



**Canadian Association of Bovine Veterinarians /  
Association Canadienne des Vétérinaires Bovins**  
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Nicole Sillett  
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Dear Ms. Sillett,

Thank you for providing us the opportunity to comment on the Dairy Farmer's of Canada Best Management Practices concerning Veterinary Natural Health Products in the dairy industry. As an association that represents bovine veterinarians from across Canada, it is important to our members that they be kept informed of such issues and we especially appreciate the chance to provide input.

**1. Within your province, can anyone other than a licensed veterinarian write a prescription for a vNHP for food animals?**

In all jurisdictions in Canada, only veterinarians licensed in the specific jurisdiction can write prescriptions for products requiring a prescription ("Pr" on the label) and being used in food animals.

Some products are available over the counter (OTC) in some provinces and producers can legally purchase and use these products according to the label directions for use, including appropriate withdrawal times.

Unless a vNHP is a prescription only product, there is no requirement for a veterinarian to write a prescription and the producer needs to comply with label directions and takes responsibility for its use and any untoward consequences.

Of course there are many situations where extra label drug use (ELDU) is deemed necessary by the attending veterinarian and prescriptions in these situations are imperative coupled with a valid Veterinary-Client-Patient relationship (VCPR).

The veterinarian relies on VDD approved products with the assurance the product has undergone thorough, scientific, evidence-based evaluation. In making the choice for ELDU, they are even more reliant and diligent on having sufficient scientific evidence to support animal safety, efficacy, and especially food safety.

ELDU is a recognized tool in the "practice of veterinary medicine" for animals within a "valid" Veterinarian-Client-Patient Relationship, since it facilitates access by licensed veterinary practitioners to certain drugs for the treatment of animals. However, ELDU in food producing animals by persons other

than licensed veterinarians is not recommended except when such use is conducted under the supervision of a veterinarian.

Where products have not been adequately reviewed by VDD and lack scientific evidence to support food safety, DFC has indicated that, under CQM, they cannot be supported. For these same concerns, veterinarians cannot be asked to write prescriptions for these products.

With this in mind, DFC and the CQM program should not allow their use on the dairy until they are properly reviewed and approved and, if used, the producer and not the veterinarian should bear full responsibility for the decision to use and any consequences stemming from their use.

Health Canada requires that all veterinary natural health products imported for sale, sold or advertised in Canada must have a valid DIN. Our association is very supportive of this as it provides regulatory oversight for these products. Food derived from animals (e.g., meat, milk, eggs) may potentially contain residues of a vNHP administered to the animal. As well, since drugs are given to animals which could enter the human food chain, the drugs may also have implications for human health. Since natural products are not necessarily safe, they need to be regulated to protect the health of animals, and of humans who consume food derived from treated animals.

Veterinarians rely on approved drug labels with warnings and cautions included that allow us to prescribe products with appropriate withdrawal times. If the label of a vNHP does not have these statements, veterinarians will be putting themselves at risk by writing a prescription for these products if there are residue violations that occur.

- 2. If only licensed veterinarians are permitted to do the above, do they require special training?  
and**
- 3. If homeopathic practitioners for food animals exist, who regulates them?**

Veterinarians are regulated and licensed provincially. If a veterinarian wishes to provide homeopathic services or other non “traditional” services these services would still fall under the Veterinary Medicine Act of that province and would be regulated by the provincial veterinary associations. The requirement for training does vary by province and the regional associations will be able to provide more details about this. Some veterinary associations have established guidelines for training in non-traditional medicine and others are still working on these guidelines.

We hope this helps to answer your questions. CABV/ACVB is very supportive of the regulation of all products used in food producing animals, traditional or non-traditional, so that public health and safety are protected.

Thanks again for the opportunity to respond to your questions.

Sincerely,



Dr. Randy S. Graham  
President

RG:pmm