



**Canadian Association of Bovine Veterinarians /
Association Canadienne des Vétérinaires Bovins**
112G - 116 Research Drive
Saskatoon, SK S7N 3R3
Phone: (306)-956-3543
Fax: (306)-956-3542
Email: cabv.acvb@sasktel.net

June 5, 2008

Dr. Gordon Dittberner
CVMA Task Force
Canadian Veterinary Medical Association
339 rue Booth Street
Ottawa, Ontario K1R 7K1
Email: agrivet@magma.ca

Dear Dr. Dittberner:

The Canadian Association of Bovine Veterinarians (CABV) has reviewed the “Draft Final Report OUI – April 08” and we agree with the Task Force’s final two recommendations as printed on page 10 of the document:

- ***“It is recommended that a Restricted Import Permit Program (RIPP) be implemented together with the introduction of legislation to close the current OUI provisions by Health Canada in the fall of 2008.*”**
- ***It was recommended and it is acknowledged that the Canadian Animal Health Product Regulatory Advisory Committee was initiated in early 2008 and it has begun to examine and recommend, in cooperation with the Veterinary Drugs Directorate, ways to improve regulatory efficiency and cost effectiveness relative to animal medications, while ensuring Canadian standards for human, animal and environmental safety and product efficacy are met.”***

We would, however, like to reiterate our support for a number of key issues raised in the Report.

We strongly believe that it is in the best interests of the veterinary profession and the Canadian livestock industry that food safety takes precedence over the need to provide less expensive pharmaceuticals to the livestock industry. Furthermore, we agree that the Veterinary Drugs Directorate (VDD) must have the final authority on deciding which products will be eligible for importation. We also believe that the current OUI Policy must be reformed so that its regulatory framework more closely approximates PMRA’s OUI/GROU Program. Currently, there is a major disconnect between the ease in which injectable pharmaceuticals intended for use in food producing animals can be imported into Canada as compared to the much more onerous requirements for importing herbicides. The VDD must move towards an importation policy that is more closely aligned with the PMRA’s and this must be done in a timely manner.

It was also noted that the Task Force failed to reach a consensus on a number of key issues. We were pleased however to see that in each instance the CVMA's position was very closely aligned with our own. Of particular note was the CVMA's position that the RIPP should be expanded to include veterinarians. If we understand your position correctly, the CVMA believes that veterinarians should be allowed to import pharmaceutical products and then offer them for resale to their clients, a position that we agree with.

Thank you for providing us with the opportunity to comment on the Draft Final Report and we are pleased with the CVMA's representation on the Task Force.

Kind regards,

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

Dr. Tye Perrett
President, CABV-ACBV

TP:pmm