



New regulations on farm antibiotics for Great Britain and how they compare to the regulations in the European Union

On 17 May 2024, new Veterinary Medicines Regulations (VMR) were introduced which restrict the use of antibiotics in livestock, in England, Scotland and Wales¹. The new VMR contain some very welcome measures, aimed at reducing or eliminating antibiotic overuse in farming.

The new British rules are based on regulations the European Union (EU) introduced over two years earlier, on 28 January 2022². Unfortunately, despite the British government having previously said that it intended to align with the EU legislation³, some very important aspects of the EU regulations have been dropped.

In particular, the UK government has refused to implement a full ban on using antibiotics prophylactically (preventatively) on groups of animals and has also failed to introduce mandatory antibiotic-use data collection.

The key measures introduced by the new VMR for Great Britain include:

- **Antibiotics may not be “used routinely”.**
- **Antibiotics may not be “used to compensate for poor hygiene, inadequate animal husbandry, or poor farm management practices”.**
- **Antibiotics may only be prescribed for prophylactic purposes “in exceptional circumstances where the risk of an infection or of an infectious disease is very high and where the consequences of not prescribing the product are likely to be severe”.**
- **The use of antibiotics for group prophylaxis will only be allowed when:**
 - (a) **the rationale for prescribing the product to the group of animals is clearly recorded by the veterinary surgeon prescribing it.**
 - (b) **a management review is carried out by a veterinary surgeon at, or as soon as reasonably practicable after, administration of the product in order to identify factors and implement measures for the purpose of eliminating the need for any future such administration.**

While the above new rules represent significant improvements in the regulation of farm antibiotic use, the British regulations remain far weaker than those which apply in the EU.

Important measures in the EU’s regulations, but not in the British regulations include:

- **Antibiotics may not be used for group prophylaxis: “prophylaxis shall be limited to the administration to an individual animal only”.**
- **A specific restriction is included on metaphylaxis (the treatment of a group of animals where some of the animals are diagnosed as sick): “Antimicrobial medicinal products shall be used for metaphylaxis only when the risk of spread of an infection or of an infectious disease in the group of animals is high and where no other appropriate alternatives are available”.**



- **Animal produce imported into the EU must not have been produced with the use of antibiotics for growth promotion. This restriction will come into effect on 3 September 2026⁴.**
- **Member States are required to collect mandatory antibiotic-use data by farm-animal species. Data collection began in 2023 and will be phased in over several years. In 2024, Member States must report their usage data for beef cattle, dairy cattle, pigs, chickens (broiler chickens and laying hens being reported separately) and turkeys to the European Medicine Agency (EMA). In March 2025, the EMA will publish the first annual report containing antibiotic use data by animal species⁵. From 2027, reporting of usage in other food animals (e.g. sheep, goats, fish, rabbits and horses) begins.**
- **Antibiotic products included in animal feed cannot be used for longer than the duration indicated on the label of the antibiotic product, and where no maximum duration is indicated on the label, use is limited to two weeks at most.**
- **No more than one antibiotic product can be included in animal feed at a time.**

In addition to being disappointed at many important EU regulations being dropped, the Alliance to Save Our Antibiotics is concerned that some the key rules being introduced may not be properly implemented. In particular, the Alliance is concerned the rule stating that antibiotics should not be “used to compensate for poor hygiene, inadequate animal husbandry, or poor farm management practices” may not be strictly adhered to.

One reason for this concern is the justification Defra and the government’s Veterinary Medicines Directorate have given for their decision to allow group prophylaxis with antibiotics to continue. They said:

“We are not proposing a full, blanket ban on group prophylactic use as, if there is an infection or infectious disease on the farm, making improvements to farm infrastructure and management practices to reduce or eliminate this can take time. Banning group prophylaxis while these changes are being implemented could be harmful to animal welfare (as you would need to wait until some animals become clinically ill before treating) and increase the risk of the disease spreading (which would subsequently require higher antibiotic use and thus increase the risk of AMR developing)”⁶.

This statement suggests that farms that have poor farm management practices, resulting in infections being present on the farm, will be allowed to use antibiotics prophylactically in groups of animals, despite the law stating that antibiotics cannot be used to compensate for poor farm management.

Furthermore, when asked to clarify what “exceptional circumstances” would permit the use of prophylactic antibiotics, Sir Mark Spencer MP, the Minister for Food, Farming and Fisheries, said prophylactic use “would be permitted only where there would be a risk of infection or severe consequences if antibiotics were not applied”⁷. This suggests that prophylactic use could still occur quite frequently, since when animals are kept in highly intensive conditions, there is often



a significant risk of infection. If the risk of disease occurring in intensive farming is viewed as being an exceptional circumstance, then prophylactic antibiotic use could effectively continue as before.

Overall, the new VMR are a significant step in the right direction towards more responsible farm antibiotic use in Great Britain. However, the Alliance to Save Our Antibiotics believes that the regulations still need to be improved so that they are at least as strong as the EU's.

In particular, the Alliance to Save our Antibiotics is calling for:

- **A ban on all preventative group treatments with antibiotics.**
- **Mandatory antibiotic-use data collection by animal species. The government should also publish this data by farming system (e.g. indoor, free-range, organic, pasture-fed).**
- **A ban the importation of animal foods produced with antibiotic growth promoters.**
- **A target to reduce farm antibiotic use by 40% by 2030. Antibiotic use in 2022 was 25.7 mg of antibiotic per “population correction unit” (PCU)⁸. This should be reduced to 15 mg/PCU in 2030.**
- **A target to reduce group treatments with antibiotics to 30% of farm antibiotic use by 2030. In 2022, group treatments accounted for about 75% of farm antibiotic use⁸.**
- **Major improvements to minimum animal-husbandry standards to achieve higher levels of animal health and welfare, so that the need for antibiotics is minimised.**

References

¹ The Veterinary Medicines (Amendment etc.) Regulations 2024, <https://www.legislation.gov.uk/ukxi/2024/567/contents/made>

² Regulation (EU) 2019/6 of the European Parliament and of the Council of 11 December 2018 on veterinary medicinal products and repealing Directive 2001/82/EC, <https://eur-lex.europa.eu/eli/reg/2019/6/oj>

³ The government stated that “Aligning with EU legislation, we will implement the provisions of the new EU Veterinary Medicines legislation on the use of antibiotics, subject to the official public consultation process and through collaboration with stakeholders to agree how it can be applied in Practice” in HM Government, Tackling antimicrobial resistance 2019–2024, The UK’s five-year national action plan, https://assets.publishing.service.gov.uk/media/6261392d8fa8f523bf22ab9e/UK_AMR_5_year_national_action_plan.pdf

⁴ COMMISSION IMPLEMENTING REGULATION (EU) 2024/399 of 29 January 2024, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202400399

⁵ European Medicine Agency, Antimicrobial Sales and Use Platform, <https://www.ema.europa.eu/en/veterinary-regulatory-overview/antimicrobial-resistance-veterinary-medicine/antimicrobial-sales-use-platform>

⁶ Veterinary Medicines Directorate and Department for Environment, Food and Rural Affairs, 2023. Review of the Veterinary Medicines Regulations 2013 A public consultation, https://consult.defra.gov.uk/vmd/review-of-the-veterinary-medicines-regulations-201/supporting_documents/VMR_2023_Consultation_document_for_VMR_amendments%20version%201.1.pdf

⁷ Draft Veterinary Medicines (Amendment etc.) Regulations 2024 Debated on Tuesday 23 April 2024, [https://hansard.parliament.uk/Commons/2024-04-23/debates/3c956a35-3301-4f9e-bfce-c695599b8a4c/DraftVeterinaryMedicines\(AmendmentEtc\)Regulations2024?highlight=antibiotic#contribution-15262F37-E382-4BAE-8C64-C3901D70E596](https://hansard.parliament.uk/Commons/2024-04-23/debates/3c956a35-3301-4f9e-bfce-c695599b8a4c/DraftVeterinaryMedicines(AmendmentEtc)Regulations2024?highlight=antibiotic#contribution-15262F37-E382-4BAE-8C64-C3901D70E596)

⁸ Veterinary Medicines Directorate, 2023. UK Veterinary Antibiotic Resistance and Sales Surveillance Report UK-VARSS 2022, <https://www.gov.uk/government/publications/veterinary-antimicrobial-resistance-and-sales-surveillance-2022>