrobial classes. 733

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Table 5. Percentage of multidrug-resistant (MDR) isolates in Salmonella spp. from poultry populations and meat thereof, reported as resistant to colistin

737 In this analysis we included the Salmonella spp. isolates originating from laying hens, broilers, and

fattening turkeys flocks; and isolates from broilers and turkey meat, for which antimicrobial resistance

data to the following 10 antimicrobials were reported: AMP, CTX, CAZ, NAL, CIP, TET, GEN, TMP, SUL,

CHL, MERO and colistin. For the purpose of this analysis, resistance to CIP/NAL and CTX/CAZ have

741 been addressed together.

N	Res. colistin	Res0	Res1	Res 2	Res 3	Res 4	Res 5	Res 6	Res 7	Res 8	Res 9
4432	377	236	101	5	12	13	8	2	0	0	0
100%	8.5%	62.6%	26.8%	1.3%	3.2%	3.5%	2.1%	0.5%	0%	0%	0%

N: total number of *Salmonella* spp. isolates from poultry origin and meat derived thereof tested against 9 classes of antimicrobials; Res0: number (%) of isolates resistant to colistin only and to none of the 9 additional antimicrobial classes. Res1-Res9: number (%) of isolates resistant to colistin being also resistant to one antimicrobial class/resistance to nine antimicrobial classes.

Table 6. 'Microbiological' co-resistance to colistin and CIP and/or CTX in *Salmonella* spp. from poultry populations and meat thereof - resistance assessed against ECOFFs (COL: MIC >2 mg/l, CIP: MIC >0.064 mg/l, CTX: MIC >0.5 mg/l)

N	Res. colistin	Not Res. to CIP nor CTX	Res. to CIP or CTX	Res. to both CIP and CTX
4432	377 (8.5%)	309 (82.0%)	67 (17.8%)	1 (0.3%)

N: total number of *Salmonella* spp. isolates from poultry origin and meat derived thereof tested against 9 antimicrobial classes.

Table 7. 'Clinical' co-resistance to colistin and CIP and/or CTX in *Salmonella* spp. from poultry populations and meat thereof - resistance assessed against CBPs (COL: MIC >2 mg/l, CIP: MIC >1 mg/l, CTX: MIC >2 mg/l)

N	Res. colistin	Not Res. to CIP nor CTX	Res. to CIP or CTX	Res. to both CIP and CTX
4432	377 (8.5%)	373 (98.9%)	4 (1.1%)	0 (0%)

N: total number of *Salmonella* spp. isolates from poultry origin and meat derived thereof tested against 9 antimicrobial classes.

5. Possible links between the use of polymyxins and other antimicrobials in animals and resistance in bacteria of animal origin

Despite the abundant use of colistin in veterinary medicine for over 50 years, a retrospective analysis of bacterial collections showed that transmission of colistin resistance in Gram-negative bacteria *via* horizontal gene transfer or sustained clonal expansion has not been substantial in the EU/EEA. Following the first Asian reports, confirmation of the *mcr-1* gene in large databases in UK (Doumith et al., 2016) among 15 out of 24,000 isolates of *Salmonella* species, *E. coli*, *Klebsiella spp. Enterobacter* spp. and *Campylobacter* spp. from food and human isolates from between 2012 and 2015 has been done, while the number of reports is ever growing in the EU/EEA and worldwide (**Table 9**). In the latest reports,

- 770 mcr-1-postive isolates from clinical specimens so far remain uncommon (Cannatelli et al., 2016). To
- date the earliest animal isolates were in the 1980s in China and were from poultry (Shen et al., 2016);
- the earliest human isolate was a Shigella sonnei strain in 2008 from Vietnam (Skov and Monnet, 2016;
- 773 Thanh et al., 2016). More research is needed because of the diversity of plasmids and occurrences of
- the *mcr-1* gene in different ecosystems including surface water (**Table 9**).
- 775 The larger abundance in veterinary isolates compared to human cases, together with the by far
- 776 exceeding quantities of colistin use in livestock (ECDC/EFSA/EMA, 2015) has been considered
- 777 suggestive of a flow from animals to humans (Skov and Monnet, 2016). Nordmann & Poirel (2016)
- 778 recently have listed further arguments for this rationale aside from the difference in colistin use and
- 779 resistance prevalence. First, the occurrence of isolates with simultaneous resistance for florfenicol
- 780 which is only authorised for used in animals (Poirel et al., 2016), and the co-presence of extended-
- 781 spectrum β -lactamases typical of animal origin, CMY-2 (Falgenhauer et al., 2016). Homologies in the
- genetic organisation of *mcr-1* with insertion sequences in an important ubiquitous animal pathogen
- 783 Pasteurella multocida (Poirel et al., 2016). Given that the mcr-1 gene is present in isolates that often
- 784 harbour other resistance determinants like those encoding β-lactamase production (**Table 9**),
- co-selection of these isolates by other antimicrobials than polymyxins should be considered. A review
- of antimicrobial consumption in livestock at large is therefore provided in the next paragraphs.
- Low antimicrobial consumption is found in dairy and beef cattle that have regular access to pasture.
- 788 Under these conditions, 5-10 animals are treated on average with a standard antimicrobial dose per
- 789 1000 animals (equal to treatment incidence; TI), for colistin the TI was found to be lower than
- 790 0.2/1000 (Catry et al., 2007). For grazing animals, resistance in E. coli is low for most antimicrobials,
- but multi-resistance is encroaching slowly over consecutive years (Geenen et al.; MARAN, 2012).
- 792 In veal calves in central Europe, the average overall TI with antimicrobials was calculated to be
- 793 417 per 1000 animals per day (Pardon et al., 2012), and for colistin this daily incidence is
- 794 approximately 60 per 1000. The evolution of multi-drug resistance is worrisome in veal calves
- 795 (MARAN, 2012), yet colistin resistance in this production system has historically been extremely low to
- absent (Di Labio et al., 2007). Latest findings have however demonstrated the presence of *mcr-1* in
- 797 clinical isolates from veal (Haenni et al., 2016; Malhotra-Kumar et al., 2016a). The latest figures from
- 798 Belgium show a gradual decrease in colistin resistance in *E. coli* from veal calves, from 14.7% in 2011
- 799 to 6.7% in 2014 (CODA-CERVA, 2015).
- 800 In Belgium, the second highest antimicrobial-consuming livestock production system is that of
- fattening pigs, where on average over 200 to 250 per 1000 individuals are treated daily with
- antimicrobials (Callens et al., 2012b). Up to 30% of oral prophylactic and metaphylactic group
- treatments consist of colistin (Callens et al., 2012b). If appropriate testing is applied, resistance is only
- recent, but increasingly (10% in Belgium) being reported among porcine pathogenic *E. coli* strains
- 805 (Boyen et al., 2010). With the exception of a very slight increase in 2013, colistin resistance is
- considered very low in *E. coli* from Belgian pigs over the period 2011-2014 (CODA-CERVA, 2015).
- Dutch, porcine *E. coli* and *Salmonella* isolates, as reported in 2009 (MARAN, 2009), remain fully
- 808 susceptible.
- 809 Large studies combining consumption and resistance are limited, because colistin susceptibility tests as
- routinely performed are not fully reliable or available. A large surveillance study in Polish livestock
- revealed 0.9% of *E. coli* (n=1728) to be resistant to colistin for the period 2011-2012 (Wasyl et al.,
- 812 2013). In central European broilers, approximately 95 to 130 animals were reported to be treated daily
- with a standard antimicrobial dose per 1000 individuals (MARAN, 2009; Persoons et al., 2012).
- Quantification of broiler consumption did not identify use of colistin in 50 randomly selected farms in

- 815 Belgium (Persoons et al., 2012), but it is used in many other EU MSs. The Dutch MARAN report
- covering 2009 showed a decrease in the use of intestinal anti-infectives (including colistin and
- neomycin) in broilers from 26.0 to 18.4 daily dosages per 1000 animals (conversion from daily
- 818 dosages per animal year).
- 819 Colistin resistance in *E. coli* from broilers is increasingly becoming associated with multi-resistance
- 820 (Geenen et al., 2011). Nevertheless reports of colistin resistance remain scarce and limited to some
- broiler meat samples (2.1%, N=328) (MARAN, 2009) and more recently turkey (4.5%) (MARAN,
- 822 2015). A retrospective study from the Netherlands demonstrated a presence of 10% mcr-1 in E. coli
- from turkey meat (Veldman, 2016). In Italy, Battisti and coworkers found a high prevalence while
- 824 screening turkey isolates (E. coli, Salmonella from monitoring). In the non-selective monitoring,
- 825 prevalence of mcr-1 in E. coli from fattening turkeys was 22%, and in isolates from ESBL-screening
- 826 25% (Battisti, 2016b). A recent report from Germany has revealed that, in particular, turkey and
- 827 turkey-derived food (6-18%) frequently contained colistin-resistant E. coli compared to broilers and
- broiler derived food (2-8%) (Alt et al., 2015). Care should be taken that technical difficulties can result
- 829 in over-reporting of colistin resistance, in particular for Salmonella spp. when contaminated with
- 830 inherent resistant organisms such as Proteus species. Studies on antimicrobial consumption and
- 831 further processed in the production chain of turkeys should be done in the future to investigate the
- reasons for the relative high prevalence of colistin resistance, particularly in turkey and meat thereof
- 833 compared with other production types.
- 834 In Australian Aeromonas strains from fish have frequently been found to have decreased susceptibility
- to colistin (55.5%), especially when retrieved from clinical cases (Aravena-Roman et al., 2012),
- although this might be intrinsically present. Studies under EU/EEA aquaculture conditions are not
- 837 available.
- 838 Surveillance data until 2014 show low levels of colistin resistance despite considerable colistin use
- 839 especially in veal and fattening pigs (Callens et al., 2012a) with even a decrease or low steady state
- during the last couple of years in Belgium (Hanon et al., 2015), and Sweden (Swedres-Svarm, 2014).
- Detailed accurate monitoring is needed in these confined production systems to follow up the
- 842 emergence of clonally resistant strains and to demonstrate absence of multi-resistance plasmids or
- alternative structures that include efficient spreading mechanisms for polymyxin resistance. In China
- (Shen et al., 2016) and Taiwan (Kuo et al., 2016), and France (Perrin-Guyomard et al., 2016) the
- occurrence of mcr-1 from food-producing animals shows an increase of colistin resistance during the
- most recent years which might be of importance for prediction of potential for the further global spread
- 847 (Grami et al., 2016).
- The Netherlands (SDa, 2015) and Belgium (BelVetSac, 2015) have set and attained targets to reduce
- the consumption of antimicrobials in veterinary medicine over a limited number of years. In the
- 850 Netherlands for instance, a 58% (50% in fattening pigs) has been demonstrated over the period from
- 851 2009 to 2014. Along, a decrease of overall resistance in faecal bacteria has been found in E. coli in
- 852 livestock in the Netherlands (MARAN, 2015). In Belgium, after two consecutive years of substantial
- reduction in consumption adjusted for kg biomass in 2012 (-6.9%) and 2013 (-6.3%), disappointing
- results were found for 2014 (+1.1%) (BelVetSac, 2015). A decrease in resistance in indicator *E. coli*
- 855 from different Belgian livestock species has also been found (CODA-CERVA, 2015).
- An increase in Chinese livestock production (broilers, i.e. chicken raised for meat, and swine) by nearly
- 857 5% in upcoming years (2016-2020) is anticipated as is a subsequent increase in colistin use (Liu et al.,
- 858 2015). Doses given for growth promotion outside the EU/EEA can be several times lower than the
- doses given for metaphylaxis and curative purposes to EU/EEA livestock, and subsequent concerns for

a different selection pressure of mcr-1 have been raised (Richez and Burch, 2016). A large retrospective analysis showed the presence of this gene in the early 1980's in China, and rather quickly after the use of colistin in animal production (Shen et al., 2016). In the EU/EEA details on the chronology and occurrence of mcr-1 in animals and ways of administrations are lacking to investigate to what extent differences in selection pressure have an impact on the occurrence and spread of the mcr-1 gene. From the retrospective analysis of databanks worldwide so far (Table 9), it is clear that transferable colistin resistance was out there but only "detected" within weeks, and highest prevalence have been demonstrated only in the most recent years of interests. Based upon the prevalence of colistin resistance and mcr-1 in turkey or turkey meat in particular (Battisti, 2016b; Perrin-Guyomard et al., 2016; Veldman, 2016), e.g. from 0 in 2007 to 6% in 2014 in French turkey isolates, detailed investigations in this livestock production sector on colistin consumption and antimicrobials at large are lacking to demonstrated associations with these findings.

6. Impact of use of colistin in food-producing animals for animal and human health

Colistin is now regarded as a last line defence against infections caused by MDR Gram-negative bacteria such as *K. pneumoniae* and *A. baumannii*. Its clinical use has resurged in many parts of the world despite the limitations posed by its toxicity profile. The use of colistin in combination is more frequently considered and clinical studies are on-going. Human nosocomial infections with colistin-resistant strains, particularly with carbapenem resistant *K. pneumoniae*, with high mortality have been reported (Capone et al., 2013; Kontopoulou et al., 2010; Zarkotou et al., 2010). The only independent risk factor demonstrated for colistin-resistant, carbapenemase-producing Enterobacteriaceae (CPE) in matched, controlled studies, is the use of colistin itself (Brink et al., 2013; Halaby et al., 2013).

Often encountered in the EU/EEA is K. pneumoniae sequence types (ST) 258, resistant to all beta (β)-lactams, cephalosporins, carbapenems (KPC/class A; non-metallo), fluoroquinolones, macrolides, aminoglycosides, tigecycline, and colistin (Comandatore et al., 2013; Dhar et al., 2016). This colistin-resistant variant of ST258 is circulating widely in Greece, with clinical cases also seen, possibly via importation, in Hungary, the UK (Livermore, 2012) and USA (Bogdanovich et al., 2011). Other multi-resistant examples are K. pneumoniae ST 14 and ST17, reported in Asia (Balm et al., 2013). Despite the presence of many other horizontally-transferable extended spectrum resistance mechanisms (e.g. β -lactams and carbapenems), the colistin resistance determinants remain located on the chromosome and do not appear to be horizontally transferable. It is acknowledged that, as shown for the clone ST258 (Bogdanovich et al., 2011), these strains have high capability for successful spread.

In EU/EEA livestock, enteric diseases are treated with colistin, mainly in swine and poultry. The amount of colistin used varies significantly for those EU/EEA countries for which there are data on consumption. Differences in colistin use might result from amongst others; local bacterial resistance situation, management, production type and available marketing authorisations. If colistin is no longer available then it could be speculated that other antimicrobials or medication (example zinc oxide in pig production) would replace its use if no other interventions are taken (biosecurity, vaccination, hygiene...). In a recent prospective experimental study, zinc oxide (ZnO) showed to be as effective as colistin (compared to oral and in feed groups) on piglet health and production parameters the control of weaning diarrhoea, with a better daily weight gain during the supplemented period and a reduced diarrhoea score (Van den Hof et al., submitted). In the case of zinc oxide, other issues such as environmental impact and co-selection of resistance as for example livestock associated MRSA should be taken into account (Amachawadi et al., 2015; Cavaco et al., 2011). The alternatives to colistin, depending on the resistance situation in a particular country, are aminopenicillins,

trimethoprim-sulphonamides, tetracyclines, aminoglycosides, and the critically important antimicrobial cephalosporins and fluoroquinolones. The latter are of particular concern due to emerging ESBL resistance (EMEA/CVMP/SAGAM, 2009) (EFSA BIOHAZ Panel, 2011). Although food-producing animals are the main concern for the transmission of antimicrobial resistance from animals to man, the risk of transmission of antimicrobial resistance *via* direct contact from companion animals should be taken into account.

Until recently there was no evidence that the use of colistin in veterinary medicine for food-producing species has resulted in the transfer of colistin resistance from animals to humans. Nevertheless, based on current data, transmission of such resistance is likely to have taken place in the EU/EEA, albeit at low frequency, with the exception of specific cohorts from Asian origin. The results from China (Liu et al., 2015; Shen et al., 2016) indicate that a rapid increase cannot be excluded (Skov and Monnet, 2016). For other drug resistant organisms including *E. coli*, the emergence following antimicrobial consumption and the transfer *via* direct animal contact or *via* food has already been documented (Angulo et al., 2004). The increasing use of colistin in humans, in particular in well-defined settings will lead to increased selection pressure which may be the catalyst for dispersal of zoonotic colistin resistance mediated by *mcr-1* (Skov and Monnet, 2016). Multifactorial cycling of these reservoirs of genes via hotspots of colistin use in e.g. intensive care medicine (Ingenbleek et al., 2015), via the environment at large (Zurfuh et al., 2016) and fattening poultry, pigs and veal calves (Callens et al., 2016) need to be considered in the analysis of the epidemiology and for targeted interventions.

The *mcr-1* gene has been found in clinical cases of veterinary colibacillosis in veal calves and pigs (Haenni et al., 2016; Malhotra-Kumar et al., 2016a; Richez and Burch, 2016) and in human invasive pathogens (Skov and Monnet, 2016). The *mcr-1* genes were found in similar plasmids in the same bacteria species isolated from food-producing animals, food humans and environment indicating a possible transmission between these compartments.

Data from 2012 compared after controlling for biomass in a joint report from ECDC, EFSA and EMA, has shown that consumption of polymyxins, mainly colistin, was on average more than 600 times higher in food-producing animals than in humans for the included 19 Member States in the EU and EEA. (ECDC/EFSA/EMA, 2015; Olaitan et al., 2015). Since *mcr-1* is substantially more sparse in humans compared to animal isolates (Kluytmans-van den Bergh et al., 2016) the hypothesis that it might have originated from animals and then attain humans is plausible (Skov & Monnet, 2016). The fairly low presence in humans so far, might be due to absence of selection in a non-favourable environment as indicated by the fact that all travellers that were tested positive for *mcr-1* upon return were negative after one month (Arcilla et al., 2015). According to Skov & Monnet, the presence of plasmid-mediated colistin resistance in foods and asymptomatic human carriers combined with increasing colistin use in EU/EEA hospitals may be a game changer and the EU/EEA may face hospital outbreaks of infections with colistin resistant MDR (Skov & Monnet, 2016).

7. Conclusions on updated literature review

- Despite its high toxicity, colistin is a last resort antimicrobial for the treatment of severe infections caused by highly resistant bacteria in human medicine (among others carbapenemase-producing *A. baumannii*, *P. aeruginosa*, *K. pneumoniae* and *E. coli*). Polymyxins with a more favourable toxicological profile deserve attention for further research.
- Following its discovery of the horizontally transferable colistin gene *mcr-1* in 2015, the number of reports is very rapidly increasing with a recent increase in animal sources although the relative proportion amid human clinical isolates in the EU/EEA remains fairly low (less than 1%), so far.

- Despite the recent nature of the *mcr-1* discovery, this is an indication of limited spread of colistin resistance from food-producing animals to human patients, and to a lesser extent vice versa. *Mcr-1* genes were found in similar plasmids in the same bacteria species isolated from food-producing animals, food humans and environment indicating a possible transmission between these compartments.
- Transfer of resistance either on mobile genetic elements (such as plasmids) between bacteria or from animals to humans has been suggested based upon prevalence studies but appears to remain at an overall low incidence in the EU/EEA.
- It is of therapeutic importance for the treatment of Gram-negative gastrointestinal infections in certain food-producing species.
 - From the data available from 26 EU/EEA countries, colistin is the 5th most used antimicrobial for food-producing animals (6.1%). There is large variation between MSs in the extent of use of colistin. From the data available the variation cannot be directly linked to specific animal species, category or husbandry system in an individual MS with some MSs having a low level, or no use of the substance, suggesting that there is scope to decrease the overall use of colistin within the EU.
- Acquired resistance mechanisms are no longer limited to a stepwise process *via* mutations in target
 bacteria and plasmid mediated spread is emerging. In humans the clonal resistance (mutations)
 forms can develop rapidly and can spread efficiently under certain conditions in hospitals.
 - Since resistance to other antimicrobial classes are frequently found in the same bacteria that harbour *mcr-1*, this form can easily spread due to both the use of colistin and co-selection of other antibiotic classes.
- The mechanisms and evolutionary pathways resulting in decreased susceptibility for colistin in certain *Salmonella* serovars remain to be fully understood.

8. Profiling of the risk to public health resulting from the use of colistin in animals in the EU

- Due to the major data gaps relating to risk factors, particularly in relation to a lack of information
- about the historical and current prevalence of colistin resistance and the *mcr-1* gene and its evolution
- 976 in bacteria in animals, humans and food, this risk profiling is based substantially on expert opinion. As
- 977 new evidence becomes available, this profiling may need to be revised.

8.1. Hazard identification

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- 979 Use of colistin in animals can select for colistin-resistant Enterobacteriaceae which have the potential
- 980 to be transmitted to humans. In addition to chromosomal mechanisms of resistance to colistin, a
- 981 plasmid-borne mechanism has recently been identified (MCR-1). The mcr-1 gene is associated with
- 982 transposable elements located on different types of plasmids (Kuo et al., 2016; Skov and Monnet,
- 983 2016) and has been shown to be present in strains that harbour genes encoding for ESBLs and
- 984 carbapenemases and for resistance to many other antimicrobial classes (Kuo et al., 2016; Poirel et al.,
- 985 2016). Therefore the use of other antimicrobial classes both in human and veterinary medicine could
- 986 maintain mcr-1 colistin resistance. The potential for co-selection is high and colistin-resistant
- 987 organisms may also be multi-drug resistant.

8.2. Exposure

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989 Release of resistance genes from animals treated with colistin: colistin is used extensively in food-990 producing animals, especially as group treatments for pigs, poultry and veal calves. It is mostly 991 administered via the oral route and has low bioavailability, even among experimentally-infected 992 animals (Rhouma et al., 2015), so direct exposure of the gastrointestinal microbiota is high. The 993 colistin dose used in the EU is bactericidal limiting the selection of resistant target organisms 994 (Guyonnet et al., 2010); the impact on commensals is less clear. The transfer of mcr-1 plasmids 995 between commensal Enterobacteriaceae has been shown to be very high in vitro. This has yet to be 996 demonstrated in vivo but has the potential to lead to an increase in the previously stable levels of 997 colistin resistance. The prevalence of colistin-resistant Salmonella and E. coli organisms in 998 food-producing animals appears to be low overall in major species. Based on the new mechanism of 999 resistance including the presence of linked resistance genes, the overall risk for release of resistance 1000 genes is now assessed as potentially high.

Exposure of humans to resistance genes *via* bacteria from animals: The consumption of pork and poultry products in the EU is high (consumption of veal is relatively low). Contamination of meat with *Salmonella* spp. is low, but as with other foodborne organisms, dependent on hygiene and food type amongst other factors. Although data are limited, general prevalence of colistin resistance in *E. coli* and *Salmonella* spp. from EU produced meat appears to be low, although prevalence in poultry and turkey should be investigated further based upon individual country reports (Italy, Germany, France and the Netherlands). Exposure to resistance genes may occur via other routes, e.g. direct contact with animals and manure in the environment.

8.3. Consequences to human health/ hazard characterisation

Colistin is an antimicrobial of last resort in human medicine that is used systemically to treat serious 1010 1011 infections caused by carbapenem-resistant bacteria that are generally also multi-drug resistant. As 1012 there are often no alternative treatments for these patients, the consequences of colistin- resistant 1013 infections are serious (death). Across the EU, with clear exceptions in defined areas, very low numbers 1014 of human patients require treatment with colistin each year and prevalence of colistin resistance is low. 1015 In recent years colistin use has been increasing rapidly in southern European regions as a consequence 1016 of increasing carbapenem resistance and this will increase the selection pressure for colistin resistance. 1017 The prospect of new alternative antimicrobial substances coming forward in the near future is very 1018 limited, and alternative antimicrobials (e.g. temocillin) are not available across all countries in the 1019 EU/EAA region.

8.4. Overall risk estimation/characterisation

A plasmid-borne mechanism of resistance to colistin (MCR-1) has recently been identified in Enterobacteriaceae from food-producing animals. Colistin is used extensively in pigs, poultry and veal calves, administered to groups of animals predominantly via the oral route. At present, levels of colistin-resistance in Enterobacteriaceae from animals are estimated as low; although data on the prevalence of colistin resistance, including the *mcr-1* gene, and its progression over time are limited. Taking into account the nature of veterinary use of colistin, the characteristics of the newly identified mechanism of resistance and the opportunity for co-selection (**Table 2-Table 7** and **Table 9**), suggests that colistin resistance has the potential to spread rapidly and to be associated with MDR organisms which could transfer to humans, for example via food, litter, or surface water. Colistin is used in human medicine as an antimicrobial of last resort for the treatment of serious MDR infections

that are also resistant to carbapenems. The occurrence of carbapenem resistance, subsequent use of colistin, and therefore its importance to human medicine have increased substantially in regions of southern Europe in recent years. The prospect of novel alternative antimicrobials for treatment of these infections in the near future is limited. In conclusion, although there are limited data on the evolution of colistin resistance, the newly identified mechanism has the potential for rapid spread and, coupled with the recent increasing importance of colistin to human medicine, this leads to an increased risk to human health from the use of colistin in animals.

9. Risk Management options

9.1. Recommended risk management options for colistin

The main recommendation is that colistin sales for use in animals should be reduced to the minimum feasible and that colistin should be added to a more critical category (category 2) of the AMEG classification (**Table 8**).

Category 2 includes those antimicrobial classes listed as critically important antimicrobials by the WHO for which the risk to public health from veterinary use is considered only acceptable provided that specific restrictions are placed on their use. These reserved antimicrobials should only be used when there are no effective alternative antimicrobials from category 1 authorised for the respective target species and indication. Use of colistin should be reserved for the treatment of clinical conditions which have responded poorly, or are expected to respond poorly, to antimicrobials in category 1.

Table 8. Classification of antimicrobial classes according to their probability of transfer of resistance genes and resistant bacteria

Antimicrobial class	Mobile genetic element- mediated transfer of resistance ^a	Vertical transmission of resistance gene(s) ^b	Co- selection of resistance ^c	Potential for transmission of resistance through zoonotic and commensal food-borne bacteria ^d	Evidence of similarity of resistance: genes / mobile genetic elements / resistant bacteriae	Overall probability of resistance transfer	References
Assessment							
2013							
Polymyxins	1	1	2	1	1	Low	(EMA, 2013)
(e.g. colistin)							
Assessment							
2016							
Polymyxins	3	1	2	3	3	High	UPDATE
(e.g. colistin)		ofer of registance. Do					2016

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

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

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

^dTransmission of resistance through zoonotic and commensal food-borne bacteria. Defined as transmission of resistance through food-borne zoonotic pathogens (e.g. *Salmonella* spp., *Campylobacter* spp., *Listeria* spp., *E. coli* VTEC) or transmission of resistance through commensal food-borne bacteria (e.g. *E. coli*, *Enterococcus* spp.). Probability (1 to 3): 1, no transmission of resistance through food-borne zoonotic pathogens or commensal food-borne

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

The scoring of the table above is based on the expert opinion of the members of the Working Group.

9.1.1. Considerations when proposing risk management measures

- A balance should be found between the need to protect public health and the potential impact of risk management measures on animal health (One Health approach).
- Colistin is mainly used in pigs, poultry, and veal calves to treat *E. coli* which causes serious diseases with potential for high morbidity and mortality. Resistance to category 1 antibiotics is common.
- Alternatives to the use of colistin for treatment of the indicated diseases include other critically
 important antimicrobials and removal of colistin from the market could increase the selection
 pressure for resistance to these substances through increased use.
- Because of the high potential for co-selection with other classes, as well as reducing the use of
 colistin it is important that there is an overall reduction in the use of antimicrobials of all
 classes.
- Eliminating any prophylactic use will be essential to achieve a significant reduction of sales of colistin for veterinary use.
- In December 2014 the CVMP recommended to restrict the indications for use of colistin to treatment of enteric infections caused by susceptible non-invasive *E. coli* only, that any indications for prophylactic use should be removed and the treatment duration limited to the minimum time necessary for the treatment of the disease and not exceeding 7 days. In addition, it was recommended to remove horses from the SPCs on the grounds of target species safety concerns. Commission Decision (2015)1916 of 16 March 2015 translated the CVMP recommendation into legislation.
- In April 2016 the CVMP recommended the withdrawal of the marketing authorisations for all veterinary medicinal products containing colistin in combination with other antimicrobial substances.
- As colistin is used in all the major food-producing species, measures in only one animal species would not provide the expected results in terms of reduction of use.
- Use of colistin as reported to ESVAC (26 countries) decreased 19% between 2011 and 2013 in terms of tonnes of colistin sold.
- Countries with a low consumption of colistin should be encouraged not to increase such use.
- Targets should ideally be established by animal species, but as comparable consumption data per animal species across the EU are not available, this is not possible.

9.1.2. Recommendation on target for use of colistin and considerations on impact on use of other antimicrobials

- 1108 In order to reduce the exposure of Enterobacteriaceae in animals to colistin and hence the possibility of
- 1109 further selection of colistin-resistance genes which have the potential to be transmitted to humans, the
- 1110 use of colistin in mg/PCU should be reduced. This reduction in use should be achieved without a
- 1111 consequential increase in the consumption (in mg/PCU) of fluoroguinolones, 3rd- and 4th-generation
- cephalosporins or the overall use of antimicrobials.
- 1113 The consumption of antimicrobials (amount in mg) can be compared over countries by adjusting for
- the biomass under exposure (kg livestock), which is expressed by the population correction unit (PCU).
- 1115 Use of colistin in the EU/EEA countries varies significantly; some EU countries have reported a high
- 1116 consumption of colistin per kg of biomass produced, whilst others have reported little or no use. Taking
- into account the current use of colistin, the possible alternatives to its use, impacts on animal health
- 1118 and welfare and the tendency over recent years to reduced consumption of colistin, it is proposed that
- there is a target for MSs to reduce use to a maximum of 5 mg colistin/PCU (as reported by ESVAC).
- 1120 Further reasoning for the target is provided under "justification for the target".
- 1121 If successfully applied at an EU level, the above threshold would result in an overall reduction of
- approximately 65% of the current sales of colistin for veterinary use; this decrease should build upon
- the decrease of colistin sales for veterinary use already seen between 2011 and 2013.
- 1124 For those countries with a colistin consumption below 5 mg/PCU, the recommendation should not
- 1125 result in an increase of the colistin consumption. For those countries with a consumption that is well
- below the proposed 5 mg/PCU, the trends on colistin consumption should be analysed case by case in
- the concerned country. In some countries with high pig and poultry production, e.g. Denmark
- 1128 (0.5 mg/PCU) and the Netherlands (0.9 mg/PCU), the level of consumption of colistin is below 1
- mg/PCU. Member states should consider the possibility of setting stricter national targets therefore,
- ideally a lower level than 5 mg/PCU of colistin, e.g. below 1 mg/PCU, is desirable. There is insufficient
- information to establish the feasibility of such a measure in all countries, and the impact of those
- intended reductions on colistin resistance.
- 1133 The above target for sales reduction of colistin should be achieved in a period of 3 to 4 years. Through
- 1134 the EU surveillance programmes, the impact of the measures should be closely monitored and
- 1135 assessed to conclude on their impact on antimicrobial resistance, including on the presence of the
- 1136 *mcr-1* gene in animals and humans, if data are available.
- 1137 Because of the possibility of co-selection, an overall reduction of all antimicrobials use should be
- 1138 achieved, especially for those countries for which the antimicrobial consumption, expressed as
- mg/PCU, is very high. The reduction of sales of colistin should not be compensated by increase in the
- use of other classes; it should be achieved by other measures such as improved farming conditions,
- biosecurity in between production cycles, and vaccination.

9.1.3. Further considerations

- 1143 Antimicrobial sales data are not available to ESVAC for Greece and Malta. Those MSs would need to
- start such collection in order to provide the results of colistin sales in mg/PCU.
- 1145 As indicated above, in case circumstances lead to a significant increase (or decrease) in the risk to
- 1146 public health due to the use of colistin in animals the recommended measures should be revised.

- 1147 The levels of resistance to colistin in humans, animals and derived foods and prevalence of mcr-1
- 1148 herein should be measured in order to establish a baseline from which to assess the impact of the
- 1149 measures.

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- 1150 The use of colistin, fluoroquinolones and 3rd- and 4th-generation cephalosporins and the reasons for
- 1151 use, should be recorded by the prescribing veterinarian and provided to the authorities as requested.
- 1152 MSs are encouraged to set up systems to request and analyse these data.

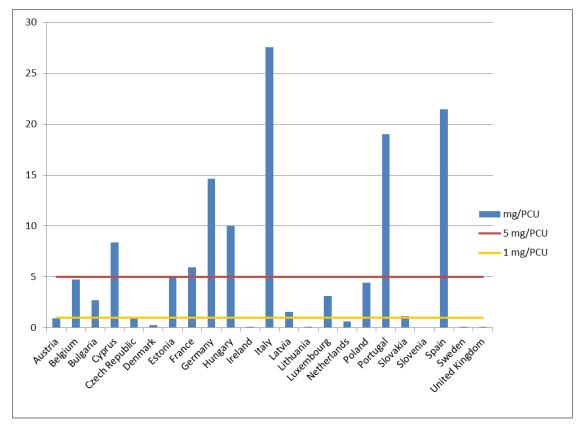
9.1.4. Justification for the target

- 1154 One of the objectives when establishing the target was to ensure that from the current experience
- from EU countries with a high production of pigs and poultry, it is possible to produce those animals
- 1156 with a consumption of colistin that is below the proposed target. The proposed target is higher than
- the current sales of colistin in some countries with high production of pigs and poultry (i.e. above 50%
- PCU). Although the target will demand a very important reduction in the use of colistin for some high
- using countries (more than 80% reduction in the most extreme case), it should still allow for the
- 1160 treatment of animals in those cases where colistin would remain the best option. It was considered if
- the target should be reduced to below 5 mg/PCU, but reducing the consumption of colistin in high
- using countries before they have had time to implement compensatory strategies could result in an
- increase of use of other critically important antimicrobials (e.g. fluoroquinolones), or overall use, which
- 1164 could be counterproductive for public health.

9.1.5. Summary of the risk mitigation recommendations

- 1166 Colistin should be added to category 2 of the AMEG's classification; the risk to public health from
- 1167 veterinary use is considered only acceptable provided that specific restrictions are placed on its use.
- 1168 Colistin should be reserved for the treatment of clinical conditions which have responded poorly, or are
- expected to respond poorly, to antimicrobials in category 1.
- 1170 There are wide variations in the use of colistin between countries which are largely unexplained.
- 1171 Countries with intensive livestock production can have a level of usage below 1 mg/PCU (e.g. Denmark
- and the UK) and much higher, up to 20-25 mg/PCU (Italy and Spain). Considering the rapidly
- increasing importance of colistin for treatment of critically ill human patients, all countries should strive
- to reduce the use of polymyxins as much as possible.
- For the current "high and moderate consumers" the target and desirable levels are set at 5 and 1 or
- 1176 below 1, mg/PCU, respectively, based on the observations on the level of use in other countries.
- 1177 Meanwhile more information should be gathered to determine the minimum level of colistin use that
- can be achieved while maintaining animal welfare and preventing the increased use of other critically
- important antimicrobials.
- 1180 If the situation regarding colistin resistance in animals or humans deteriorates further it may be
- necessary to lower the level proposed targets.
- 1182 Reduction in use of colistin should be achieved without an increase in the use (in mg/PCU) of
- fluoroguinolones, 3rd- and 4th-generation cephalosporins or overall consumption of antimicrobials.
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9.2. Strategies for responsible use and alternatives to the use of colistin

Strategies for the responsible use of colistin in veterinary medicine, can be subdivided into approaches that limit or fine-tune the use, and approaches that replace the use of the substance.

To limit or fine-tune use, a better identification of animals that are diseased versus animals that do not need treatment is required. Appropriate diagnostics should be undertaken to establish the cause of disease and identify the appropriate antimicrobial treatment for the group, if needed.

Secondly improving the antibiotic regimen by applying PK/PD analyses to assist in dose regimen selection (Guyonnet et al., 2010), along with identifying a minimum number of days under exposure is another option. In a recent systematic review (Burow et al., 2014) it was concluded that orally administered antimicrobials increase the risk of antimicrobial resistance in *E. coli* from swine, although it was noted that more research is needed into the impact of dosage and the longitudinal effects of treatment.

Further improved herd management, in particular biosecurity through well controlled cleaning and disinfection strategies (biocides) (Carlsson et al., 2009), in between production cycles should be encouraged to limit the accumulation of resistance genes over consecutive production cycles (Dorado-García et al., 2015; Geenen et al., 2011; Schmithausen et al., 2015). Good farming practices and herd health planning including animal quarantine, restrictions on movements before freedom of disease certification, among others, prevent spread of infections and therefore reduce the need for antimicrobials (EFSA/EMA, foreseen 2016). Vaccination, voluntary and later mandatory, has been proved in broilers to reduce the occurrence of *Salmonella* spp. and thereby the need for antimicrobial

- 1209 consumption (Dewaele et al., 2012). Vaccines are available in the EU to reduce the incidence of enteric
- 1210 E. coli infections in piglets.
- 1211 Pro- and prebiotics, and in a broader sense faecal transplants have shown in human medicine to be
- 1212 extremely useful for the control of antibiotic associated diarrhoea (Clostridium difficile) (Cammarota et
- 1213 al., 2015). Instead of giving long-term doses of antibiotics via feed or water, the digestive tract
- 1214 content can be replaced with healthy bacteria. Given the high number of indications for antimicrobials
- related to the digestive tract in pigs (Stege et al., 2003), veal calves (Pardon et al., 2012) and broilers
- 1216 (Persoons et al., 2012), this approach must receive consideration for further research. These
- 1217 historically named 'transfaunations' have been used for gastrointestinal disorders in horses. Organic
- 1218 acids and metals (Cu, Zn) are alternatives to reduce the use of antimicrobials at large and colistin in
- particular although attention should be paid to environmental concerns relating to the use of metals.
- 1220 For an exhaustive review on alternatives to replace or to reduce the selection pressure exerted by
- 1221 antimicrobials in animal husbandry, we refer to the RONAFA working group (Reduction of Need for
- 1222 Antimicrobials in Food-producing Animals) document, to be completed by the end of 2016 (EFSA/EMA,
- 1223 foreseen 2016).

9.3. Previously applied risk management options

- 1225 Following the previous AMEG recommendations in 2013, the SPCs for authorised products were
- reviewed to ensure consistency for measures to ensure responsible use in regards to protecting animal
- health and limiting the possibility of future risk to public health. As detailed in Section 3.2. a referral
- 1228 was concluded under Article 35 of Directive 2001/82/EC for all VMPs containing colistin as a sole
- substance administered orally (including premixes) to food-producing animals (EMA/CVMP, 2015).
- 1230 Indications were restricted to therapy or metaphylaxis, all indications for prophylactic use removed and
- indications restricted to the treatment of enteric infections caused by susceptible non-invasive *E. coli*
- 1232 only.

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- 1233 The treatment duration was limited to the minimum time necessary for the treatment of the disease
- and not exceeding 7 days. Horses were removed from the SPCs on the grounds of target species safety
- 1235 concerns.
- 1236 In April 2016 the CVMP recommended the withdrawal of the marketing authorisations for all veterinary
- 1237 medicinal products containing colistin in combination with other antimicrobial substances.

9.4. New indications, formulations or species

- 1239 New indications, formulations or species (e.g. fish) should be subject to full antimicrobial resistance
- risk assessment before approval. This is the standard procedure for any marketing authorisation
- 1241 application for an antimicrobial product for use in food-producing animals, but in this case it is
- 1242 especially important that the relevance of colistin for human medicine is considered for any new
- 1243 marketing authorisation.
- 1244 Studies that further examine the effect of different formulations of colistin (polymyxins) on duration of
- 1245 symptoms, and excretion of relevant bacteria and their antimicrobial susceptibilities would help to
- identify and to decrease inappropriate use.

1247 9.5. Surveillance of colistin consumption and of colistin resistance

- 1248 The use of colistin in MSs is monitored as part of the ESVAC project in terms of overall use. The
- 1249 monitoring system should be enhanced to provide figures on use per species, production type and
- 1250 weight class.
- 1251 The revised EU/EEA harmonised monitoring of antimicrobial resistance now requires all MSs to perform
- 1252 standardised and quality controlled susceptibility testing of colistin on representative samples of
- zoonotic and indicator bacteria (Salmonella spp. and E. coli). The findings from such testing are
- 1254 reported by MSs as phenotypic data on colistin resistance. This monitoring system could be enhanced
- 1255 by selecting a random sample of resistant isolates that are subsequently screened for resistance
- mechanisms, this would facilitate in particular the detection of emerging resistance genes.
- 1257 Surveillance of target animal pathogens isolated from clinical cases should be implemented to ensure
- 1258 an early detection of any change on resistance patterns. As there is no official surveillance of target
- 1259 animal pathogens, therefore such a system should be implemented. The practical challenges for
- 1260 surveillance are recognised and are not restricted to colistin.

9.6. General considerations

- 1262 Treatment of individual animals is preferred.
- 1263 Rapid, reliable diagnostic tests combining accurate bacterial identification (e.g. mass spectrometry)
- 1264 and colistin susceptibility testing (Liu et al., 2016) should be explored and tested under routine
- 1265 laboratory conditions.

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- 1266 The rapid accumulation of a considerable amount of additional information following the first report of
- 1267 mcr-1 in November 2015, together with insights in mutations responsible for decreased colistin
- 1268 susceptibility (Wright et al., 2016) highlights the strength of whole genome sequencing (WGS) and
- publicly-available sequence databases (Skov and Monnet, 2016).
- 1270 Biosecurity measures, in particular in between production cycles, should be implemented to reduce the
- need for use of antimicrobials in general (including colistin).

9.7. Follow up of the advice

- 1273 This recommendation should be reviewed after 3 to 4 years to determine (i) if the targets on
- 1274 antimicrobial consumption have been achieved, (ii) if possible, if there has been any impact on the
- 1275 prevalence of colistin resistance in food-producing animals, although acknowledging that there are
- 1276 limited data, especially in regards to the mcr-1 gene and that more time might be required to observe
- 1277 changes in resistance levels. At this time, further consideration should be given to any changes in the
- 1278 need for and use of colistin in human medicine and the occurrence of colistin resistance in humans.
- 1279 The effectiveness of the proposed measures should then be reviewed taking a 'One Health' approach,
- 1280 and further considerations on the measures as detailed in section 11 should be addressed.
- 1281 Further studies on the mechanism and routes of transmission of colistin resistance from animals to
- 1282 humans would be useful to clarify the areas where information available is limited.

1284 **ANNEX**

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10. Risk Management options that were analysed and

1286 disregarded

10.1. Withdrawal of existing marketing authorisations

- 1288 The withdrawal of marketing authorisations was considered but it was noted that, in addition to
- 1289 potential animal health and welfare impacts, this could increase the use of other CIAs, in particular
- 1290 fluoroquinolones, as there are high levels of resistance to category 1 alternative substances for the
- 1291 given indications. It could be speculated that due to the high potential for co-selection by other
- 1292 antimicrobial classes, the mcr-1 gene would still be maintained in animal populations after withdrawal
- 1293 of colistin.

10.2. Group treatments

- 1295 The option of placing restrictions to reduce the use of colistin for the treatment of groups of animals
- was discussed. Approximately 99% of use of colistin is in oral formulations which are mostly used for
- 1297 group treatment within herds/flocks. The same reasons as provided above for not recommending the
- withdrawal of existing marketing authorisations apply for not banning group treatment.
- 1299 It was also considered if premix formulation should be withdrawn since these could have greater
- tendency to be used off-label for prolonged duration of (preventive) treatment. ESVAC data suggest
- that in those MSs where use of medicated feeds is limited, this does not necessarily impact colistin
- 1302 sales and oral powder and solution formulations are used instead. In addition, due to differences in use
- of premix and other oral formulations that may be associated with availability and national legislation,
- this measure would be inconsistent across the EU.

10.3. Restriction on use for metaphylaxis

- 1306 As 99% of use of colistin is in oral formulations which are mostly used for simultaneous group
- 1307 treatment and metaphylaxis within herds/flocks, and it is difficult to separate medication of clinically ill
- and "in-contact" animals in intensive husbandry systems, it was considered that this measure would
- not be practical to implement effectively.

10.4. Restriction from use in certain species

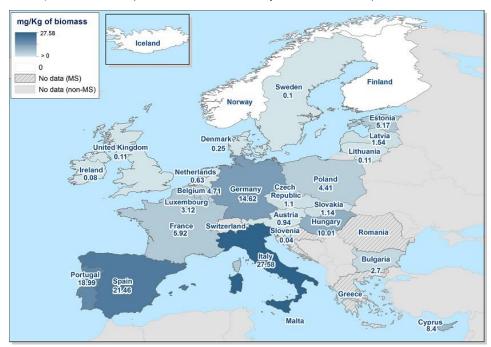
1311 Sufficient species-specific data are not available to perform the risk assessment required.

10.5. Injectable, intramammary and topical formulations

- 1313 Taking into account the fact that these formulations account for less than 1% of colistin sales, are
- mostly used for individual animal treatment and via non-enteral routes of administration, it was
- 1315 considered that restrictions on these colistin formulations would have minimal impact on the risk to
- 1316 public health.

1317 **11. Figures**

Figure 5. Spatial distribution of sales of polymyxins in veterinary medicine, in mg/kg biomass, in 26 EU/EEA countries, for 2013. No sales reported in Finland, Iceland and Norway. (EMA/ESVAC, 2015)



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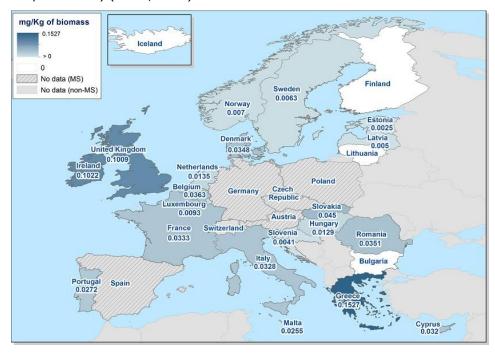
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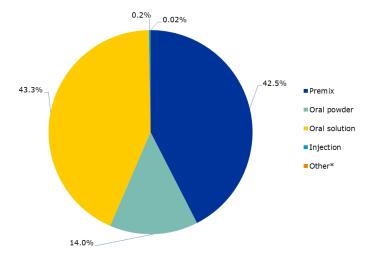
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Figure 6. Spatial distribution of sales of polymyxins in human medicine, in mg/kg biomass, in 25 EU/EEA countries, for 2013 (data shown only for countries reporting on total consumption in the country; i.e. reporting for antibiotic consumption in the community (outside hospitals) and in the hospital sector) (ECDC, 2015)



Please note that **Figure 5** and **Figure 6** show polymyxin consumption expressed in mg/kg biomass with a different scale because consumption is much lower in humans than in animals.

Figure 7. Percentage of veterinary sales in mg/PCU for food-producing animals, by pharmaceutical form of polymyxins, in the EU/EEA for 2013. No sales reported in Finland, Iceland and Norway. (EMA/ESVAC, 2015) (unpublished ESVAC data 2013)



*Negligible amount of polymyxins were sold as oral paste, bolus, intramammary and intrauterine preparations.

Figure 8. Copy of the February 2016 call for scientific data for the update of advice

Advice on the impact on public health and animal health of the use of antibiotics in animals (colistin) following the recent discovery of the first mobile colistin resistance gene (mcr-1)

Call for scientific data for the update of advice

Submission period: 29 February - 15 March 2016

1341 Dear colleagues,

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The CVMP and CHMP invites all interested parties to submit any scientific data which might have impact on public and animal health that should be considered when updating the previously published advice on **colistin**.

The answers should address some of the following points:

- The importance of colistin to human and veterinary medicine (e.g. estimated frequency of use, target indications, including selective digestive tract decontamination, estimation of the use per animal species).
- Any information on colistin resistance mediated by the mcr-1 gene in isolates from humans and animals, including animal pathogens.
- The effectiveness and availability of alternative treatments to the use of colistin in human and animals especially if restrictions on the use of colistin would be applied.

1353 Experiences on colistin resistance risk management measures such as changes in indications, 1354 restrictions of use, husbandry practices or controls of imported food for the protection of public and 1355 animal health in Europe. 1356 1357 For further details see http://www.ema.europa.eu/docs/en GB/document library/Other/2016/02/WC500202544.pdf and 1358 1359 http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general/general content 000639.js p&mid=WC0b01ac058080a585 1360 1361 The call is open until 15 March 2016. 1362 Scientific contributions should be sent by email to: vet-quidelines@ema.europa.eu 1363 1364

Source	Year*	Country	Type of specimen/animal /infection	Origin/ travelled region	Isolates n (%)	Species	Extended-spectrum beta-lactamase (ESBL)	Carbapenemase	Reference
	1980s-2014	China	Chickens	a	104	E. coli	NA	NA	(Shen et al., 2016)
	2005-2014	France	Veal calves	a	106	E. coli	CTX-M-1 (n = 7)	No	(Haenni et al., 2016)
	2008-10	Japan	Pigs	a	2	E. coli	NA	NA	(Suzuki et al.)
	2009-2011	Spain	Pigs	a	4	S. Typhimurium; S. rissen	NA	NA	(Quesada et al., 2016)
	2010-2014	Spain	Pigs, turkeys	a	5	E. coli, Salmonella	NA	NA	(Quesada et al., 2016)
	2010-2011	Germany	Pigs	a	3	E. coli	CTX-M-1 (n = 3)	No	(Falgenhauer et al., 2016)
	2010-2015	The Netherlands	Chickens, veal calves, turkeys	a	4 (< 1%)	E. coli	NA	NA	(Bonten, 2014)
	2011	France	Pigs	a	1 (<1%)	E. coli	NA	NA	(Perrin-Guyomard et al., 2016)
	2011-12	Belgium	Pigs	a	6	E. coli	No	No	(Malhotra-Kumar et al., 2016a)
	2011-12	Belgium	Veal calves	a	7	E. coli	No	No	(Malhotra-Kumar et al., 2016a)
	2012	Laos	Pigs	a	3	E. coli	NA	NA	(Olaitan et al., 2015)
Food-	2012	China	Pigs	a	31 (14%)	E. coli	NA	NA	(Liu et al., 2015)
producing animals	2013-2014	Vietnam	Chicken and pig	a	37 (21%)	E. coli	NA	NA	(Nguyen et al., 2016)
allillais	2012-13	Japan	Cattle	a	4	E. coli	CTX-M-27	No	(Suzuki et al.)
	2012-2015	Taiwan	Chicken, Pigs	a	18 (5.9%)	E. coli	CTX-M-		(Kuo et al., 2016)
	2013	Japan	Pigs	a	1	<i>Salmonella</i> Typhimurium	NA	NA	(Suzuki et al.)
	2013	China	Pigs	a	68 (25%)	E. coli	NA	NA	(Liu et al., 2015)
	2013	Malaysia	Chickens	a	3	E. coli	NA	NA	(Petrillo et al., 2016)
	2013	Malaysia	Pigs	a	1	E. coli	NA	NA	(Petrillo et al., 2016)
	2013	France	Pigs	a	1 (<1%)	E. coli	No	No	(Perrin-Guyomard et al., 2016)
	2013	France	Chickens	a	3 (2%)	E. coli	No	No	(Perrin-Guyomard et al., 2016)
	2013	France	Chickens (farm)	a	1	Salmonella 1,4 [5],12:i:-	NA	NA	(Webb et al., 2015)
	2013	Italy	Turkeys	a	3 (1%)	Salmonella	No	NA	Alba et al., 2016 ECCMID
	2013	Italy	Turkeys	a	58 (19.3%)%	E. coli	No	NA	Alba et al., 2016 ECCMID
	2014	France	Broilers	a	4 (2%)	E. coli	No	No	(Perrin-Guyomard et al., 2016)
	2014	France	Turkeys	a	14 (6%)	E. coli	CMY-2	No	(Perrin-Guyomard et al.,

Source	Year*	Country	Type of specimen/animal /infection	Origin/ travelled region	Isolates n (%)	Species	Extended-spectrum beta-lactamase (ESBL)	Carbapenemase	Reference
									2016)
	2014	Italy	Turkeys	a	1	E. coli	No	No	(Battisti, 2016a)
	2014	China	Pigs	a	67 (21%)	E. coli	NA	NA	(Liu et al., 2015)
	2014-15	Vietnam	Pigs	a	9 (38%)	E. coli	CTXM-55	No	(Malhotra-Kumar et al., 2016b)
	2014-15	South Africa	Chickens	a	9%	E. coli	NA	NA	(Keeton, 2016)
	2015	Tunisia	Chickens	France /Tunisia	37 (67%)	E.coli	CTX-M-1	NA	(Grami et al., 2016)
	2015	Algeria	Chickens	a	1	E. coli	NA	NA	(Olaitan et al., 2015)
Environment	2012	Switzerland	River water	a	1	E. coli	SHV-12	NA	(Zurfuh et al., 2016)
Livironinient	2013	Malaysia	Water	a	1	E. coli			(Petrillo et al., 2016)
	2009	The Netherlands	Chicken meat	Unknown	1	E. coli	CTX-M-1	No	(Kluytmans-van den Bergh et al., 2016)
	2009-2016	The Netherlands	Retail meat (mostly chicken and turkey)	Dutch fresh meat and imported frozen meat	47 (2%)	E. coli	NA	NA	(Bonten, 2014)
	2010	Canada	Ground beef	Unknown	2	E. coli	No	No	(Mulvey et al., 2016)
	2011	Portugal	Food product	NA	1	Salmonella Typhimurium	CTX-M-32	No	(Tse and Yuen, 2016)
	2011	China	Chicken meat	a	10 (5%)	E. coli	NA	NA	(Liu et al., 2015)
	2011	China	Pork meat	а	3 (6%)	E. coli	NA	NA	(Liu et al., 2015)
	2012	France	Chicken meat, guinea fowl pie	NA	2	<i>Salmonella</i> Paratyphi B	NA	NA	(Webb et al., 2015)
	2012	Thailand	Faecal carriage	а	2	E. coli	NA	NA	(Olaitan et al., 2015)
	2012	Laos	Faecal carriage	a	6	E. coli	NA	NA	(Olaitan et al., 2015)
	2012	Cambodia	Faecal carriage	a	1	E. coli	CTX-M-55	No	(Stoesser et al., 2016)
Food	2012-2014	Denmark	Chicken meat	Germany	5	E. coli	CMY-2, SHV-12	No	(Hasman et al., 2015)
	2012-2015	Belgium	Poultry meat	a	2	Salmonella	AmpCipColNalSmxTmp , AmpColStrSmxTet	NA	(Botteldoorn, N, in press)
	2012-2015	United Kingdom	Poultry meat	European Union, non- United Kingdom	2	Salmonella Paratyphi B var Java	NA	NA	(Doumith et al., 2016)
	2012-2015	Taiwan	Beef, Chicken, Pork	a	5.9%	E. coli	CTX-M	NA	(Kuo et al., 2016)
	2013	France	Pork sausage	NA	1	Salmonella Derby	NA	NA	(Webb et al., 2015)
	2013	China	Chicken meat	a	4 (25%)	E. coli	NA	NA	(Liu et al., 2015)
	2013	China	Pork meat	a	11 (23%)	E. coli	NA	NA	(Liu et al., 2015)
	2014	China	Chicken meat	a	21 (28%)	E. coli	NA	NA	(Liu et al., 2015)
	2014	China	Pork meat	a	29 (22%)	E. coli	NA	NA	(Liu et al., 2015)
	2014	The Netherlands	Chicken meat	Europe, non- Dutch (n = 1), origin unknown	2	E. coli	SHV-12	No	(Kluytmans-van den Bergh et al., 2016)

Source	Year*	Country	Type of specimen/animal /infection	Origin/ travelled region	Isolates n (%)	Species	Extended-spectrum beta-lactamase (ESBL)	Carbapenemase	Reference
			7	(n = 1)					
	2014	Switzerland	Vegetables	Thailand, Vietnam	2	E. coli	CTX-M-55, CTX-M-65	No	(Zurfuh et al., 2016)
	2014	China	Chickens	a	1	E. coli	CTX-M-65	NDM-9	(Yao et al., 2016)
	NA	The Netherlands	Turkey meat	a	10%	TBA			(Veldman, 2016)
	2008	Vietnam	Dysentery	Vietnam	1	Shigella sonnei	NA	NA	(Thanh et al., 2016)
	Before 2010	China	Faecal carriage	a	27 (7%)	NA	NA	NA	(Hu et al., 2015; Ruppé et al., 2016)
	2010-2014	Taiwan	Sterile sites	a	20 0.3%	E. coli	CTX-M	NA	(Kuo et al., 2016)
	2011	Canada	Gastrostomy tube	Egypt (previous healthcare)	1	E. coli	NA	OXA-48	(Mulvey et al., 2016)
	2011	The Netherlands	Bloodstream infection	a	1 (0.08%)	E. coli	NA	NA	(Bonten, 2014)
	2011& 2015	Denmark	Bloodstream infection		2 (<0.001%)	E. coli	ESBL	NA	(Hasman, 2015) Skov, R personal communication
	2012	Thailand	Faecal carriage	a	2	E. coli	NA	NA	(Olaitan et al., 2015)
	2012	Laos	Faecal carriage	a	6	E. coli	NA	NA	(Olaitan et al., 2015)
	2012	Cambodia	Faecal carriage	a	1	E. coli	CTX-M-55	No	(Stoesser et al., 2016)
	2012-2013	Vietnam	Chicken farmers Sub+rural inhabitants	a	(25.1%) (14.9%)	Coliforms	NA	NA	(Nguyen, 2016)
Humans	2012–2013	The Netherlands	Faecal carriage	China (n = 2), South America (n = 2), Tunisia, South-East Asia	6	E. coli	CTX-M-1, CTX-M-14, CTX-M-15, CTX-M-55 (2), CTX-M-65	No	(Arcilla et al., 2015)
	2012-2015	United Kingdom	Salmonellosis	Asia (n = 2)	8	<i>Salmonella</i> Typhimurium	No	No	(Doumith et al., 2016)
	2012-2015	United Kingdom	Salmonellosis	Asia	1	<i>Salmonella</i> Paratyphi B var Java	No	No	(Doumith et al., 2016)
	2012-2015	United Kingdom	Salmonellosis	a	1	Salmonella Virchow	No	No	(Doumith et al., 2016)
	2012-2015	United Kingdom	NA	NA	3	E. coli	CTX-M-type	No	(Doumith et al., 2016)
	2012-2015	Italy	Urine, SSI	a	8 (<0.02%)	E. coli	ESBL (2/8)	No	(Cannatelli et al., 2016)
	2012-2015	Spain	Clinical isolates	a	15 (0.15%)	E. coli	ESBL (3/15), 7 non MDR	No	(Prim et al., 2016)
	2012-2016	Argentina	Blood,urine, abscess, abdominal, bone	a	9+10	E. coli	4(CTX-M2,14,15)	No	(Rapoport et al., 2016)
	2014	Germany	Wound infection	NA	1	E. coli	No	KPC-2	(Falgenhauer et al.,

Source	Year*	Country	Type of specimen/animal /infection	Origin/ travelled region	Isolates n (%)	Species	Extended-spectrum beta-lactamase (ESBL)	Carbapenemase	Reference
			(foot)						2016)
	2014	China	Inpatient	a	13 (1%)	E. coli	NA	NA	(Liu et al., 2015)
	2014	China	Urogenital tract	а	2	E. aerogenes E. cloaca*	blaCTX-M-15, blaTEM- 1, qnrS, aac(6')-Ib-cr, armA*	NA	(Zeng et al., 2016)
	2014-2015	China	Bloodstream infection	a	2	E. coli	CTX-M-1	No	(Du et al., 2016)
	2014-2015	Denmark	Salmonellosis		4 (total 8397)	Salmonella			R. Skov, personal communication
	2015	Switzerland	Urinary tract infection	NA	1	E. coli	No	VIM	(Poirel et al., 2016)
	2015	China	Diarrhoea	a	3	E. coli	NA	NA	(Ye et al., 2016)
	2015	China	Inpatient	a	3 (<1%)	K. pneumoniae	NA	NA	(Liu et al., 2015)
	2015	China	Surgical site infection, peritoneal fluid	а	2	K. pneumoniae	CTX-M-1	NDM-5	(Du et al., 2016)
	2015	China	Faecal carriage (children)	a	5 (2%)	E. coli	CTX-M-15	No	(Zhang et al., 2016)
	NA	Sweden	Faecal carriage	Asia	2	E. coli	NA	NA	(Folkhalsomyndigheten, 2016)

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NA: not available; SSI: surgical site infection *: year of isolation is not synonym for study period a:Same as reporting country

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