



**Canadian Association of Bovine Veterinarians /  
Association Canadienne des Vétérinaires Bovins**  
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April 23, 2009

Dr. Gerald Hauer  
Chief Provincial Veterinarian  
Alberta Agriculture and Rural Development  
6909 – 116<sup>th</sup> Street  
Edmonton, AB T6H 4P2

Dear Dr. Hauer:

**Re: Amendments to the Production Animal Medicine (PAM) Regulations**

Thank you for providing the CABV/ACVB with the opportunity to comment on Alberta's proposed changes to its Production Animal Medicine regulations. Of particular concern is the proposed amendment to "*allow outlets to sell modified live virus (MLV) vaccines for infectious bovine rhinotracheitis (IBR), bovine virus diarrhea (BVD), parainfluenza-3 (PI-3), and bovine respiratory syncytial virus (BRSV)*".

We appreciate that MLV vaccines have been available for years; that they pose no human health concerns; and that in most cases they are properly labeled. However, as veterinarians, we recognize that the inappropriate use of MLV vaccines can harm the animal. Inappropriate vaccination of dams with MLV BVD and IBR vaccines can pose a significant risk to the developing fetus, either by direct fetal damage by the vaccine components or insufficient protection of the developing fetus from field infections. Furthermore, we do not believe that proper labeling will prevent the inappropriate use of these vaccines.

Unquestionably, there are many cattlemen who have a close working relationship with their veterinarians and over the years have become very knowledgeable about vaccines. However, there is also a population of producers who do not fully understand how vaccines confer protection against a specific set of infectious agents. We believe that it would be irresponsible to market MLV vaccines through the OTC outlets based on the premise that producers only need to follow the instructions on the label; a comprehensive herd-health program cannot be written on the label of a vaccine bottle.

The veterinary community has been educating producers for decades on their need to develop preventative health strategies. The dispensing of vaccines by veterinarians to their clients

creates one of the essential interfaces required for the veterinarian to tailor the vaccine protocol to the health requirements of the producer's herd.

Our concerns regarding this amendment are based on the principle of what is best in the long-run for the producers and the animals. None of us want to investigate an 'abortion storm' because a producer ignored the warnings on a bottle. If we are serious about advancing the health of the Canadian cattle herd, particularly in Alberta, then the regulations should promote a greater interaction with veterinarians, professionals who have extensive training in the areas of preventative medicine.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'T. Perrett', with a long horizontal line extending to the right.

Dr. Tye Perrett  
President, CABV/ACVB

TP:pmm