



Australian Government
**Australian Pesticides and
Veterinary Medicines Authority**



Trade advice notice

on Amoxicillin in the product CCD Amoxicillin Trihydrate in Poultry

APVMA product number 36443

JULY 2019

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PREFACE

The Australian Pesticides and Veterinary Medicines Authority (APVMA) is an independent statutory authority with responsibility for assessing and approving agricultural and veterinary chemical products prior to their sale and use in Australia.

The APVMA has a policy of encouraging openness and transparency in its activities and of seeking stakeholder involvement in decision making. Part of that process is the publication of Trade Advice Notices for all proposed extensions of use for existing products where there may be trade implications.

The information and technical data required by the APVMA to assess the safety of new chemical products and the methods of assessment must be undertaken according to accepted scientific principles. Details are outlined in regulatory guidance published on the APVMA website.

About this document

This trade advice notice indicates that the Australian Pesticides and Veterinary Medicines Authority (APVMA) is considering an application to vary the use of an existing registered agricultural or veterinary chemical. It provides a summary of the APVMA's residue and trade assessment.

Comment is sought from industry groups and stakeholders on the information contained within this document.

Making a submission

The APVMA invites any person to submit a relevant written submission as to whether the application to vary the registration of **CCD Amoxicillin Trihydrate for Poultry** should be granted. Submissions should relate only to matters that the APVMA is required by legislation to take into account in deciding whether to grant the application. These grounds relate to the **trade implications** of the extended use of the product. Submissions should state the grounds on which they are based. Comments received outside these grounds cannot be considered by the APVMA.

Submissions must be received by the APVMA by close of business on **Friday 9 August 2019** and be directed to the contact listed below. All submissions to the APVMA will be acknowledged in writing via email or by post.

Relevant comments will be taken into account by the APVMA in deciding whether to grant the application and in determining appropriate conditions of registration and product labelling.

When making a submission please include:

- contact name
- company or group name (if relevant)
- postal address

- email address (if available)
- submission date.

All personal and *confidential commercial information (CCI)*¹ material contained in submissions will be treated confidentially.

Written submissions on the APVMA's proposal to grant the application for registration that relate to the **grounds for registration** should be addressed in writing to:

Residues and Trade
Risk Assessment Capability
Australian Pesticides and Veterinary Medicines Authority
PO Box 6182
Kingston ACT 2604

Phone: +61 2 6770 2300

Email: enquiries@apvma.gov.au.

Further information

Further information can be obtained via the contact details provided above.

Further information on public release summaries can be found on the [APVMA website](#).

¹ A full definition of 'confidential commercial information' is contained in the Agvet Code.

1 INTRODUCTION

The Australian Pesticides and Veterinary Medicines Authority (APVMA) has before it an application from CCD Animal Health Pty Ltd, to vary the registration of CCD Amoxicillin Trihydrate for Poultry containing 1000 g/kg amoxicillin trihydrate (equivalent to 870 g/kg amoxicillin free base).

Only two changes to the currently approved label are proposed, both relating to eggs.

1. the proposed egg withholding period is 'Zero (0) days' to allow use in actively laying birds. The currently approved egg withholding period is 'DO NOT use in laying hens (including chickens, turkeys and other poultry). DO NOT USE in replacement chicken layers (pullets or breeders) within eight days of laying onset, where eggs are to be used or processed for human consumption. Eggs laid during this period MUST NOT BE USED or processed for human consumption'
2. the proposed Trade advice statement relating to eggs is 'DO NOT ALLOW eggs treated with CCD Amoxicillin Trihydrate for Poultry within the last 14 days to be sold for export'.

The potential for residues in poultry tissues will not change as a result of the proposed variation as no change to the current withholding period is proposed and therefore poultry tissues will not be discussed further.

2 TRADE CONSIDERATIONS

Poultry eggs are currently considered to be a major export commodity.

2.1 Destination and value of exports

There are many potential markets for Australian eggs but currently the majority are exported to Hong Kong and Singapore.

Table 1: Major export of fresh shell eggs share by country of destination²

Destination	Value (\$,000)
Hong Kong	934
Singapore	465
Sri Lanka	215
New Zealand	199
New Caledonia	113
Vanuatu	93
Republic of Korea	78

2.2 Proposed Australian use-pattern

The proposed use involves oral administration of 8–20 mg amoxicillin/kg BW daily for three to five days to poultry in water. A ‘Zero (0) days’ withholding period is proposed for eggs.

Table 2: Proposed use pattern CCD Amoxicillin Trihydrate for Poultry (1000 g/kg amoxicillin trihydrate; equivalent to 870 mg/g amoxicillin)

Species	Claims	Dosage	Administration
Chickens, turkeys, and other poultry	Water soluble medication for the treatment of amoxicillin susceptible infections of the alimentary, urogenital and respiratory tracts of poultry, including organisms associated with the Chronic Respiratory Disease (CRD) complex and diseases caused by E. coli	110 g product/900-1000 L water for 3 to 5 days. 8-20 mg amoxicillin/kg BW daily depending on the severity of the condition. This is achieved by adding 110g CCD Amoxicillin Trihydrate to 900-1,000 litres of	Medicated water should be consumed within 12 hours and fresh solution prepared daily. Remove other sources of medicated water. Any variation by the prescribing veterinarian to the approved dose, frequency, duration, route, disease or target species may

² aecl.org/resources/export-reports

Species	Claims	Dosage	Administration
		drinking water for 3 to 5 days.	result in the need to extend the approved withholding period.

Withholding period:

Meat: Do not use less than two days before slaughter for human consumption

Eggs: Zero (0) days

Trade advice:

Export egg withholding interval: 14 days.

DO NOT ALLOW eggs treated with CCD Amoxicillin Trihydrate for poultry within the last 14 days to be sold for export.

2.3 Results from residues trials presented to the APVMA

Amoxicillin was administered to laying hens at the dose rate of 20 mg/kg (1x the maximum proposed dose) once daily for five days. Eggs were collected from day 0 to day 13 after the final dose. For each of the 15 replicate laying hens, amoxicillin residues peaked at either day 0 (n=9) or day one (n=6). The highest residue observed in eggs from the 15 laying hens was in ascending order 0.011, 0.012, 0.014 (2), 0.015, 0.016, 0.017 (2), 0.018 (3), 0.019, 0.021 and 0.024 (2) mg/kg. (STMR = 0.017 mg/kg). The upper one-sided 95 per cent confidence limit of the 95th percentile (95/95) residue calculated based on the highest residue observed (either day 0 or day one) in each of the 15 replicate eggs was 0.028 mg/kg. The OECD MRL calculator recommended an MRL of 0.05 mg/kg.

A peer reviewed study (Xie et al 2013), involved the administration to six hens of amoxicillin for five consecutive days at 25 mg/kg bw (1.25x the proposed dose rate) and mean residues in whole eggs peaked at 0.023 mg/kg at three days after the last administration.

The previously considered and re-submitted study on pullets found residues of 0.006, 0.008, 0.013, 0.016, 0.020 and 0.028 mg/kg in the first egg laid at 0–two days after the treatment (1x the maximum proposed use pattern). At three days after last treatment, residues in eggs ranged from <0.005 to 0.007 mg/kg. At four days after last treatment, and at all subsequent sampling times, residues in eggs were <LOD (<0.005 mg/kg).

Based on the available residues data, an MRL of 0.05 mg/kg (50 µg/kg) for poultry eggs (PE 0112) is considered appropriate for the use of amoxicillin in poultry in conjunction with a 'Zero (0) days' withholding period for eggs.

2.4 Overseas registration and approved label instructions

The applicant indicated that amoxicillin products are registered for use on laying chicken in New Zealand.

2.5 Codex alimentarius commission and overseas MRLs

The Codex Alimentarius Commission (Codex) is responsible for establishing Codex Maximum Residue Limits (CXLs) for pesticides. Codex CXLs are primarily intended to facilitate international trade, and accommodate differences in Good Veterinary Practice (GVP) employed by various countries. Some countries may accept Codex CXLs when importing foods. Amoxicillin has not been considered by Codex for use on poultry and other major markets such as Korea have not established relevant MRLs.

2.6 Current and proposed Australian MRLs for Amoxicillin

Table 3: Current MRL Standard—Table1

COMPOUND	FOOD	MRL (mg/kg)
AMOXYCILLIN		
ML 0812	Cattle milk	*0.01
MO 0105	Edible offal (Mammalian)	*0.01
PE 0112	Eggs	*0.01
MM 0095	Meat (mammalian)	*0.01
PO 0111	Poultry, edible offal of	*0.01
PM 0110	Poultry meat	*0.01
ML 0822	Sheep milk	*0.01

Table 4: Proposed MRL Standard—Table1

COMPOUND	FOOD	MRL (mg/kg)
AMOXYCILLIN		
DELETE:		
PE 0112	Eggs	*0.01
ADD:		
PE 0112	Eggs	0.05

2.7 Potential risk to trade

Export of treated produce containing finite (measurable) residues of amoxicillin may pose a risk to Australian trade in situations where (i) no residue tolerance (import tolerance) is established in the importing country or (ii) where residues in eggs are likely to exceed a residue tolerance (import tolerance) established in the importing country.

Finite residues of amoxicillin following the proposed use with a 'Zero (0) days' egg withholding period are expected in eggs, therefore the proposed use has the potential to unduly prejudice Australia's export trade of eggs. The proposed use includes a 14 day withdrawal period for eggs destined for exports. The available data found amoxicillin residues in eggs to be <LOQ (0.005 mg/kg) after four days post treatment and mostly <LOD (0.0009 mg/kg) seven days post treatment.

A 14-day withdrawal period for eggs destined for export is considered acceptable to prevent finite residues in eggs that may be exported.

3 CONCLUSION

CCD Animal Health Pty Ltd has applied for a variation of the registration of CCD Amoxicillin Trihydrate for Poultry containing 1000 g/kg amoxicillin trihydrate (equivalent to 870 g/kg amoxicillin free base), on laying poultry with a 'Zero (0) day' withholding period for eggs and a 14 day withdrawal period for eggs for export. Comment is sought on the potential risk to trade in eggs from the proposed use and the ability of the industry to manage any potential risk.