Colistin Issue เอกสารหมายเลข 1

Our related product of colistin combination is **"POTENCIL" Reg.no. 2F 15/39**

Below is a summary of the situation related to colistin in France and Europe.

France:

- **Colistin** not classified as "critical". The ANSES (French Veterinary Agency) proposes to defend a third path between "critical AB" and "non-critical AB". Indeed ANSES took into account that the risk to classify colistin as "critical"l is the report / pressure of use on other AB categories for which the resistance risk and importance for human health are higher than those related to colistin.

So ANSES took several measures to reinforce the surveillance of colistin use but without classifying it as "critical" .

- **Veterinary drugs containing colistin:**

Two major consequences on French Marketing authorizations following the recommendations at the European level from the CVMP (Committee for Medicinal Products for Veterinary Use)

1) restriction of use for oral drug containing only colistin to treatment only (withdrawal of preventive indications) and duration of treatment limited to 7 days.
2) Withdrawal of marketing authorizations of oral drug containing colistin in combination with another AB.

=> Therefore Potencil is out of the scope of these decisions.
Indeed, it is important to note that the above restrictions or withdrawal are only related to **oral dosage forms**. They do not involve non-oral colistin formulations (injectable, intrammary, topical).

Europe.

- **Colistin** has been classified in category 2 from the AMEG classification (AntiMicrobial ad hoc advice Expert Group): "antibiotics used in veterinary medicine where the risk for public health is considered as high"
- **Veterinary drug containing colistin:**

CVMP recommendations
1) In December 2014 the CVMP recommended to restrict the indications for use of colistin **by oral route** 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. I. Commission Decision (2015)1916 of 16 March 2015 translated the CVMP recommendation into legislation.

2) In April 2016 the CVMP recommended the withdrawal of the marketing authorisations for all veterinary medicinal products for oral use containing colistin in combination with other antimicrobial substances.

Attachments:

Position adopted by CVMP on Colistin use:

Comments received:

Extract of comments supported by Virbac: These extracts are from the 2 EMA documents above. The most important point is the first one that Virbac reproduce below.
It explains that though colistin is classified in category 2, non oral routes of administration are at much lesser risk due to marginal use compared to oral route, individual usage (vs collective use for oral route) and no impact on animal gut flora. The details are explained in the extracts (comments from Virbac and answers from EMA).

1.5. Injectable, intramammary and topical formulations

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 considered that although colistin should be in Category 2, further restrictions on the use of these colistin formulations would not have a major impact on the risk to public health. If in the future it is apparent the sales of these formulations are increasing, then the possibility of the restrictions of the use should be reconsidered.