



**Game Feed  
Trade  
Association**



**Veterinary  
Medicines  
Directorate**

## IMPORTANT JOINT COMMUNICATION – SPRING 2020

### **Antibiotic Use in Gamebirds MUST Fall Further**

The current global crisis has emphasised the very real need to keep health services resilient. For the UK gamebird sector this means continuing to drive down **all** unnecessary antibiotic use.

Our focus in 2020 is to encourage all gamebird rearers to provide better husbandry for their birds and to be proactive, consulting with their vets with the aim of reducing the need to treat with antibiotics (ABs). The lower numbers being reared this year provide a great opportunity to concentrate on that.

Meanwhile, the representative bodies for the veterinary profession will be bearing down on any unlawful prescribing, for example by non-avian vets who have been pressurised by clients into writing inappropriate scripts for gamebirds. Vets should only be prescribing for birds they have physically seen and have under their care.

We attach guidance on correct prescribing procedures for gamebirds, produced by the enforcing body, the Veterinary Medicines Directorate (VMD) and the Royal College of Veterinary Surgeons (RCVS). Please make sure that all your relevant contacts within the gamebird sector are aware of this document. If all the antibiotic used in 2020 is prescribed correctly, we *will* see further significant falls.

#### **Our other new recommendations to bring down AB use this year are:**

- All in-feed AB scripts to be signed by a British Veterinary Poultry Association (BVPA) member vet. This will help bear down on any inappropriate prescribing.
- Membership of the new British Game Alliance (BGA) Game Farm Audit, with its emphasis on better husbandry, provides an important management tool for reducing AB use. Covid-19 may restrict the number of actual audits carried out this year but the audit standards provide an excellent checklist for good husbandry. They are free to download from [www.britishgamealliance.co.uk](http://www.britishgamealliance.co.uk). The entire gamebird sector should also note that

from 2020 the BGA will be carrying out random testing for drug residues in game shot on its audited shoots.

- Prescription and use of Highest Priority Critically Important Antibiotics (HP-CIA's) for human medicine, which includes the fluoroquinolone enrofloxacin, must henceforth only be a last resort, backed up where possible and appropriate by diagnostic and sensitivity testing. Such use must be signed off by the vet on a custom-made justification form. The form is available on the Game Farmers' Association (GFA) website [www.gfa.org.uk](http://www.gfa.org.uk). Completed forms to be retained for three years.
- Macrolides (including tylosin and tylvalosin) and Pleuromutilins (including tiamulin) are now on the European Medicines Agency (EMA) 'amber' caution list. If diagnosis indicates a need for AB treatment, these products should *only* be considered for the most careful use when there are no clinically effective antibiotics available in a lower risk category.

Feed compounders have agreed to sell AB compounded feeds in multiples of 10 bags rather than a minimum one tonne batch.

The Game Feed Trade Association (GFTA) will help monitor any compounded AB's sitting in warehouses as the game rearing season nears its end and will notify game bird veterinary practices as to who has what, so no excess medicated feed is manufactured.

Along with National Gamekeepers' Organisation (NGO), the GFA will encourage local groups of gamekeepers/game farmers to share ideas on reducing AB usage – the best 'nudging' the worst.

The 2020 gamebird sector AB reduction meeting held in March determined that with the above recommendations, the sector should be targeting a further 40% reduction in AB use by 1<sup>st</sup> January 2024. Delegates at the meeting were aware that this would be challenging but all the above actions, plus the enforcement of new laws on AB use, carriage and storage will help the gamebird sector as a whole to deliver.

Over the past three years - and by working together – we have already cut AB use in gamebirds by around 50%. This progress is commendable but we have to go much further to keep these precious medicines available for treating human and animal disease.

Everyone in the UK gamebird sector must follow the advice and recommendations in this 2020 joint communication.

Thank you.



Veterinary  
Medicines  
Directorate

RCVS

## **Reminder on best practice concerning the prescribing and supply of antibiotics for gamebirds**

The Veterinary Medicines Directorate (VMD) and Royal College of Veterinary Surgeons (RCVS) would like to explain the legislation that governs the prescribing and supply of antibiotics, and would encourage anyone within the gamebird sector who has any concerns or suspicions of misconduct to report this as outlined.

A veterinary surgeon who prescribes a veterinary medicinal product classified as a POM-V, which includes all antibiotics, must first carry out a clinical assessment of the bird(s) and the bird(s) must be under that veterinary surgeon's care. A veterinary surgeon cannot usually have a bird under his or her care if there has been no physical examination.

In terms of current RCVS Code of professional conduct / guidance, in order for a bird to be under his/her care:

- The veterinary surgeon must have been given the responsibility for the health of the bird or flock by the owner or the owner's agent, and this must be real not nominal
- The bird or flock must have been seen immediately before prescription or recently/ often enough for the veterinary surgeon to have personal knowledge of the condition of the bird or current health status of the flock to make a diagnosis and prescribe
- The veterinary surgeon must maintain clinical records of that flock/ individual

Obligations also exist in relation to provision of 24 hour emergency first aid and pain relief.

Antibiotics should not be 'borrowed' or moved between farms or groups of birds on a farm as they are prescribed for a specific site, species and population.

If you are a veterinary surgeon and have any concerns about the conduct of a veterinary professional in relation to the Code of professional conduct, then these can be reported to the RCVS via:

<https://www.rcvs.org.uk/concerns/im-a-vet-professional-and-i-want-to-raise-a-concern/>

Or, if you are an animal owner, you should visit: <https://animalowners.rcvs.org.uk/concerns/>

The VMD enforces the Veterinary Medicines Regulations (VMR) and takes the issue of illegal supply of medicines (such as the use of unauthorised antibiotics) and suspected prescription misuse very seriously. Some examples of contraventions are:

- **Illegal supply of medicines –**
  - Veterinary medicines which are advertised for the treatment or prevention of disease, or which have that function, must be authorised by the VMD before they can be legally sold or used in the UK.
  - The marketing, importation, sale, supply, administration and possession of a veterinary medicine not in line with the regulations is illegal.
- **Prescription misuse** - this includes:
  - *Alteration of an existing prescription* – including changing the date the prescription was signed, changing the quantity of the product, inclusion of additional medicines or altering the number of repeats
  - *Prescription fraud* – includes supplying the same prescriptions to multiple retailers for supply and forging the signature of a vet, pharmacist or Suitably Qualified Person

Any known contravention should be reported to the VMD who will consider whether enforcement action is required. If you have any information about suspected illegal medicines use then please contact the VMD on: [enforcement@vmd.defra.gsi.gov.uk](mailto:enforcement@vmd.defra.gsi.gov.uk). You can also find a prescriptions misuse reporting form at:

<https://www.gov.uk/government/publications/report-prescription-misuse-animal-medicine>.

All information will be treated confidentially and will be considered carefully in line with the VMD's enforcement strategy\*.

If you have any further questions then please get in contact with either RCVS or VMD.

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\*VMD Enforcement Strategy

<https://www.gov.uk/government/publications/enforcement-strategy-for-animal-medicines>

Enforcement Notices

<https://www.gov.uk/government/collections/illegal-animal-medicines-seizure-and-improvement-notices>