



CANADIAN VETERINARY
MEDICAL ASSOCIATION
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DES MÉDECINS VÉTÉRINAIRES

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August 31, 2016

The Honourable Jane Philpott
Minister, Health Canada

Via e-mail: hon.jane.philpott@canada.ca

Dear Minister Philpott:

The Canadian Veterinary Medical Association (CVMA) is the national body representing and serving the interests of the veterinary profession in Canada. The health and welfare of animals is a priority for Canadian veterinarians, along with a secure, safe food supply and public health.

The CVMA has for many years actively promoted responsible use of antimicrobials by the veterinary profession to protect both animal and human health and welfare. In addition, it has been a strong advocate for regulatory amendments to the federal Food and Drug Regulations that would strengthen veterinary oversight of the use of anti-microbial medications, and address gaps such as Own Use Importation (OUI) and the use of Active Pharmaceutical Ingredients (API), including for food animals. In this regard the CVMA welcomes the publication in Canada Gazette Part I (July 2, 2016) of Regulations Amending the Food and Drug Regulations (Veterinary Drugs — Antimicrobial Resistance).

Though the proposed regulatory changes would support CVMA's current position that direct use of APIs in animals by animal owners/caregivers should not occur without the direction and supervision of a veterinarian, they do not go far enough, particularly with in the case of food animals. Despite having some assurance of quality through the incorporation into the Regulations of requirements for Establishment Licenses (EL) and Good Manufacturing Practices (GMP), these substances would continue to not be reviewed through the Health Canada approval process for drugs, would have no safety, efficacy or quality control testing, and would have no requirement for adverse reaction reporting. These areas of serious concern currently exist and would remain under the proposed new regulations, despite the strengthening of veterinary oversight. The CVMA looks forward to understanding how these issues of potential significance to domestic consumers and international trade might be addressed should the Regulations be put into effect, through perhaps the development and application of new policies.

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The CVMA is aware that the Regulations were not intended to address several key areas where veterinary oversight could strengthen the responsible use of anti-microbial medications, including for example their dispensing and distribution (e.g. through feed mills and livestock medicine outlets) and the use of anti-microbial medications on-farm. The CVMA encourages VDD to continue to work with stakeholders in the provinces/territories and industry to ensure that all components of the complex system that defines antimicrobial production and use have the controls and oversight needed to mitigate the risks associated with anti-microbial resistance.

In closing, the CVMA wishes to express its support for the general direction being taken by the proposed regulations with respect to strengthening veterinary oversight of the use of anti-microbials in animals. It looks forward to receiving more information on how regulations might be enhanced or policies developed to address what appear to be remaining gaps in the Regulation of API in Canada.

Sincerely,



Troy Bourque, President

SR:TB/nn

cc: The Honourable Laurence MacAulay
Minister of Agriculture and Agri-Food Canada