

Position Paper

December 2024



Background

The principles on which FEAP considers the use of antibiotics and other drugs in fish farming are firmly focused on limiting the onset of antimicrobial resistance¹ and implementing sound management practices in fish disease management. Moreover, all possible biosecurity and prevention systems (e.g., vaccines) are needed to maximize disease control without resorting to therapy. It should be strictly used in a targeted and effective way whenever therapy is required. This is why appropriate and effective active ingredients/antibiotics are needed.

FEAP has welcomed the innovations introduced by the reform of the legislation framework on the matter through Regulation 2019/4 on the manufacture, placing on the market and use of medicated feed², Regulation 2019/6 on veterinary medicinal products³, and all the subsequent implementing acts such as the "Oral Medication Act" (Commission Delegated Regulation 2024/1159 supplementing Regulation 2019/6 by laying down rules on appropriate measures to ensure the effective and safe use of veterinary medicinal products authorised and prescribed for oral administration via routes other than medicated feed and administered by the animal keeper to food-producing animals⁴). The main innovations are the following:

- The theoretical opening of a single market for veterinary drugs for aquatic animals considered Minor Use and Minor Species (MUMS).
- The activation in this sense of a new formula of the "cascade principle" for aquatic animals (see art. 114 of Regulation 2019/6).
- c) The development of a list of drugs for terrestrial animals to be used in aquaculture, which should in fact increase the availability within the EU of drugs used responsibly and where necessary (see again art. 114 of Regulation 2019/6).
- The possibility of "on-farm mixing" in the cases specified by the legislation (art. 6 Regulation EU 2024/1159).

¹ FEAP Position paper on Antimicrobial resistance: https://feap.info/wp-content/uploads/2022/01/220118-feap-position-paper_amr.pdf

² Regulation (EU) 2019/4 of the European Parliament and of the Council of 11 December 2018

on the manufacture, placing on the market and use of medicated feed, amending Regulation (EC) No 183/2005 of the European Parliament and of the Council and repealing Council Directive

^{90/167/}EEC: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX;32019R0004

³ 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/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0006

Commission Delegated Regulation (EU) 2024/1159 of 7 February 2024 supplementing Regulation (EU) 2019/6 of the European Parliament and of the Council by laying down rules on appropriate measures to ensure the effective and safe use of veterinary medicinal products authorised and prescribed for oral administration via routes other than medicated feed and administered by the animal keeper to food-producing animals: https://eu-lex.europa.eu/legal-content/EN/TXT/PDF/?ui=01L_2024011596gid=1730630266776