Pre-Application Assistance – APVMA Written Assistance - Request Tier 2 as part of the '2021-22 Priority Setting Forum of the Assistance Grants – Access to Industry Priority Uses of Agvet Chemicals program' (Grant Program).

Applicant name: FISHERIES RESEARCH AND DEVELOPMENT CORPORATION
Assistance tier: 2
PAA number: 132616
PAA name: CCD OTC® (52863) / Marine and freshwater crustaceans / Susceptible bacterial infections / DAWE 2021

Summary of proposed application:

This PAA lodged by **Fisheries Research and Development Corporation** is to seek assistance to confirm data requirements for an off label permit regulatory submission of an oxytetracycline water soluble powder registered product CCD OTC (#52863) for the treatment and prevention of susceptible bacterial infections, including but not limited to Vibrio spp. and Aeromonas spp. in marine and freshwater crustaceans. Specifically, advice on data requirements on the areas of Efficacy and Target animal safety, Environment, Human health/worker safety and Residues and Trade is sought for the proposed application.

APVMA advice:

The APVMA has reviewed your pre-application assistance application and provides the following advice under each of the relevant risk areas.

Human health (Toxicology and Worker Health and Safety):

As the product is currently registered, no additional assessment of the toxicity of the formulation is required. The product referenced in the application form is registered for use in poultry by administration via medicated drinking water. This will result in potential exposure during the preparation of the drinking water, and during the supply of the water to the poultry. The proposed use is for treatment via immersion or in feed. To support these uses, information should be provided on the likely amount to be handled on a daily basis through preparation of treated solution and treated feed as well as through any handling related to immersion or through the feeding of medicated feed. Should feed be prepared in bulk, the quantity of product handled for the preparation of the batch should be indicated. The information can be provided as a simple statement of the quantities likely to be handled along with a description of how the process is carried out. A module 6.3 assessment is required.

Residues and Trade:

You have indicated your intent to apply for a permit use of oxytetracycline on freshwater and marine crustaceans and propose the submission of literature in support. Based on available literature, residues data should not be required to support an initial minor use permit for this use pattern. No additional residues trial data is considered necessary for submission of a permit application for the considered use of oxytetracycline on crustaceous.

A residues module 5.5 is likely to be sufficient for a permit assessment based on current APVMA module descriptors.

Environment:

There are no suitable reference products to address the environmental risks of the proposed use of CCD OTC (oxytetracycline hydrochloride water soluble powder) on freshwater and marine crustaceans. Therefore, an environmental assessment is required.

For veterinary medicinal products (VMPs), the APVMA has adopted VICH guidelines on data requirements for environmental safety[1]. Based on the submitted materials under this PAA, a Phase II assessment is anticipated and therefore module 7.2 is considered to be appropriate.

The information cited in the submitted finfish assessment is considered to be suitable for assessment. Please ensure all supporting/ cited information is submitted for assessment.

Efficacy and target animal safety:

The literature provided with this PAA includes pharmacological, dose determination and target animal safety information, which can all be submitted in support of the permit application. The US registration of oxytetracycline for delivery by immersion for aquaculture can also be considered as indicative of the efficacy and safety of OTC in crustaceans. However, all this information is based on overseas data; a confirmation that the observed efficacy and safety from overseas studies will be obtained under the Australian use situation is lacking. The following additional information will be required:

- Efficacy and safety information under the Australian use environments (temperature, water salinity, etc). As highlighted in the review you have submitted, the pharmacokinetics of OTC is affected by variation in environments. It is not clear whether the overseas studies detailed in the provided literature were conducted under conditions typical of crustacean cultivation in Australia.
- Information in Australian crustaceans of economic importance is required, or a valid scientific argument justifying why the efficacy and safety from those overseas species can be extrapolated to the Australian species. It is not clear whether the crustacean species in the provided literature are representative of Australian crustaceans of economic importance.
- And finally information on the efficacy of CCD OTC against Australian bacterial strains, including *Vibrio* spp. and *Aeromonas* spp., is required.

A valid scientific argument may be submitted to address these identified information gaps. If adequate information does not exist in literature, you should demonstrate the efficacy of CCD OTC in at least 2 appropriately designed Australian field efficacy studies. These studies will also serve to confirm the safety of CCD OTC in crustaceans under the Australian use situation.

Special data:

[1] Phase I: http://www.ema.europa.eu/docs/en_GB/document_library/Scientific_guideline/2009/10/WC500004394.pdf
Phase II: https://www.ema.europa.eu/en/documents/scientific-guideline/vich-gl38-environmental-impact-assessments-veterinary-medicinal-products-vmps-phase-ii_en.pdf

When applying for a permit, for use of a product containing an approved antibiotic active constituent in a new species, a special data module 10.2 may be required. Determination of the risk to antibiotic resistance and whether a module 10 would not be required cannot be made in this PAA as more information would be required before making a decision. An assessment on whether the off label use in this application could increase in the use of the antibiotics or increase the risk to public health will be undertaken when the permit application is received by the APVMA.

International assessments:

The APVMA will consider relevant international assessments, provided the data supporting the assessment are also provided. Guidance for the submission of international data can be found on the APVMA website (https://apvma.gov.au/node/14186).

Resulting application:

The likely item number for this application is item **21**. The likely modules, timeframes and fees applicable, based on the current fee structure, for the proposed application are:

CCD OTC			
Module level	**Module type**	**Timeframe***	**Fee**
1	Preliminary assessment	(1 month)	
5.5	Residues	4 months	
6.3	Work Health and Safety	4 months	
7.2	Environment	7 months	
8.3	Efficacy and target animal safety	3 months	
10.2	Special data	7 months	
11.1	Finalisation	3 months	
Total		**10 months**	**$350**

**The timeframe for the application commences when the application passes preliminary assessment and all fees are paid. The total timeframe is the timeframe of the longest assessment module plus the timeframe of the finalisation module. The APVMA has up to 1 month to undertake preliminary assessment once the application has been lodged.*

Please note that applications may still be subject to recategorisation under section 70B of the Agricultural and Veterinary Chemicals Code. If recategorisation is required, you will be given the reasons why the modules are to be changed and the opportunity to respond.

If additional information is requested under section 159 of the Agricultural and Veterinary Chemicals Code during the assessment of the application, an extended timeframe as outlined in Schedule 6 of the Agricultural and Veterinary Chemicals Code Regulations will apply.

The assistance provided by the APVMA is based on the information provided in your Pre-application Assistance request. If the information you have provided is not complete or correct, that could limit the effectiveness of the assistance provided by the APVMA.

The APVMA gives no undertaking that any application lodged after receiving Pre–application Assistance will be approved.

Outcome:

If you require clarification of any issues addressed in this PAA, please contact the case management team at the APVMA (casemanagementt@apvma.gov.au). If you are seeking advice on additional/new questions you will need to apply for further pre-application assistance under a new application (https://apvma.gov.au/node/108).

When submitting this record in support of an application please ensure that you include it in your information list.