



January 12, 2018

Vicky Grahovac
Ontario Ministry of Agriculture, Food and Rural Affairs
Food Safety and Environment Policy Branch
1 Stone Rd W
Guelph, ON N1G 4T6

Sent via email: antimicrobialresistance@ontario.ca

Re: Proposed changes to Regulation 730 under the Ontario Livestock Medicines Act

Dear Ms. Grahovac,

Ontario Sheep Farmers (OSF) welcomes the opportunity to provide comments on the proposed changes to Regulation 730 under the Ontario Livestock Medicines Act (LMA). OSF represents nearly 3,000 sheep farmers in the province of Ontario. With a focus on profitability and sustainability, the organization works in the areas of advocacy, industry capacity, research and market development. Its goal is to provide consumers with premium lamb and sheep products.

OSF supports prudent and responsible use of antimicrobials in sheep and livestock farming. In general, OSF sees the proposed changes to Regulation 730 of the Ontario Livestock Medicines Act as also supporting and improving responsible use of antimicrobials. OSF believes the proposed changes will also encourage farmers to establish – and in the case where a relationship exists, enhance - veterinarian-client-patient relationships, which is a positive step forward for the livestock industry.

OSF is requesting that a Regulatory Impact Assessment on the proposed changes be completed that can provide much needed information about the costs and benefits of the proposed regulatory changes. We understand that an assessment was conducted and shared with respect to the federal changes to the Food and Drug Regulations related to veterinary drugs and antimicrobial resistance. However, this assessment did not include any information about the impact of the proposed regulatory changes under Ontario's LMA.



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Specifically, OSF would like to see the following addressed in the assessment, and for industry to have an opportunity to review and comment on the assessment before the province proceeds with regulatory changes:

- Analysis demonstrating how the proposed action to eliminate the ability of Livestock Medicine Outlets (LMOs) to sell medically important antimicrobials (MIAs) meaningfully contributes to the goal of reducing antimicrobial resistance and/or reliance on MIAs;
- Analysis of the costs and benefits, both direct and indirect, to farmers, veterinarians, pharmacists, LMOs, and the broader public if LMOs are no longer permitted to sell MIAs; and
- Analysis assessing the feasibility and potential risks of allowing LMOs to sell prescription MIAs in Ontario.

We recognize that antimicrobial use in human and animal medicine can contribute to resistance and affect the ability to treat humans or animals. However, any oversight mechanisms that are put in place by government should not unduly deter access to antimicrobials that are needed to maintain animal health and welfare. We do have concerns that the proposal may not be able to achieve this balance.

OSF supports the rationale to increase veterinary oversight of MIAs. However, we do not support the proposal to limit the dispensing of these MIAs to veterinarians and pharmacists alone. Ontario has over 500 LMOs currently that are registered and licensed to dispense livestock medicines, including MIAs. The LMOs are capable and qualified to fill prescriptions prescribed by veterinarians. It is not clear in the proposal how restricting LMOs from selling prescription drugs supports the goal of reducing the risk of antimicrobial resistance in human health.

We are also concerned that the proposed limits to dispensing MIAs could create undue delays in accessing MIAs, particularly farmers in remote regions or areas served by a single veterinarian. Although OMAFRA analysis indicates most farmers are within one hour of an existing veterinary clinic, there are many farm businesses that are not. Further, certain geographic regions – northern Ontario specifically – may be served by a single veterinary clinic that may not have the capacity to respond to and service animal health requests outside of normal business hours.

To address this concern, OSF proposes that LMOs be permitted to sell and dispense prescription MIAs. Although separate regulatory amendments would be required to do this, we believe that regulatory allowances should be pursued to permit dispensary of MIAs beyond veterinarians and pharmacists.

OSF supports existing LMA requirements for sellers of livestock medicines related to expiry dates, storage requirements, sales records, etc. Also, OSF supports broadening the LMA to include all



sectors that utilize livestock medicines, including aquaculture and beekeeping. For over-the-counter veterinary drugs including vaccines and other biologics, OSF supports the existing oversight requirements and sales restrictions. We do not see a need or feel it's necessary for additional restrictions or requirements at this time.

OSF would like to see more investment made into allowing the use of electronic prescriptions, where an existing veterinarian-client-patient relationship exists. This could help address the concern of delays in dispensing medicines that we have outlined above.

Finally, OSF recommends that OMAFRA commit to offer an updated livestock medicines training course to livestock farmers to help promote and foster improved stewardship practices and prudent antimicrobial use in Ontario.

OSF thanks OMAFRA for providing the opportunity to comment on the proposed changes to Regulation 730 under the Ontario Livestock Medicines Act. We would be pleased to further discuss our comments and concerns with you and your staff at OMAFRA at your earliest convenience.

Sincerely,

A handwritten signature in black ink that reads "Robert Scott". The signature is written in a cursive style and is positioned above the printed name and title.

Robert Scott
Chair

