



EUROPEAN MEDICINES AGENCY  
SCIENCE MEDICINES HEALTH

Copenhagen April 26<sup>th</sup>, 2022

## Submission of comments on 'draft reflection paper on the prophylactic use of antimicrobials in animals' (EMA/.../...)

### Comments from: Danish Veterinary Association (DVA)

Name of organisation or individual

The Danish Veterinary Association would like to provide the following comments to the "reflection paper on the prophylactic use of antimicrobials in animals". (See page 2: General comments)

Kind regards,

The Danish Veterinary Association

*Please note that these comments and the identity of the sender will be published unless a specific justified objection is received.*

*When completed, this form should be sent to the European Medicines Agency electronically, in Word format (not PDF).*

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## 1. General comments

Stakeholder number	General comment (if any)	Outcome (if applicable)
<i>(To be completed by the Agency)</i>		<i>(To be completed by the Agency)</i>

The possibility of prophylactic treatment with coccidiostats is imperative for the pig production to combat poor growth and health in piglets. The use of coccidiostats should be part of a preventative strategy which also contains a strong focus on hygienic measures to minimize the infective burden. However, even in stables with a high hygienic standard, the prophylactic use of coccidiostats will be necessary.

If prophylactic treatment of a group of animals is not permitted, it will have the following consequences for the production animal industry.

- 1) Preventative treatment of animals for export to third countries i.e., animals for breeding, is often required by the receiving country. A total ban would therefore have great consequences for export to third countries.
- 2) Medicinal eradication of disease where an entire site is treated, including animals without clinical symptoms but who could be chronic carriers of the pathogen after having had the disease earlier in life. The Danish pig sector has used this strategy with success to eradicate for example *Mycoplasma hyopneumoniae* and *Actinobacillus pleuropneumoniae* to allow the site to re-enter the SPF system. Banning such a strategy would have grave consequences for the Danish pig sector.

## 2. Specific comments on text

Line number(s) of the relevant text <i>(e.g. Lines 20-23)</i>	Stakeholder number <i>(To be completed by the Agency)</i>	Comment and rationale; proposed changes <i>(If changes to the wording are suggested, they should be highlighted using 'track changes')</i>	Outcome <i>(To be completed by the Agency)</i>
		Comment:  Proposed change (if any):	
		Comment:  Proposed change (if any):	
		Comment:  Proposed change (if any):	

Please add more rows if needed.