Veterinary Products Committee

Published minutes

A summary of the minutes of the Veterinary Products Committee Meeting held on 6 October 2022 at the VMD, Woodham Lane, New Haw, Addlestone, Surrey.

Chairman – Professor Malcolm Bennett BVSc, PhD, MRCVS, FRCPath, FHEA
Secretary – Chris Abbott

Members

Mrs H Ballantyne
Dr R Bennett
Dr M Bowen
Dr Y Chang
Mr M Clark
Mr M Jelley
Mrs F Kidd
Dr D Killick
Dr E Kubiak
Dr D Mackay
Mr R Soutar
Mr J Statham
Ms A Tarr
Mr E Vega
Prof J Weeks

Officials: may be present for all or part of the meeting or for specific agenda items.

VMD

Mr G Hall
Mr M Escribano
Dr R Cooney
Dr G Clarke
Mr N Acharyya
Ms A Burrows

Other

Prof M Clokie (University of Leicester)
Dr A Thanki (University of Leicester)
Ms K Foxall (UKHSA)

Apologies

Dr K Ganapathy
Mr M White

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1. Announcements and apologies for absence

1.1 The Chairman reminded Members and Officials that all papers, unless otherwise indicated, and discussions of the committee are confidential. No information relating to the proceedings of the committee or papers presented to the committee may be divulged to any third party.

1.2 Apologies for absence had been received from Dr Ganapathy and Mr White. The Chairman welcomed Professor Martha Clokie and Dr Anisha Thanki from the University of Leicester who had been invited to the committee to talk about bacteriophages.

2. Declaration of interests

2.1 The Chairman reminded Members of the procedure for declaring interests at VPC meetings. No interests were declared.

3. Presentation: Current Status and Future Prospects of Phage Applications in Animals

3.1 Professor Clokie explained that antimicrobial resistant bacteria are a major and increasing risk to animal and human health. Bacteriophages (phages) are viruses of bacteria and through their killing of bacteria have huge potential as therapeutics and biocides. There is a huge diversity of phages, many of which are highly specific to particular bacteria, providing the potential to target pathogens without affecting commensal bacteria. Several, mainly small, innovative companies have developed products for use on, for example, foodstuffs or in the environment, while trials have been undertaken on their use as treatments in animals and humans. The advantages of phages for therapy are that they already exist in nature and can be used against – indeed can be targeted at – antibiotic resistant bacteria. The disadvantages are that they can be difficult to characterise, require 'cocktails' to reduce the risk of bacterial resistance, and are therefore difficult to regulate. However, they have been recognised as generally safe by the FDA for treating food and are already used in agriculture and aquaculture in China and South Korea. In Europe, new phage products are about to be accepted for registration as feed additives by EFSA.

3.2 Professor Cloke used as an example of their therapeutic potential, the results of trials at Leicester University, which involved the creation of a cocktail of phages that infect multiple salmonella strains and showed its effectiveness against infection in chickens.

3.3 Phages have the potential to be authorised as feed additives or veterinary medicinal products, although the latter requires production to meet GMP standards which could be prohibitively expensive. Professor Clokie suggested that a group of government and phage experts working together could solve this. Developing the use of phages intersects well with UK AMR policy on reducing the use of antimicrobials and the VMD, as a global reference centre for AMR, is well placed for rolling this out internationally.

3.4 In response to questions from members, Professor Clokie informed them that resistance to phage cocktails has not been detected, albeit in relatively short-term experiments, that they appear safer for the environment and lower doses can be more effective for reasons that were not entirely understood yet but probably include their ability to grow in the infected host. They may also be better suited for prophylactic use and acute treatment than chronic treatment.

3.5 VMD's Head of Biologicals, Dr Rory Cooney, presented the regulatory framework and guidance in place for dealing with bacteriophages. In common with most other international veterinary regulatory authorities, there is currently no specific UK legislation or guidance on regulation of bacteriophage VMPs and requirements. They are considered borderline products and may be classed as VMPs, feed additives or biocides which fall under the responsibility of different regulatory bodies. They are dealt with on a case-by-case basis and

there is a need for collaborative process between relevant UK agencies towards a harmonised approach to classification. There are many aspects of bacteriophage VMPs which mean that they do not fit easily into current existing regulatory frameworks, including the use of phage cocktails and the need to update their composition on an ongoing basis.

3.6 One of the goals of VMD's Regulatory Science Strategy is to enable access to novel therapies and techniques by evaluating them using appropriate benefit-risk assessments and ensuring there is a clear regulatory path to market. VMD will support companies to better understand data requirements and provide guidance within the regulatory framework and is committed to identifying strategies that will increase the development, availability and use of alternatives to antimicrobials. The Veterinary Medicines Regulations are due for public consultation later this year and VMD will be proposing a non-descriptive approach to regulating novel products which will highlight the need to address specific concerns. Currently no bacteriophage VMP is authorised nationally or internationally and the UK regulatory framework will need to be flexible to enable practical authorisation/regulation but also robust to address specific risks associated with these products containing live replicative viruses.

3.7 Members noted the prohibitive costs of producing bacteriophage products to GMP standards due to their variations and changes to the master seeds and that it would be easier to regulate claims than properties. Product development had stalled in some areas due to safety concerns. VMD agreed that it was a difficult balance between over and under regulation. Once the VMD classes a product as a medicine it falls under its responsibility and it is best placed to carry out risk assessments but cross agency approval would be required for some aspects.

3.8 The Chairman thanked Professor Clokie for an interesting presentation and said he would bring up the subject at the chairs of Defra scientific committees meeting he is attending next week.

4. Minutes of the meeting held on 26 May 2022

4.1 The Committee had cleared the minutes of the May meeting by correspondence and the Summary minutes were available on the VPC pages on Gov.uk (www.gov.uk/government/organisations/veterinary-products-committee/about/membership).

5. Matters arising from the minutes

5.1 Pharmacovigilance Reporting

5.1.1 Minute 5.3.4: Questions about pharmacovigilance reporting were addressed under item 7.

5.2 Role of the VPC

5.2.1 Minute 6: The role of the VPC was discussed under item 6.

6. Role of the VPC

6.1 **R&D strategy**

6.1.1 VMD's Head of Research and Development, Niloy Acharyya, presented the agency's R&D strategy and explained the different types of research the VMD can commission, from literature searches to supporting PhDs. Proposals are developed in areas which are beneficial to veterinary science and animal health, agreed by the R&D steering group and then put out to tender, usually through open competition but, by exception, single tender can be used. A number of different organisations are assigned to carry out the work, including universities, veterinary representative bodies and other government departments. VMD works closely with the Animal and Plant Health Agency (APHA) on researching AMR. The R&D strategy is currently

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being revised and VMD is keen to get VPC members' views on suitable topics and the extent they would like to be involved in reviewing reports and disseminating information. Members agreed that R&D is important for filling evidence gaps and would feedback comments to him directly or through the secretariat.

6.2 **VPC strategy**

6.2.1 Members discussed the paper provided by Dr Mackay on developing a strategy for the VPC which sets out its future role and activities. The committee noted that its role in providing independent advice to the VMD had not changed. The committee further noted the potential increase in its work in advising on issues previously dealt with through the EMA / CVMP as part of the UK membership of the EU. It was also proposed that the committee cooperate with other committees working in related areas and act as an important source of communications for the public. The aim would be to act to balance its role as a reactive body and move to proactively identify and consider important current issues. Members agreed that there was a need for a strategy and a vision which sets out its aims and that the next step would be for a small working group of members to meet in the coming months and, with input from VMD, draw up a concise strategy document for signing off at the next meeting in February. It was acknowledged that the strategy would need to align to the legal responsibility and terms of reference of the committee and be mindful of the resources and time commitments required.

7. Pharmacovigilance reports for March to July 2022

7.1 **Introduction**

7.1.1 The Committee considered and commented upon the Pharmacovigilance Report for March to July, which was presented by the head of the VMD's Pharmacovigilance Unit, Miguel Escribano.

7.1.2 Mr Escribano explained the new format of the reports, including a description of how the analysis is carried out. The format is still subject to change given that the process for producing them from the new software (PV-Analyser) is still under development. Some of the hidden columns in the report can be made visible easily and the PRR and lower confident limit values can be shown for future reports. The Proportionality Reporting Ratio (PRR) calculation will be replaced by the Reporting Odds Ratio (ROR) methodology, which provides practically identical results.

7.1.3 He explained that some of the information that has been requested to be included from VPC members can be added to the reports, but other information might only be provided on request due to the large number of events that VMD receives, and it would be too time-consuming to provide the information for each of those events. For example, the species affected by a particular event might be included in those cases where a signal is validated positively and the assessors work on that particular signal. The PhV team is always happy to provide additional information when required, even if this is outside of the VPC meetings schedules. Mr. Escribano also addressed the comment from Dr Killick about the expectedness of the adverse events: this is already taken into account when filtering the results on the reports, using information from the adverse events that are already included in the SPC of the products.

7.1.4 Mr Escribano also answered a comment from Dr Killick regarding the EU approach of moving away from PSUR and seriousness of the adverse events. He explained that as the VMD was heavily involved in drafting the new EU legislation, the procedures will be aligned as much as possible, bearing in mind that the VMD does

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not have access to the new EU pharmacovigilance database (EVVET), and therefore we will need to require some additional data from the MAHs at the point of benefit risk assessment.

7.1.5 There was an action pending from last meeting regarding the publications made by the pharmacovigilance team, and how to reach a wider audience, for example by making the publications available online, or translating them to languages other than English being mindful of the farming sector in particular. Mr Escribano described the new strategy that is being developed by the Pharmacovigilance Team regarding all PhV related comms. This will include not only future publications, but also the review of the information provided in the annual report, and how to make the monthly update of changes to products' SPC more widely available – currently only included in VET Records, and some vets and/or practices might not be subscribed to these publications.

7.2 **Suspected adverse event reports in humans**

7.2.1 No reports from suspected adverse events in humans were discussed.

7.3 **Suspected adverse event reports in animals**

7.3.1 No reports from suspected adverse events in animals were discussed.

7.4 **Environmental incidents**

7.4.1 No reports from suspected adverse events in the environment have been received during the period from the last VPC meeting.

8. Evaluation of VMD assessment reports: Selection

8.1 Members were asked to select four marketing authorisation applications where the VMD has led and completed the initial assessment in the 12 months leading up to the end of August 2022 for the annual exercise to evaluate VMD assessments. The committee selected three pharmaceutical products from the list provided and one biological product.

8.2 The assessment reports for the selected products would be sent to members by 20 October for them to evaluate against the specified criteria. Members were asked to submit their evaluations to the secretariat by 20 January 2023 so they could be presented to the committee for discussion at its meeting in February.

9. Special Imports

9.1 The reports on special import certificates granted since the last meeting were reviewed. It was thought that the large amounts of one product for horses which had been requested could be down to user error by the applicant and Dr Bowen would use his networks to remind vets to take care when submitting requests. Members agreed that the VMD could continue to forward imports that may be of interest to them or where it seeks a view.

10. Horizon scanning: issues for consideration

10.1 No issues were raised.

11. Legislation update

11.1 The committee was informed that the final documents for the public consultation on the VMR had been approved by ministers and it will be held at the end of November.

12. Items for information

12.1 The following items for information are publicly available:

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12.1.1 The Veterinary Medicines Directorate Product Information Database (http://www.vmd.defra.gov.uk/ProductInformationDatabase/).

12.1.2 Reflection paper on the environmental risk assessment for parasiticide veterinary medicinal products used in companion animals

12.1.3 Vet Record article: Moxidectin use in sheep

12.1.3.1. Members noted that a recent article in the Vet Record had suggested clearer product labelling was needed for endectocide products containing moxidectin to prevent them being misused by farmers. The VMD informed the meeting that a product literature standard has been published and that dual labelling across regulatory jurisdictions to facilitate product availability would also need to be considered. The VMD would, however, review the points raised and report back to the committee at the next meeting. The importance of good point of sale advice was noted and it was confirmed that continuous improvement in this area was mandatory for SQPs.

12.2 The following items for information are not publicly available:

12.2.1 Report to the VPC on new MA applications granted.

12.2.2 Report from the Scientific Secretariat and the Biological Committee.

13. Annual declaration of Members' interests

13.1 Members were asked to send their annual declarations of interests to the secretariat.

14. Any other business

14.1 The Chairman would be attending a Chairs of Defra Scientific Committees meeting next week and offered to raise any issues on behalf of members.

14.2 The Chair of the Commission on Human Medicines, Professor Sir Munir Pirmohamed, had expressed an interest in seeing the pharmacovigilance work done by the committee and it was agreed to invite him to a future meeting.

15. Date of next meeting

15.1 The next meeting of the VPC will be on 9 February 2023.

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