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October 28, 2014

Shri Sunil Soni
Director General
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LEAVES
OF
IMPORTANT
SURVIVAL
TREES
IN
INDIA —
MAHUA,
KHEJDI,
ALDER,
PALMYRA
AND
OAK

Subject: Modifications in Indian Standards for poultry feeds (IS 1374: 2007) to limit non-therapeutic use of antibiotics through feed

Dear Shri Sunil Soni,

As you are aware that Centre for Science and Environment in its latest study on antibiotic residues in chicken meat has pointed to large-scale unregulated use of antibiotics in intensive rearing of chickens for meat and its strong linkages with growing problem of antibiotic resistance in India. We found that antibiotics mixed with feed are indiscriminately used to promote growth of the chicken. Such use is also prevalent due preventive effect it may have on the entire flock. Both are non-therapeutic uses and are known to contribute hugely to the emergence and spread of resistant bacteria in chickens which later gets transferred to humans. For details on study findings, please see www.cseindia.org. The results have also been shared with your office in August, 2014.

Antibiotics are mixed in feed by feed manufacturers and on-site by poultry farmers. Antibiotics are also available as part of premixtures which are labeled to promote growth and prevent disease (please see **Annex 1 - list of premixtures with antibiotics**). As part of our suggestions to address the issue, we had earlier highlighted the need for revision in the existing standards i.e. **IS 1374: 2007 Poultry Feeds – Specification (fifth revision)**.

In continuation to our work in this regard, we have now conducted a detailed assessment on modifications required in the said Indian Standard (IS) keeping in view the findings of our study and how feed and feed additives are regulated in member countries of the European Union. We have presented below our inputs on key issues and gaps in the existing standard. We have also provided required specific modifications (please see in **Annex 2 – specific modifications required**).

Issues and gaps – IS 1374: 2007 Poultry Feeds – Specification (fifth revision)

- The standard is voluntary. It should be made mandatory, particularly with reference to use of antibiotics which as of now is non-binding
- Besides growth promotion, use of antibiotics in feed for mass disease prevention also needs to be addressed. Both should be defined
- Use of all antibiotics instead of antibiotics with systemic action needs to be prohibited
- Antibiotic presence in both chicken feed and premixtures of feed additives is to be addressed

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- Provision to be made to allow use of antibiotics in feed for therapeutic purpose and yet minimise its misuse to be used for non-therapeutic reasons
- Details on anticoccidials that could be used are to be provided
- Inconsistency around the use of antibiotics is to be clarified/corrected
- Guidelines on water quality to be used to prohibit antibiotic use in water for non-therapeutic purpose
- Provision for tests for presence of antibiotics in feed to be introduced

Further, a separate Indian Standard on medicated feed should be developed for therapeutic use of antibiotics through feed as a route of administration. This would allow for regulated antimicrobial treatment of all food-producing animals including poultry and limit the possible misuse of antibiotic laden feed for non-therapeutic purpose such as growth promotion and mass disease prevention. This could be developed on the lines of how European Commission has proposed to regulate medicated feed [Proposal for a regulation of the European parliament and of the council on the manufacture, placing on the market and use of medicated feed and repealing Council Directive 90/167/EEC], wherein the medicated feed is defined as "a mixture of one or more veterinary medicinal products or intermediate products with one or more feeds which is ready to be directly fed to animals without further processing".

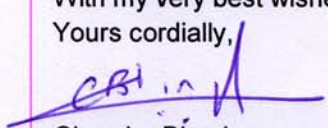
While developing such Indian Standard, BIS should consider the following key characteristics of the proposed EU regulation aimed to limit antibiotic resistance:

- Use of approved drugs to make medicated feed by an authorised establishment
- Supply of medicated feed only against a valid prescription by an authorized practitioner citing diagnosis, dosage, treatment plan etc.
- Medicated feed with antibiotics allowed to be used for a limited duration such as two weeks
- Medicated feed to be used only for one time treatment of the diagnosed disease
- Maintaining records of use and prescription by animal holder and veterinarian for inspection

We request your attention to the inputs provided above and urge to address these at the earliest in the meeting of the concerned sectional committee of Animal Husbandry, Feeds and Equipment. We also request you to consider our participating in the meeting. We believe modifying the existing standards to address misuse and overuse of antibiotics in poultry will be instrumental in combating emergence and spread of antibiotic resistance in India.

Please let us know if you need any clarifications. We would be happy to see you at your office.

With my very best wishes,
Yours cordially,


Chandra Bhushan

Encl: Annex 1: Examples of premixtures with antibiotics

Annex 2: Specific modifications - IS 1374: 2007 Poultry Feeds – Specification (fifth revision)

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Annex 1

Examples of premixtures with antibiotics to be used for growth promoters and disease prevention

Company	Brand	Antibiotic present	Information on label
Venky's	Bamylate	Bacitracin	For increased weight gain and improved feed efficiency
	Tylomix	Tylosin	A growth promoter. In broilers it provides uniform growth
Biomir Venture LLP	LINCO-MIR	Lincomycin Colistin Sulphate	Helps to increase the growth, body weight with economical FCR in broilers. Reduces the incidence of bacterial diseases. Broad spectrum activity and effective on both gram positive and gram negative bacteria
	CO-MIR	Doxycycline Colistin Sulphate	Helps to increase growth and body weight in broiler. Improves feed consumption efficiency. Act as best performance booster. Reduces non specific mortalities
Vetline	Progrovat	Doxycycline Colistin Sulphate	Protection and Growth under one shell. Better feed conversion hence increased weight gain in broilers. To control & prevent subclinical infections at all stages

Source: Respective company websites

Annex 2

Specific modifications: IS 1374: 2007 Poultry Feeds – Specification (fifth revision)

- Clause 4.1:
 - Add: antibiotics in the text 'The feed shall be free frominsect infestation'.
- Add Clause 4.1.5. It should state: *'The poultry feed shall not contain antibiotics for use as growth promoters or mass disease prevention. Prohibition of antibiotics in feed additive premixtures will further help attain this'*.
- Annex C, Clause C-3:
 - Delete: antibiotic growth promoters from example of non-nutritive feed additives.
- Annex C, Clause C-15:
 - Replace heading: 'RECOMMENDATIONS' with 'MANDATORY CONDITION'
 - Replace: 'The use of antibiotic growth promoters are NOT RECOMMENDED in poultry feed' with 'The use of antibiotics as growth promoters or for mass disease prevention is NOT ALLOWED in poultry feed'.
 - Add: Besides feed manufacturers, feed additive premixtures containing antibiotics are also used by poultry farmers at farms to make chicken feed that is used for growth promotion and mass disease prevention. Premixtures containing antibiotics with or without additional feed additives for such use are therefore NOT ALLOWED.
 - Delete: The last paragraph - 'It is recommended that antibiotic growth promoter with systemic action....next five years'
 - Add: Growth promotion refers to enhance rate of growth and feed efficiency. Typically, this means more chicken meat in less time and less feed. Very low-dose of antibiotics at sub-therapeutic levels are given through feed for most or entire life cycle.
 - Add: Mass disease prevention refers to antibiotic administration at sub-therapeutic doses to entire flock to prevent onset of a disease and in the absence of any sign of it.
- Clause 5.2.1 (b) under packing and marking:
 - Delete: name and quantity of the antibiotic
- Clause 7 of Tests: Test provisions that ensure absence of antibiotic residues in feed should be introduced
- The standards allow use of anticoccidials as feed additives. However, due to concerns of cross resistance, its use has been considered controversial and needs to be periodically monitored. Also, the list of allowed anticoccidials should be developed as certain anticoccidials are banned in member countries of the EU but are still used in India such as amprolium and dinitolmide (D.O.T.).

- Annex C, Clause C-11:
 - Add: 'Due to concerns of cross resistance, anticoccidials should be used judiciously. Disease prevention methods such as farm hygiene and sanitation should be given a priority'.
- Annex C, Clause C-11:
 - Delete: amprolium and dinitolmide (D.O.T.)
 - Revise list of commonly anticoccidials
- Annex D of the Standard should also prohibit routine addition of antibiotics for non-therapeutic use in poultry. Presence of antibiotics in water should only be allowed under veterinary oversight for therapeutic purpose. The standard should have provisions on guidelines and testing accordingly.
 - Annex D under water quality: Add text - 'Use of antibiotics in water is NOT ALLOWED for growth promotion and disease prevention purpose. Water to be fed to chickens must have antibiotics only as per prescription of a veterinarian to treat the diagnosed disease of the sick bird'
- Annex F: Provision for determination of antibiotics in feed to be used for growth promotion and mass disease prevention should be mentioned. The samples should be obtained from feed manufacturers and poultry farms.