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Consultations – Veterinary Drugs Directorate Policy
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Dear Dr. Alexander:

**RE: Final Report of the Task Force on Own-Use Importation of Veterinary Drugs
(August 5, 2008)**

The Canadian Association of Bovine Veterinarians (CABV/ACVB) represents approximately 650 food animal oriented veterinary practitioners from across Canada. We welcome any regulatory changes that would provide increased quality, safety, and efficacy of veterinary pharmaceuticals.

The recommendations provided in the **Final Report** are not substantially different from those proposed in the **Draft Report** of April, 2008; the CABV commented on that report via the Canadian Veterinary Medical Association (CVMA). Our previous position has not changed; however, we would like to reiterate the following:

- In the long-term, it is in the best interests of the Canadian livestock industry that food safety takes precedence over the provision of less expensive pharmaceuticals.
- The VDD must have the final authority on deciding which products will be eligible for importation.
- Producers are unlikely to engage in the *pilot project* if they can still access pharmaceuticals under the OUP.
- The RIPP must include a provision to allow licensed Canadian veterinarians to import pharmaceuticals for resale. The interests of the Canadian public are best served whenever veterinarians are involved in the dispensing of veterinary pharmaceuticals to producers.

- Replacing the OUP with the RIPP is a positive step, but regulatory reform is absolutely critical if the long-term objective is to protect the Canadian food supply, while increasing the competitiveness of our livestock producers.

Respectfully submitted,

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/ACVB

TP:pmm