Europe IFAH
Representing the European Animal Health Industry

ESVAC Stakeholder Meeting

3rd March 2015

- Very little time to comment on a complex document
- These are not final IFAH-Europe positions but elements of discussion.

Ideal system

- Simple
- Should reflect actual use as much as possible
- Difference in measurement reflect difference in use
- Should not lead to disruption of the therapeutic choice normally based on benefit/risk balance for the patient

Calculation of DDDa and DCDa

- Agree with exclusion of outliers
  - Given the fact that they are arithmetic means
- Given any thought to geometric means ?
  - Mode ?
  - Weighted averages based on volumes ?

- Whatever solution is retained, we support a measurement that is as closed to reality as possible

The problem of combinations

- We are still concerned on the divergence with ESAC regarding the double counting of combinations
- We do however look forward to potential exceptions when combinations are synergistic
  - what will be the criteria for synergistic combinations? (line 382)
  - More than just TMP Sulfa ?
- Artificial impact on product prescription?

Proposed rules

- Different criteria for injectable vs oral
  - YES
- Different criteria for prodrugs
  - Reserved opinion
- Same criteria for all oral forms
  - NO
- Same criteria for long acting / vs daily injectables
  - YES

Proposed rules

- Same criteria for active in combination and single
  - YES
- Different criteria for sulfonamide synergistic products
  - YES
  - What about other synergistic combinations?

Other points

- DCDs vs DDDs
  - IFAH-Europe still maintains that DCDs would better capture exposure than DDDs
  - DCDs avoid determining prescription based consumption management only
  - i.e. long acting
- Comparison with humans
  - We still do not see the scientific value of comparing DDDs in humans and animals
  - Who compares DDDs in hospitals to DDDs in primary care ?

Other challenges

- Use of multi-species products on multi-species farms
- Potential cascade issues?

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Thank You!

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