



**Canadian Association of Bovine Veterinarians /
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Ms. Karen Ash
Bureau of Policy, Science and International Programs
Therapeutic Products Directorate
1600 Scott Street, Holland Cross Building
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Ottawa, Ontario K1A 0K9
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Dear Ms. Ash:

RE: Project No. 1554 – Reclassifying Veterinary Progesterone Products from Part II of Schedule F to Part I

The Canadian Association of Bovine Veterinarians (CABV) represents over 650 veterinarians who are dedicated to beef and dairy practice, hence we are interested in the TPD's initiative to reclassify veterinary progesterone products as prescription products. We have studied the Notice of Intent on this issue and are aware that this change would exclude growth promotant implants compounded with progesterone and the feed additive melengesterol acetate (MGA). That said, we fully endorse this reclassification of veterinary progesterone products to Schedule F, Part I and for the following reasons.

We feel that society is becoming increasingly concerned with the quality of their food and that hormones in particular are of real concern. In reality, many, if not all of the veterinary progesterone products are currently being used under some level of veterinary supervision. Therefore it is logical to mandate the relationships between the producer, the product and the veterinarian. This not only addresses concerns raised in our own domestic markets regarding hormones in beef and dairy products, but just as importantly it demonstrates to our international trading partners that Canada is committed to producing wholesome products.

Respectfully submitted,

Dr. Tye Perrett
President

TP:pmm