



# Australia's Antimicrobial Resistance Strategy – 2020 and Beyond

Submission from the  
Australian Veterinary Association Ltd



28 June 2019

## The AVA

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9,500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and biosecurity systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the AVA.

## Submission

The World Health Organization has described antimicrobial resistance (AMR) as one of the key global health issues facing our generation. It is a threat to both human and animal health and welfare, and we need sustainable, multisectoral approaches to address this critical issue.

As such, the Australian Veterinary Association (AVA) supports the intent and purpose of the draft consultation document “Australia’s Antimicrobial Resistance Strategy – 2020 and Beyond”, including the expansion of scope to include AMR in the environment, wildlife and food supply. The AVA supports the proposed overarching framework as outlined by ASTAG and shown in Figure 1 of the consultation document, as well as the vision, goal and objectives outlined in the document. Some specific comments on the objectives are provided below.

***Objective One: Increase awareness and understanding of antimicrobial resistance, its implications and actions to combat it, through effective communication, education and training.***

The AVA has provided information and materials to assist the development of the Australian Government’s One Health AMR website. The AVA participates in Antibiotic Awareness Week each year and provides educational material to veterinary practitioners and the general public around responsible use of antimicrobials. The AVA was part of the steering committee for the inaugural Australian Veterinary Antimicrobial Stewardship Conference (AVAMS) in 2018 and will continue to support this initiative in future years. The AVA provides continuing education to veterinarians in AMR and AMS, including lectures, printed materials and fact sheets on appropriate antimicrobial prescribing and infection prevention.

In 2017-18, the AVA conducted an Antimicrobial Stewardship Pilot Trial amongst veterinary hospitals in the ACT. This was a significant success, with participation in educational activities as well as self-assessment of antimicrobial usage, and the AVA would like to see Government funding support for this sort of initiative to be expanded to all veterinary practices and regions within Australia.

The AVA supports the proposed initiatives as described for the next strategy, in particular a communication strategy to reach target audiences in both the human and animal health sectors, and general public, to increase awareness of existing resources and amplify messaging around methods to combat development of AMR.

***Objective Two: Implement effective antimicrobial stewardship practices across human health and animal care settings to ensure the appropriate and judicious prescribing, dispensing and administering of antimicrobials***

As noted in the consultation document, the AVA has had a consistent role in development of materials to support good AMS in the animal care sector.

The AVA has participated in the process of national harmonisation of minimum veterinary prescribing and compounding regulatory requirements for veterinary practitioners treating livestock.

In 2019 the AVA and Animal Medicines Australia, with support from the Department of Agriculture and Water Resources, and Australian Pork Limited, published Antimicrobial prescribing guidelines for pigs (2019). A further 6 modules are under development: Antibiotic prescribing guidelines for poultry, sheep, dairy, beef, feedlot cattle, and horses, expected to be completed by mid-2020.

The AVA has released a number of factsheets for veterinarians on best practice antimicrobial prescribing.

In 2018 Animal Medicines Australia, in partnership with AVA, released fact sheets aimed at the public audience about responsible antibiotic use—one for companion animals and one for livestock and horses.

***Objective Three: Develop nationally coordinated One Health surveillance of antimicrobial resistance and antimicrobial usage.***

The AVA was involved in the development of the Australian Government's first [national strategy](#) to combat antimicrobial resistance, released in 2015 (the first strategy). One of the key objectives of the first strategy was "development of nationally coordinated One Health surveillance of antimicrobial resistance and antimicrobial usage". While this resulted in funding for a national surveillance system in the human health sector, there was no equivalent funding for a similar surveillance system for the veterinary health sector.

Without concurrent human and animal AMR research and surveillance in Australia we cannot fully understand the emerging threats. A centrally coordinated, systematic and ongoing veterinary antimicrobial usage and resistance surveillance system should be established for the animal health sector, and the AVA proposes that the Government should work with veterinary laboratories, universities and animal industries to establish such an initiative.

Note that it is essential that any antimicrobial usage metrics are appropriate to the specific drug and species being treated. Current usage is crudely assessed using sales figures from manufacturers (gross volumes of antibiotics). It is essential that new ways of measuring usage are developed which give meaningful information on species, dose rates, purpose of use, and any relevant AMR outcomes.

Recommendation: The establishment of a national veterinary antimicrobial usage and resistance surveillance system. This should mirror that which is used in the human health sector, to ensure synergies within a One Health framework.

***Objective Four: Improve infection prevention and control measures across human health and animal care settings to help prevent infections and the spread of resistance.***

As noted in the consultation document, the AVA has developed a range of guidelines with the latest information about biosecurity and infection prevention and control for veterinarians. The AVA supports proposed stocktake activities which would seek to document current IPC practices and improve awareness and implementation of best practice IPC resources.

***Objective Five: Agree a national research agenda and promote investment in the discovery and development of new products and approaches to prevent, detect and contain antimicrobial resistance***

As outlined in the consultation document, the Federal Government has allocated substantial funds to support research on AMR in the human health sector. Dedicated funding is also needed to support AMR research in the animal health sector. A number of initiatives have already been put in place through private efforts in the animal health sector, however significant investment is still needed from the Australian Government if we are to win the fight against AMR.

The AVA recommends that the Government should match funding provided for research into AMR in the human health sector, by funding the equivalent investment to support AMR research in animals.

***Objective Six: Strengthen international partnerships and collaboration on regional and global efforts to respond to antimicrobial resistance.***

The AVA supports this objective and the initiatives described to achieve this outcome.

***Objective Seven: Establish and support clear governance arrangements at the local, jurisdictional, national and international levels to ensure leadership, engagement and accountability for actions to combat antimicrobial resistance.***

The AVA supports this objective and the initiatives described to achieve this outcome. Review of ASTAG membership is supported, to include representation of food and environment, but also ensure a balance of human and animal health sector representation.

The Australian Veterinary Association is grateful for the opportunity to comment on the draft consultation document, and looks forward to another opportunity to contribute during the drafting phase of the new strategy.

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**Objective 1: Increase awareness and understanding of antimicrobial resistance, its implications and actions to combat it, through effective communication, education and training**

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy Objectives
<i>Priority Action Area 1.1 – Strengthen consumer awareness initiatives to improve understanding of antimicrobial resistance and the importance of using antibiotics appropriately</i>					
<i>Priority Action Area 1.2 – Increase support for human and animal health professionals in reinforcing key messages with patients and clients</i>					
<i>Priority Action Area 1.3 – Strengthen communication and education initiatives for health professionals and team members</i>					
Australian Veterinary Antimicrobial Stewardship Conference 2018			Inaugural conference Nov 2018		

**Objective 1: Increase awareness and understanding of antimicrobial resistance, its implications and actions to combat it, through effective communication, education and training**

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy Objectives
<i>Priority Action Area 1.4 – Develop a stakeholder engagement and communication plan to support whole-of-society awareness of, and participation in, implementation of the Strategy</i>					

**Objective 2:** Implement effective antimicrobial stewardship practices across human health and animal care settings to ensure the appropriate and judicious prescribing, dispensing and administering of antimicrobials

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy Objectives
<i>Priority Action Area 2.1 - Ensure that tailored, evidence-based antibiotic prescribing guidelines are available for all sectors</i>					
Development of veterinary antibiotic prescribing guidelines for livestock species and horses	Australian Veterinary Association and Animal Medicines Australia	<p>Zoetis Australia Pty Ltd – provided in-kind support in the form of the methodology used, and work on the Steering Committee.</p> <p>Boehringer Ingelheim Animal Health – provided in-kind support in the form of work on the Steering Committee.</p> <p>Australian Pork Limited – funding support.</p> <p>Department of Agriculture and Water Resources – funding support through the <i>Australian Biosecurity</i></p>	Pig guidelines complete. Poultry guidelines underway.	Contemporary, Australia-relevant, evidence-based prescribing guidelines will be available for Australian livestock and equine veterinary practitioners	

**Objective 2: Implement effective antimicrobial stewardship practices across human health and animal care settings to ensure the appropriate and judicious prescribing, dispensing and administering of antimicrobials**

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy Objectives
		<i>Response and Reform Program.</i>			

**Priority Action Area 2.2 – Ensure the availability of evidence-based, best practice and nationally consistent approaches to AMS across human health and animal health sectors**

AMA & AVA Fact sheets	AMA and AVA		Completed	Consumer awareness (companion animals, livestock and horses)	
AVA Fact Sheet: <a href="#">Veterinary Use of Antibiotics Highly Important to Human Health</a>	AVA		Updated 2017	Veterinary awareness	
AVA policy <a href="#">“Use of antimicrobial drugs in veterinary practice”</a>	AVA		Updated 2018. Includes AMS Key Principles	Veterinary awareness of good AMS principles	

**Priority Action Area 2.3 – Develop tailored, evidence-based resources to support the implementation of AMS programmes**

**Objective 2: Implement effective antimicrobial stewardship practices across human health and animal care settings to ensure the appropriate and judicious prescribing, dispensing and administering of antimicrobials**

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy Objectives
<i>Priority Action Area 2.4 – Review existing accreditation and quality assurance programmes to ensure they appropriately support and encourage compliance with best practice AMS approaches</i>					
<i>Priority Action Area 2.5 – Strengthen existing measures to better support appropriate and judicious use of antibiotics</i>					

**Objective 3: Develop nationally coordinated One Health surveillance of antimicrobial resistance and antimicrobial usage**

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy Objectives
<i>Priority Action Area 3.1 – Establish the foundations for national One Health Surveillance</i>					
<i>Priority Action Area 3.2 – Agree the objectives of surveillance for each sector, ensuring they align with the overarching objectives for the national One Health surveillance system</i>					
<i>Priority Action Area 3.3 – Develop lists of priority organisms and associated antimicrobials for national reporting</i>					
<i>Priority Action Area 3.4 – Agree and implement a uniform standard for laboratory testing methods for resistance susceptibility</i>					
<i>Priority Action Area 3.5 – Improve human health surveillance</i>					

**Objective 3: Develop nationally coordinated One Health surveillance of antimicrobial resistance and antimicrobial usage**

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy Objectives
<i>Priority Action Area 3.6 – Improve animal health and agriculture surveillance</i>					
<i>Priority Action Area 3.7 - Investigate requirements for surveillance in food</i>					

**Objective 4:** Improve infection prevention and control measures across human health and animal care settings to help prevent infections and the spread of resistance

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy Objectives
<i>Priority Action Area 4.1 – Ensure availability of evidence-based, best-practice and nationally consistent standards for IPC across human health and animal care settings</i>					
AVA IPC Guidelines “Guidelines for veterinary personal biosecurity”  PPE for equine veterinarians:  See: <a href="https://www.ava.com.au/library-resources/other-resources/veterinary-personal-biosecurity/">https://www.ava.com.au/library-resources/other-resources/veterinary-personal-biosecurity/</a>	AVA				
<i>Priority Action Area 4.2 - Review existing accreditation and quality assurance programmes to ensure they appropriately support and encourage compliance with best practice IPC measures</i>					

**Objective 4: Improve infection prevention and control measures across human health and animal care settings to help prevent infections and the spread of resistance**

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy Objectives
<i>Priority Action Area 4.3 - Develop additional initiatives and resources to strengthen IPC in all human health care settings</i>					
<i>Priority Action Area 4.4 - Further develop initiatives and resources to strengthen IPC in the livestock industry</i>					
AVA <a href="#">BioCheck</a> program	Australian Cattle Vets	AVA	Released	Improved biosecurity and infection prevention in livestock enterprises	
<i>Priority Action Area 4.5 - Further develop resources to strengthen IPC in veterinary practice</i>					
<i>Priority Action Area 4.6 – Encourage continued increases in vaccination rates to prevent infections</i>					

**Objective 5:** Agree a national research agenda and promote investment in the discovery and development of new products and approaches to prevent, detect and contain antimicrobial resistance

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy objectives
<i>Priority Action Area 5.1 - Identify current gaps and agree national research and development priorities</i>					
<i>Priority Action Area 5.2 – Coordinate national research activities and the sharing of information</i>					
<i>Priority Action Area 5.3 – Explore opportunities to increase support for research and development, including incentives for greater private sector engagement</i>					

**Objective 5: Agree a national research agenda and promote investment in the discovery and development of new products and approaches to prevent, detect and contain antimicrobial resistance**

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy objectives
<i>Priority Action Area 5.4 – Explore opportunities to support the translation of promising research findings into new products, policies and approaches</i>					

**Objective 6:** Strengthen international partnerships and collaboration on regional and global efforts to respond to antimicrobial resistance

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy objectives
<i>Priority Action Area 6.1 – Active engagement with multilateral organisations and relevant forums to contribute to global action on antimicrobial resistance</i>					
<i>Priority Action Area 6.2 – Lead regional initiatives to increase capacity to respond to antimicrobial resistance</i>					
<i>Priority Action Area 6.3 – Learn from international best practice</i>					
<i>Priority Action Area 6.4 – Participate in international surveillance initiatives</i>					

**Objective 6: Strengthen international partnerships and collaboration on regional and global efforts to respond to antimicrobial resistance**

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy objectives
<i>Priority Action Area 6.5 – Establish closer ties with international collaborations to link Australia’s national research agenda with what is happening internationally</i>					

**Objective 7:** Establish and support clear governance arrangements at the local, jurisdictional, national and international levels to ensure leadership, engagement and accountability for actions to combat antimicrobial resistance

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy objectives
<i>Priority Action Area 7.1 – Identify, establish and maintain linkages between implementation partners across all sectors</i>					
<i>Priority Action Area 7.2 – Work with stakeholders to develop an Implementation Plan for the Strategy</i>					
<i>Priority Action Area 7.3 – Establish baseline measures to inform monitoring and evaluation of the Strategy</i>					
<i>Priority Action Area 7.4 – Review regulation (legislated and other) relevant to antimicrobial resistance and antibiotic usage</i>					

**Objective 7:** Establish and support clear governance arrangements at the local, jurisdictional, national and international levels to ensure leadership, engagement and accountability for actions to combat antimicrobial resistance

Activity	Responsibility – Lead	Key partners (include role)	Milestones	Expected Outcome/s	Links with other Strategy objectives