

Food Safety



Veterinary Drugs Requirements Summary

The primary goal of the Food Safety module of proAction (previously known as the Canadian Quality Milk program) is to ensure that farmers are implementing best management practices to produce safe milk and meat. The program requirements related to veterinary drugs are designed to ensure that farmers use veterinary drugs responsibly and in a manner that will not compromise food safety for the milk or meat their cattle produce.

What does the Food Safety module require regarding veterinary drugs?

The module requires strict best management practices regarding medicines and chemicals used on dairy cattle. Regarding drug choice, the module can only address the acceptability of products through the regulatory authorities, as approved drugs have undergone scrutiny to ensure their safety for food producing animals and human health.

The Food Safety (FS) module’s requirements related to veterinary drug usage are:

Farmers must only use veterinary drugs approved in Canada for use in dairy cattle according to the label or written veterinary directions.

Workbook, Section B:

FS17: Do you use only livestock medicines (including medicated foot baths):

- Approved in Canada for use in dairy cattle?
- According to the label?
- According to written veterinary directions, which must be available for every treatment administered not according to the label? (Record 8)

1. Health Canada permits farmers to import, for personal use on their own cattle, only drugs on *List B: List of Certain Veterinary Drugs Which May Be Imported But Not Sold*. List B drugs

Canadian Drug Definitions:

Prescription drug: a drug is classified as a prescription drug if any of its medicinal ingredients are listed on the Prescription Drug List, which is accessible on Health Canada's website. The Prescription Drug List replaced Schedule F in the Food and Drugs Regulation in December 2013.

A prescription drug has the **Pr** symbol on its label and a Drug Identification Number (DIN). However, prescription or OTC designations differ from country to country. As a result, the lack of a Pr symbol on a label of a drug from another country does NOT mean that it is classified as OTC in Canada. You need to check to make sure that the medicinal ingredients are not on the Canadian Prescription Drug List.

Over-The Counter drug: a drug is classified as OTC if none of its medicinal ingredients are listed on the Prescription Drug List. An OTC drug does not have a special symbol on its label, but it does have a DIN.

must meet a series of criteria set by Health Canada to be eligible, including being classified as over-the-counter (OTC) veterinary drugs by Canadian definition.

It is illegal, under Health Canada regulations, for farmers to import veterinary drugs designated as Prescription into Canada by any means (e.g. mail, courier, in-person).

If a farmer routinely uses a product in a manner that requires written veterinary directions for use

each time, the veterinarian may be able to provide a treatment protocol (valid for up to one year) to allow for consistent use on multiple animals. An example could be the routine treatment of a cow with metritis using higher than label dosage of penicillin.

The Food Safety module recognizes that the herd veterinarian has the professional expertise, access to information databases, and knowledge of the particular farm situation that would permit him/her to determine the risks to food safety of using unapproved drugs or extra-label applications. This does not mean that the Food Safety module expects veterinarians to provide written directions. Veterinarians have professional and legal obligations that restrict the situations where they can provide written directions. They must first be faithful to these requirements.

2. Canadian Organic Production Systems Standards: the Food Safety module accepts the use of products listed in Section 5 of the Permitted Substances Lists (PSL) for Livestock Production (CAN/CGSB-32.311) according to the specifications indicated. Any product on the PSL used in a manner that is not described on the PSL needs written veterinary directions, as this is considered extra-label use.

See list at CFIA website under *Organic production systems: permitted substances list*. It is published by the Canadian General Standards Board.

3. Veterinary Health Products: the Food Safety module accepts the use of Veterinary Health Products (VHPs) which contain a Notification Number (NN) on their labels.

What is the risk related to 2 drugs administered at the same time?

The Food Safety module considers two or more drugs administered at the same time an extra-label treatment. Even if each drug is administered according to its label, if the two drugs have the same active ingredient, their use in combination increases the effective dose to the animal and the

withdrawal time for each individual drug may not be long enough. However, many drugs can be given in combination with very low risk of impacting the withdrawals. As a result, the Food Safety module has narrowed the requirements to the following:

- Farmers must obtain written veterinary directions for the on-label use of any two antimicrobial treatments administered at the same time by any route.

Examples of two antimicrobials given at the same time that would require written veterinary directions:

- Intramammary antimicrobial treatment plus an intramuscular antimicrobial treatment.
- Intrauterine antimicrobial treatment plus any other antimicrobial treatment (IM, IMM, IV, SQ).
- An intravenous antimicrobial treatment plus any other antimicrobial treatment (IM, IMM, SQ).
- Examples of two treatments given at the same time that would NOT require written veterinary directions:
 - Antimicrobial treatment plus a vaccine.
 - Antimicrobial treatment plus a reproductive hormone.
 - Antimicrobial treatment plus an anti-inflammatory.
 - Antimicrobial treatment plus a dewormer.

Please note: the Food Safety module is concerned with both milk and meat withdrawals associated with drugs used in combination.

Please further note: another potential risk is administering a second antimicrobial treatment before the completion of the withdrawal time of the first antimicrobial treatment. Please talk to your veterinarian to ensure that you are applying

sufficient withdrawal times for both milk and meat if you do this.

Can farmers use an unapproved drug or chemical?

Farmers can only use an unapproved drug or chemical if they obtain written veterinary directions for it.

What is the risk associated with unapproved veterinary drugs?

Unapproved drugs present a great potential food safety risk, as they have not been evaluated for food safety, quality or efficacy by Health Canada. The requirement for written veterinary directions ensures that a veterinarian has evaluated the risks associated with the product, as veterinarians either have the knowledge or have access to sources of information that permit them to evaluate the need for the use of unapproved drugs and the measures necessary to mitigate any safety risk for the milk and meat produced from treated cattle.

Do teat dips need to be approved?

Yes, teat sanitizing products are classified as drugs, and must have a DIN (Drug Identification Number). Some teat cleansing products are included within organic production and are considered to be low-risk to use, but please note that without a DIN, they are not sanitizers, and, therefore, do not meet the sanitizing teats requirement.

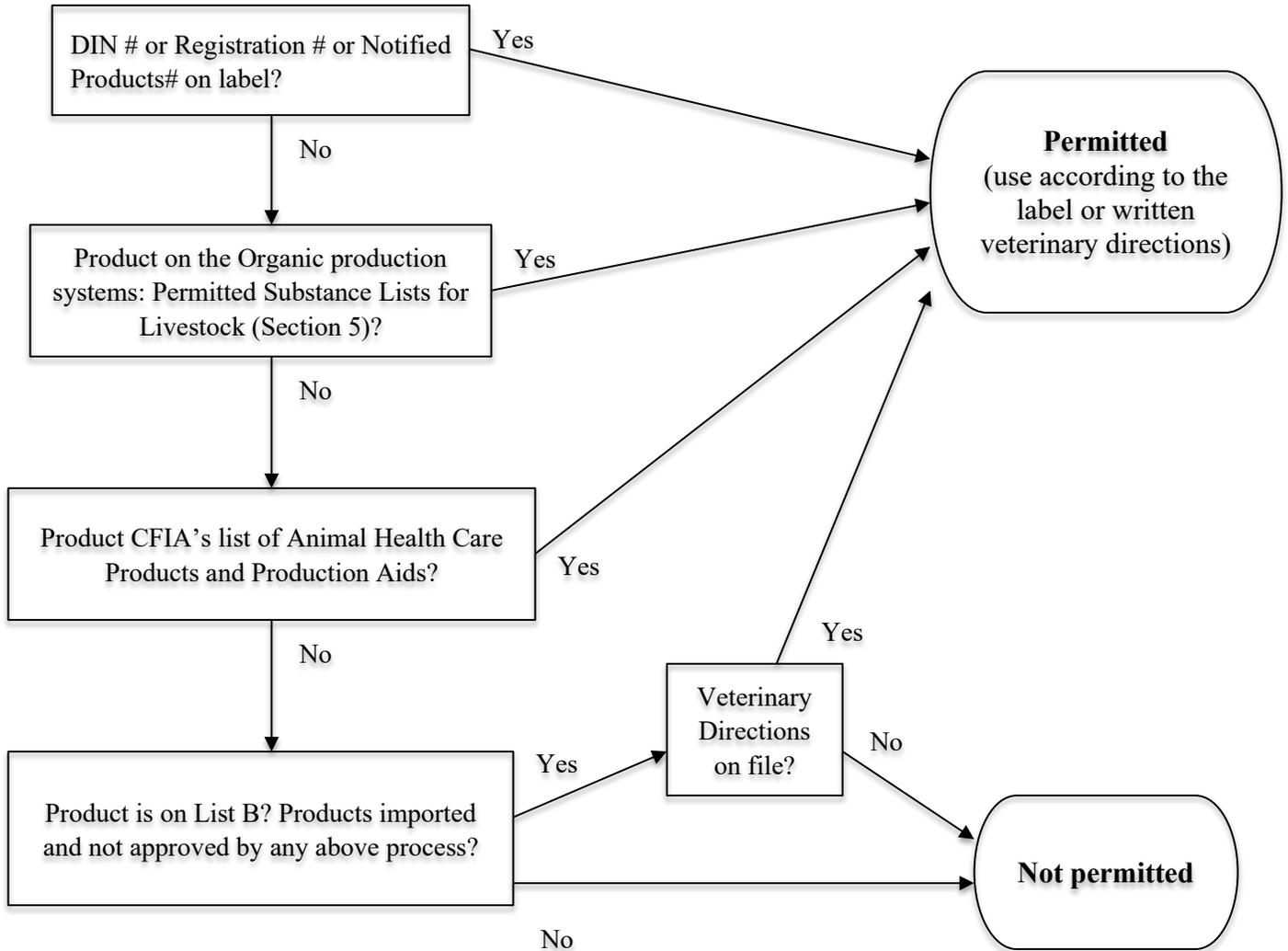
How will a validator score unapproved veterinary drug usage?

The use of unapproved veterinary drugs without written veterinary directions is a major nonconformance on a validation report under FS17. Farmers have to correct major nonconformances before their registration can be issued or continued.

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How can farmers or validators determine if a product is permitted?



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How can farmers or validators determine if a product is permitted

Who can I contact for more information?

1. Your provincial producer association
 2. Visit: www.dairyfarmers.ca/proAction
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