AFMA POSITION ON ANTIMICROBIAL RESISTANCE (AMR)

Introduction

The Animal Feed Manufacturers Association (AFMA) recognises antimicrobial resistance (AMR) as one of the most significant global challenges affecting human health, animal health, food production systems and the environment.

AFMA supports South Africa's broader national efforts to address antimicrobial resistance and, where relevant to the animal feed sector, supports internationally recognized, science-based principles relating to responsible antimicrobial stewardship, disease prevention, animal health and welfare, feed safety, surveillance and evidence-based decision-making, as promoted by WOAH, FAO, WHO, Codex Alimentarius and IFIF.

AFMA recognises AMR as a complex One Health challenge reflecting the interconnectedness of human, animal and environmental health. Addressing AMR therefore requires coordinated and proportionate action across relevant sectors, while recognising the distinct roles and responsibilities of stakeholders throughout the value chain. Sustainable progress requires collaboration among regulators, veterinarians, animal nutritionists, researchers and livestock producers, animal health companies and feed manufacturers.

AFMA believes that antimicrobial stewardship must be driven by science, measurable outcomes and South African realities.

The objective is not simply to reduce antimicrobial use. The objective is to reduce antimicrobial resistance, preserve the effectiveness of important medicines, improve animal health and welfare, and support sustainable food production systems.

Healthy animals require fewer antimicrobial interventions. Feed safety, sound nutrition, biosecurity, disease prevention, innovation and responsible stewardship are therefore fundamental components of any sustainable AMR strategy.

AFMA's Core Position

AFMA supports a science-based, risk-based and outcomes-focused approach to antimicrobial resistance.

AFMA believes

- AMR is a multifactorial challenge with no single solution.
- Responsible antimicrobial stewardship is essential for both human and animal health.
- Disease prevention is more sustainable than disease treatment.
- Healthy animals require fewer antimicrobial interventions.
- Animal welfare must never be compromised by inappropriate restrictions on necessary treatment.
- Food security, sustainability and antimicrobial stewardship must be pursued simultaneously.
- Policy should be informed by evidence, not ideology.
- Success should be measured by improved health outcomes and reduced resistance, not merely by reductions in antimicrobial use volumes

AFMA supports

- Responsible and prudent antimicrobial use under appropriate veterinary oversight.
- Preservation of the effectiveness of medically important antimicrobials.
- Feed safety and feed integrity throughout the supply chain.
- Disease prevention through nutrition, biosecurity, vaccination and good husbandry.
- Innovation that improves animal health, resilience and sustainability.
- Monitoring, surveillance and evidence-based decision making.
- Practical, science-based regulatory frameworks.
- Collaboration across the livestock value chain.

Understanding the South African AMR Challenge

AFMA believes that effective AMR policy must be guided by robust South African evidence. International experience provides valuable lessons, but South Africa should not assume that interventions which are effective elsewhere will necessarily address the primary drivers of AMR within local production systems.

AFMA therefore supports:

1.	Improved and accurate national anti-microbial use (AMU) reporting.
2.	Enhanced AMR surveillance programmes.
3.	Integration of animal, human and environmental monitoring initiatives.
4.	Development of credible national baselines.
5.	Ongoing evaluation of stewardship interventions and policy outcomes.

AFMA believes that global evidence should inform decision-making, but South African evidence should determine priorities. Policies should be evaluated according to measurable outcomes, including resistance patterns, animal health, welfare, food safety and sustainability.

The Feed Industry's Contribution to AMR Mitigation

The feed industry is a critical partner in reducing disease pressure and improving animal resilience. AFMA believes that its greatest contribution to AMR mitigation is not simply the removal of antimicrobial inputs. Rather, it is the creation of conditions that enable animals to remain healthy and productive while reducing the need for antimicrobial intervention.

The feed industry's contribution is built on five pillars.

Pillar	AFMA contribution and focus	Contribution to AMR mitigation
1. Feed Safety and Feed Hygiene	Feed safety management systems; good manufacturing practices; feed hygiene programmes; contamination prevention and control; mycotoxin management; supplier assurance; traceability; and continuous quality improvement.	Safe, hygienic feed supports animal health and reduces avoidable disease pressure. Feed safety failures can compromise animal health and indirectly increase the need for antimicrobial intervention.
2. Nutrition as Preventative Health Tool	Adequate nutrition that supports animal health and welfare, immune competence, productivity, resilience to stress and reduced susceptibility to disease.	When combined with effective management, housing and biosecurity, sound nutrition acts as an upstream disease-prevention strategy, helping to reduce reliance on antimicrobial intervention.

3. Gut Health and Resilience	Nutritional strategies that promote gastrointestinal functionality, intestinal integrity, microbiome balance, digestive efficiency, nutrient utilisation and gut resilience.	Stronger gut resilience helps animals withstand biological, nutritional and environmental stressors, reducing disease susceptibility and consequently the need for antimicrobial intervention.
4. Animal Resilience and Immune Function	Nutritional and management strategies that improve resilience to pathogenic challenges, environmental and heat stress, production-related stressors and other biological challenges.	More resilient animals are better able to cope with disease and stress, supporting animal welfare and productivity while reducing dependence on antimicrobial treatment.
5. Innovation and Continuous Improvement	Science-based innovation that advances animal health, welfare, sustainability, productivity, reduced disease pressure and responsible antimicrobial stewardship. AFMA supports practical and proportionate regulatory frameworks that maintain safety while enabling innovation.	Innovation provides new nutritional and management tools to prevent disease and improve resilience, creating sustainable alternatives and complementary approaches to antimicrobial intervention.

Prevention: The Most Sustainable AMR Strategy

AFMA believes that disease prevention represents the greatest opportunity for reducing antimicrobial reliance.

Preventative programmes should integrate:

- Biosecurity
- Vaccination
- Nutrition
- Feed safety
- Animal welfare
- Good husbandry
- Water quality management
- Environmental management
- Integrated herd and flock health planning

Reducing disease pressure reduces the circumstances under which antimicrobial intervention becomes necessary. A sustainable way to reduce antibiotic reliance is to reduce the disease pressure and other circumstances that create the need for their use in the first place.

Responsible Antimicrobial Stewardship

AFMA supports the responsible and prudent use of antimicrobials in accordance with applicable legislation and relevant science-based stewardship principles.

Stewardship means:

- Using antimicrobials only when genuinely necessary.
- Applying appropriate veterinary oversight.
- Using correct dosages and treatment durations.
- Adhering to withdrawal periods.
- Maintaining accountability and traceability.
- Continuously seeking opportunities to reduce unnecessary reliance on antimicrobials.

AFMA rejects two equally flawed approaches:

- Indiscriminate antimicrobial use.
- Indiscriminate antimicrobial removal.

Animals requiring treatment should continue to have access to appropriate antimicrobial therapy under veterinary supervision. Protecting animal welfare and preserving antimicrobial effectiveness are complementary objectives, not competing priorities.

Measuring Success

AFMA believes antimicrobial stewardship should be measured by outcomes rather than inputs alone. Reducing antimicrobial use can be an important stewardship indicator, but it should not be considered the sole measure of success.

The ultimate questions are:

1	Are animals healthier?
2	Is disease burden declining?
3	Is antimicrobial resistance being reduced?
4	Are antimicrobial therapies remaining effective?
5	Is food production becoming more sustainable?

The removal of a specific antimicrobial practice may reduce a specific selection pressure, but no single intervention should be regarded as a complete AMR solution. AMR requires continual measurement, evaluation and adaptation.

Monitoring, Surveillance and Evidence-Based Policy

AFMA supports the development and use of credible antimicrobial use (AMU) and antimicrobial resistance (AMR) data to strengthen monitoring and surveillance and to inform science-, evidence- and risk-based decision-making.

AFMA advocates for:

No.	Monitoring and policy measure
1	Reliable and standardised AMU data, including relevant feed-sector data.
2	Credible, standardized and appropriately governed reporting, with appropriate transparency and due regard for confidentiality and commercially sensitive information.
3	Robust AMR surveillance systems to identify resistance patterns and trends.
4	Science- and evidence-based policy development.
5	Risk-based and proportionate regulatory decision making.
6	Ongoing AMR research and innovation.
7	Collaboration among industry, government and academia.

South African evidence, risks and conditions should guide national priorities and regulatory interventions. International developments and evidence should inform, but not replace, South African AMU and AMR data, production conditions and risk assessment in determining appropriate national priorities and interventions. Antimicrobial use, disease pressures, production systems and AMR patterns may differ between countries and regions. Regulatory measures affecting the availability or use of antimicrobials should therefore be considered in terms of their necessity, proportionality and relevance to South African conditions.

Reliable AMU and AMR data are fundamental to effective antimicrobial stewardship, enabling South Africa to identify priorities, inform appropriate interventions and assess their effectiveness over time.

Regulation and Stakeholder Collaboration

AFMA supports transparent, science-based and practical regulatory frameworks.

No.	Regulatory measure
1	Be evidence-led and risk-based.
2	Be technically and economically practical.
3	Consider South African production realities.
4	Protect animal health and welfare.
5	Preserve food security.
6	Promote competitiveness and sustainability.
7	Encourage innovation.

AFMA believes successful AMR strategies are built through collaboration rather than confrontation. Industry, government, academia, veterinarians and producers must work from a common evidence base and towards common outcomes.

AFMA's Vision

AFMA believes antimicrobial resistance is best addressed through an integrated preventative approach built on:

No.	Integrated approach
1	Feed safety.
2	Sound nutrition.
3	Gut health and resilience.
4	Animal resilience.
5	Biosecurity.
6	Vaccination.
7	Animal welfare.
8	Responsible antimicrobial use.
9	Innovation.
10	Monitoring and surveillance.
11	Science-based collaboration.

The feed industry is a critical partner in creating healthier animals, safer food systems and more sustainable livestock production.

AFMA Key Message

Antimicrobial resistance cannot be solved through a single intervention. AFMA supports a science-based, risk-based and outcome-focused approach, consistent with One Health principles, that combines responsible antimicrobial stewardship, robust South African data, disease prevention, nutrition, biosecurity and innovation.

The goal is not simply fewer antibiotics. The goal is healthier animals, reduced disease burden and the preservation of effective antimicrobials for both animal and human health.

AFMA Position Summary

"AFMA measures success by the resistance we reduce, not simply by the antibiotics we remove."