AnimalhealthEurope discussion paper in preparation of *Farm to Fork* proposal

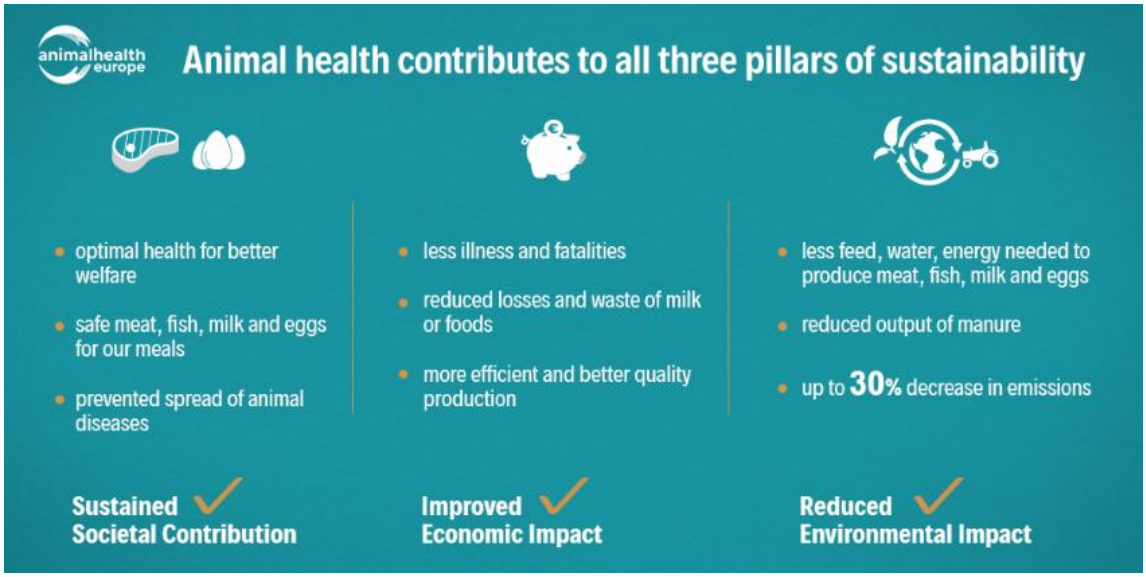
AnimalhealthEurope is the association representing manufacturers of animal medicines, vaccines and other animal health products in Europe. A not-for-profit body representing both corporate members and national animal health associations in Europe, we represent both innovators and generics alike, as well as large, medium-sized and small companies. Our membership covers 90% of the European market for animal health products.
We are the voice of the animal medicines industry.

We take this opportunity to share with you some key points for consideration pertaining to animal health in your preparations for a new Farm to Fork strategy. We fully support the ambition of the Commission to move towards an EU sustainable food system, with a transformation based on innovative and enabling technologies, such as digital tools, and practices while respecting biodiversity. We, the animal health industry would like to share with you a range of solutions and directions that can help meet the objectives of such transformation. We also believe that innovation in animal health must be supported in order to provide farmers and vets with the necessary tools to respond rapidly to disease outbreaks.

Towards a sustainable food system for the EU – the role of healthy animals and the animal medicines sector

- FAO stats[i] show that since the 1960s there has been a 51% drop in emissions from livestock thanks to a shift to more specialised livestock systems. FAO also indicates that a further 30% reduction can be made through improved animal management[ii].
- With the help of animal medicines, Europe has been successful in preventing and managing animal diseases such as Bluetongue, Circovirus, and Foot-and-Mouth disease, which previously posed serious threats to animal health, food safety and public health.
- Since 2011, overall sales of antibiotics for animal health purposes have decreased by 32% in 25 of the 31 countries in the ESVAC network, according to the EMA[iii].
- 70% of land used by livestock cannot be used for crops. These areas, which are particularly grasslands, have many environmental advantages. They are reservoirs of biodiversity, protect soils from erosion, filter water and store carbon.[iv]
- Livestock consume 6 billion tonnes of dry matter, of which 86% are non-edible as human food.[v]
- The livestock sector contributes substantially to the European economy (€168 billion annually, 45% of the total agricultural activity) and creates direct jobs for 4 million people and indirectly supports the work of 30 million people, mostly in rural areas. European industries linked to animal production (milk and meat processing, feed for livestock) have an annual turnover of approximately €400 billion. Future livestock production could in fact contribute greatly to the circular economy or digital industry, creating new European economic champions.[vi]
- Meat, milk, fish and eggs provide the nine essential amino acids, iron (especially red meat), zinc, calcium (dairy products), vitamins A, B3, B6, D, and the omega-3 fatty acids EPA and DHA (fatty fish) and they are the only sources of vitamin B12.

These facts demonstrate that healthy animals play an essential role in a food production system capable of supplying safe, affordable and high-quality food for our growing population, with a reduced impact on the environment.



Any food production system aiming to be sustainable must also take due account of the tools needed to rear animals well in order to provide safe, nutritious and affordable food. Be it to detect, prevent or cure disease the animal health industry contributes to a sustainable future through the provision of innovative vaccines, diagnostic tools, parasite prevention, monitoring solutions and treatments, etc.

1. Animal health and welfare

How we can contribute: Animals, just like people get sick and require medicines. The animal health industry is driving advances in animal health and well-being that make it possible to sustainably raise healthy livestock. Animal health and welfare constitute a key component for the two interdependent elements: sustainable livestock farming and sustainable food production. Animal health is a prerequisite for maintaining good animal welfare.
The animal health industry is ready to offer new solutions through forward-looking innovations intent on reducing animal pain and illness, as well as the number of animals and food products lost to health threats. In addition to new technologies, the vet toolbox should remain well-equipped with a range of solutions, including vaccines, anti-parasiticides, and anti-inflammatory treatments, etc. We also contribute to animal health and animal wellbeing by providing practical advice, educational material or platforms to exchange innovative ideas. Together this contributes not only to better animal welfare but it also ensures optimal use of natural resource input and less waste output, minimising the impact on the environment.

Our ask: As 20% of farm animals are lost to animal disease[vii], and as a consequence cannot enter our food chain, we look to the new Farm to Fork policy to future-proof our new approach to agricultural production. This can start with support measures, e.g. demonstration projects illustrating the benefits thereof, and research projects for new or upcoming technologies and tools that can prevent animal diseases and improve animal welfare.

2. Disease prevention

How we can contribute: Supporting farmers with the means for good hygiene and biosecurity serve as a first step in avoiding exposure to infection. Disease prevention is greatly enhanced through the provision of high quality, effective vaccines. When farmers take preventive measures such as vaccination and biosecurity, this makes for efficient farm management from an animal welfare perspective, an economic perspective and an environmental perspective. Protecting animals from disease also prevents transmission and slows further spread.

Our ask: Working together, industry and authorities can respond rapidly to halt or slow transmission of existing and newly emerging diseases through the establishment of vaccine banks and/or fast-tracking approvals of vaccines in the case of disease outbreaks. Prioritising investment at national and European level in innovative early research through funding programmes such as Horizon Europe can also support much-needed R&D to develop new generations of vaccines and other therapies for both animal and human health.

3. Disease detection and preparedness

How we can contribute: Digital monitoring tools allow for real-time surveillance of the animal's physical status improving the vet and farmer's ability to protect against disease, advance the well-being of farm animals and support sustainable livestock production. Application of these innovative solutions mean that the farmer can also easily detect signs of illness allowing for a more targeted use of treatment options. New technologies continue to be developed which allow for rapid, on-farm diagnosis of important diseases, Laboratory expertise and capabilities to investigate more complex clinical cases will remain essential.

Our ask: It is essential that new technologies are widely accepted and that sufficient means are dedicated to ensuring that farmers are equipped with the tools that facilitate their work while supporting animal well-being, and that farmers are given adequate training on their use. The new policy should therefore promote those tools and also support farmers to make the transition, allowing them to make full use of this wide range of capabilities.

Examples of Innovations in Animal Health	
Precision Livestock Farming (PLF)	*Numerous technologies including: genomics, diagnostics, sensors, amongst others. Precision livestock technology helps to ensure a more sustainable animal production. The animal health industry offers and continues to work on a broad range of animal health solutions to enhance animal health and well-being as well as productivity.*
Sensors	*Devices attached to the animal which monitor e.g. a behavioural, sensory or physiological output, for example activity, location or rumination. Benefits can include e.g. improved treatment efficacy due to earlier disease detection leading to a reduced need of antimicrobial use and better animal welfare outcomes.*
Genomic predictions	*Genomic predictions which is derived from testing allows farmers to make selection decisions earlier in the lifetime of an animal. Improvements can, among others, result in healthier animals, improved animal welfare, reduced treatments, and labour efficiency.*
Diagnostics	*New technologies continue to be developed which allow for rapid, on-farm diagnosis of important diseases, such as mastitis, the most economically important dairy disease. Laboratory expertise and capabilities to investigate more complex clinical cases will remain essential.*

4. Responsible use of antibiotics

For the past two decades, EU agriculture has steadily and successfully adopted an approach toward the responsible use of antibiotics, keeping at the forefront the primary goal of protecting animal health and welfare. From the 2006 ban on the use of antibiotic growth promotors to further restrictions on the use of antibiotics taken up in Regulation 2019/6, the use of antibiotics is limited to circumstances where there is a demonstrative veterinary need to safeguard an animal's health and welfare.

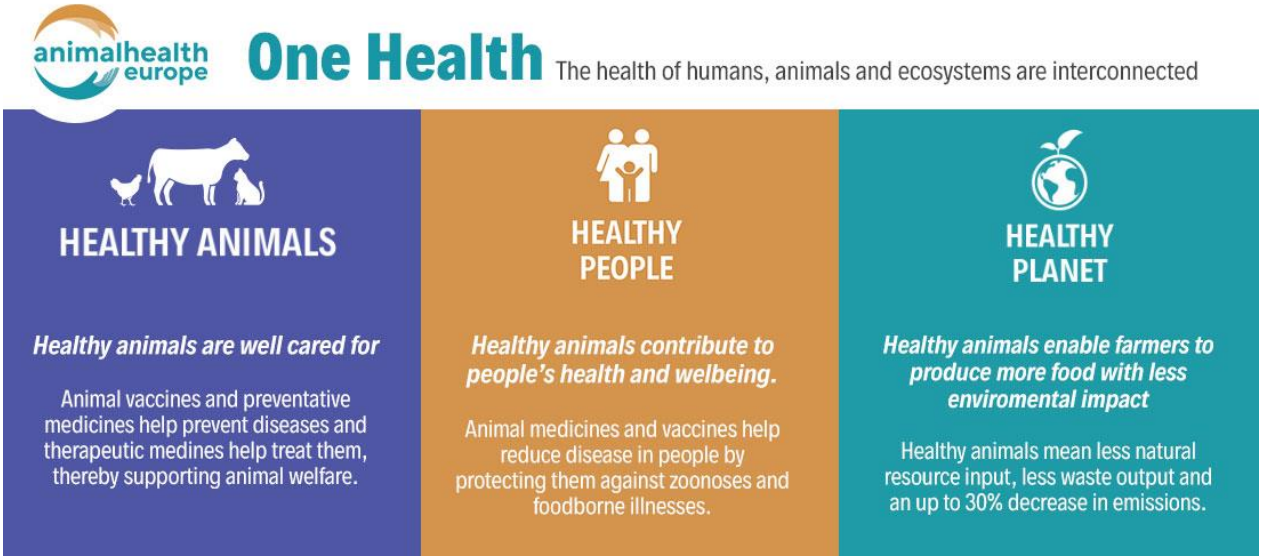
How we can contribute: For the past two decades, AnimalhealthEurope and its membership have been proactively leading the charge against the challenge of antibiotic resistance development on a number of different levels, from providing input into policy tools, to promoting responsible veterinary and animal health practices, monitoring antimicrobial sensitivity (*CEESA data*), ensuring transparency on sales of antibiotics (ESVAC), and awareness-raising activities through the establishment of the European Platform for the Responsible Use of Medicines in Animals (EPRUMA). In 2019 we also committed on a global level to measurable actions to improve the three areas of our vision for responsible use: prevention, detection, and treatment.

Our ask: The new Regulation on Veterinary Medicines provides measures to reduce the need for antibiotic use to a minimum. It is essential that the success of this new Regulation be evaluated prior to any further legislative measure being added beyond the outstanding implementing measures. These measures should also consider the impact on animal health and wellbeing, as well as the impact of such restrictions on public health.
With national One Health action plans under implementation, a continued and steady decrease in the use of antibiotics in agriculture recorded across the Union, and the upcoming implementation of the new Regulation, we strongly oppose the imposition of absolute reduction targets which would place at risk animals in need of antibiotic treatment. Particular care should be taken even with the setting of aspirational goals for reducing use of antibiotics as bacterial diseases must be treated efficiently in order to ensure animal health and welfare.

5. One Health

How we can contribute: With surges in the global population and the consequent demand for food, people and animals co-exist in closer proximity. Increased trade and climate change also enhance the transmission of vector-borne diseases and new zoonoses unfamiliar to Europe. By providing innovative tools to prevent new and emerging diseases we can help to reduce infections in animals, improve food safety, and food yields. In short: **Healthy animals mean healthy people and a healthier planet.**

Our ask: As mentioned by the WHO, food safety is an area of work in which the *One Health approach* is particularly relevant. We take this opportunity to reiterate our long-standing call for the creation of a One Health platform for stakeholders, running in parallel to the EU One Health Platform for Member States, to further our progress in this joint approach.



6. Farming and dietary preferences

How we can contribute: Animal health and welfare is paramount in all types of farming. If sustainable food production is to be the main objective, the Farm to Fork strategy must support the different farming systems which are capable of adapting to both climate change and guaranteeing food security while ensuring full access to the animal health solutions available to prevent and treat animal diseases where possible. Through the provision of these solutions the animal health industry makes an important contribution both to Europe's rural areas but also to global sustainability, particularly in those areas of the world that depend heavily on animals for their livelihood. A sustainable food supply is essential for feeding a growing world population, and our disease prevention tools and therapies help to make this a reality through a safe and secure supply of animal proteins.

Our ask: We encourage the European Commission to gather evidence-based and fact-checked information It is essential that the consumer has access to such information in a clear way, so that the consumer can make an informed decision on his/her food preferences. We ask the Commission to stimulate the use of modern digital tools to inform the consumers.

If animal welfare labelling of food products is considered by the European Commission, it is important to consider that animal health is the main precursor to animal welfare.
Meat, milk, fish and eggs make important contributions to global calorie and protein supplies and can be an important source of essential micronutrients in the human diet. They also play an important role in many European cultures and food traditions so their presence in our diets should not be discouraged.
Education on animal health and responsible use of medicines, standards for safe medicines as well as access to high quality products should be supported and accessible to citizens.

[i] http://www.fao.org/faostat/en/#data/EI/visualize

[ii] http://www.fao.org/news/story/en/item/197623/icode/
[iii] https://www.ema.europa.eu/en/documents/leaflet/responsible-use-antibiotics-protects-animals-people-2011-2017-sales-antibiotics-veterinary-use-are_en.pdf
[iv] *Hocquette, Mollier, Darmon, Peyraud, 2019*
[v] *Mottet et al., 2018*
[vi] *Hocquette, Mollier, Darmon, Peyraud, 2019*
[vii] OIE, 2015, *https://www.oie.int/fileadmin/Home/eng/Media_Center/docs/pdf/Key_Documents/ANIMAL-HEALTH-EN-FINAL.pdf*