

Food Safety



Veterinary Health Products

Introduction

The Food Safety module (formerly known as the Canadian Quality Milk (CQM) program) is aware of the use of Veterinary Health Products (VHPs) for cattle; however, the module does not have the authority to address the acceptability of products, and must, therefore, rely on Health Canada as the regulatory authority for this information.

Health Canada is responsible for approving Veterinary Health Products (VHPs). These are low risk drugs in dosage form, used to maintain or promote the health and welfare of companion and food-producing animals. They are not used to treat, prevent or cure disease.

VHPs contain ingredients such as vitamins, minerals, and traditional medicines.

Food Safety Module Requirements:

The Food Safety module has two main requirements for the application of medications and chemicals used on animals, which includes VHPs:

1. Livestock medicines (including medicated foot-baths) must be approved in Canada for use in cattle. The module also accepts the use of organic products listed in **Section 5** of the Permitted Substances Lists for Livestock Production (CAN/CGSB-32.311) according to the specifications indicated, and the use of VHPs that are listed at Health Canada's *List C Veterinary Health Products*, according to specifications indicated and only for topical or oral administration.
2. Livestock medicines (including VHPs) must be used according to the label or according to written directions from a veterinarian.

The Issue?

The primary goal of the Food Safety module is to ensure that farmers are producing safe milk and meat. The module requirements are designed to ensure that farmers use products in a manner that will not compromise food safety for the milk or meat their cattle are producing.

If a VHP is not approved by Health Canada, they are not approved for use in cattle within the Food Safety module. These products must be administered **only topically or orally**. Products must have a Notified Number, be on Section 5 of the Permitted Substance List or be Production Aids to be acceptable. If they are not used according to label, farmers must obtain written veterinary directions to use them.

Note veterinarians cannot write directions for products without a known active ingredient, because they do not know the toxicity level, efficacy or whether or not they pose a food safety risk.

Please note: 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. This does not mean that the 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.

The main issue with VHPs is that without regulatory approval or written veterinary directions, the Food Safety module does not know whether these products are safe for use in food producing animals through different routes of administration (e.g. intra-mammary, intra-muscular, etc.).

Some products are used as feed or feed additives and not for medicinal purposes. To help determine when a feed or feed additive is not a medicine, please see the definitions for a drug, biologic, and feed/feed additive on the next pages.

The National Organic Standards:

The organic industry has developed the National Organic Standards, which require that all inputs used in organic production (e.g. fertilizers, feeds, veterinary treatments, etc.) shall be approved by the appropriate government regulatory agency for the products' intended use, where regulations govern the use of such inputs (section 1.7). The National Organic Standards also prohibit the use of substances that are not included in the Permitted Substances Lists.

See this list at CFIA's website under *Organic production systems: permitted substances list*.

What is a Veterinary Health Product?

VHPs are sourced from naturally occurring substances, usually plant based, and include homeopathic remedies. Health Canada considers them low risk drugs in dosage form, used to maintain or promote the health and welfare of

companion and food-producing animals. VHPs are not for treating, preventing or curing a disease.

VHPs contain ingredients such as vitamins, minerals, and traditional medicines.

Approval Process Definitions:

The current drug approval process recognizes or separates animal health products into four categories: drugs, biologics, feeds/feed additives, and VHPs.

- 1) **Drug:** the definition for a drug in the Food and Drugs Act is:

"drug" includes any substance or mixture of substances manufactured, sold or represented for use in

(a) the diagnosis, treatment, mitigation or prevention of a disease, disorder or abnormal physical state, or its symptoms, in human beings or animals,

(b) restoring, correcting or modifying organic functions in human beings or animals, or

(c) disinfection in premises in which food is manufactured, prepared or kept.

Note: The proAction Reference Manual refers to medicines, which is another word for drug.

- 2) **Biologic:** the definition of a veterinary biologic in the Health of Animals Act is:

"veterinary biologic" means

(a) a helminth, protozoa or micro-organism,

(b) a substance or mixture of substances derived from animals, helminths, protozoa or micro-organisms, or

(c) a substance of synthetic origin

that is manufactured, sold or represented for use in restoring, correcting or modifying organic functions in animals or for use in the diagnosis, treatment, mitigation or prevention of a disease,

disorder or abnormal physical state, or the symptoms thereof, in animals.

The proAction Reference Manual states that biologics are medicines obtained from animal or plant tissue. The biologics most commonly used on dairy farms are vaccines and immunoglobulin (antibody) preparations. The Canadian Food Inspection Agency’s website also states that veterinary biologics include vaccines, bacterins, bacterin-toxoids, immunoglobulin products, diagnostics kits, and any veterinary biologic derived through biotechnology.

3) Feed or feed additive: the definition for a feed in the Feeds Act is:

"feed" means any substance or mixture of substances containing amino acids, anti-oxidants, carbohydrates, condiments, enzymes, fats, minerals, non-protein nitrogen products, proteins or vitamins, or pelletizing, colouring, foaming or flavouring agents and any other substance manufactured, sold or represented for use

(a) for consumption by livestock,

(b) for providing the nutritional requirements of livestock, or

(c) for the purpose of preventing or correcting nutritional disorders of livestock,

or any substance for use in any such substance or mixture of substances.

4) VHPs: are drugs in dosage form used to maintain or promote the health and welfare of animals (e.g. products that contain vitamins and minerals, botanicals, traditional medicines and homeopathics), but are not used to treat, prevent or cure disease

VHP, not as a feed or feed additive, the Food Safety module requires the following:

Dairy farmers: consult with your veterinarian on any products that you are using as drugs (i.e. for medicinal purposes) that are not approved for use in dairy or that you are using extra-label. Obtain written veterinary directions for these products to ensure that you are following appropriate withdrawal times.

This includes products listed in **Section 5** of the Permitted Substances Lists for Livestock Production or VHPs that are listed with a Notification Number (NN) from Health Canada. Any product used in a manner that is not described on the lists needs written veterinary directions.

If your veterinarian cannot provide you with written directions, talk to your veterinarian about an approved, on-label alternate treatment.

Validators: all products being used as drugs should be used according to the label, or the organic Permitted Substances Lists, or written veterinary directions. Look for a DIN number or NN number to indicate Health Canada approval. Read the label to identify if the product is approved for use in cattle. Finally, check how the farmer is using the product and ensure that it coincides either with the label, the Permitted Substances Lists, the list of VHPs or valid written veterinary directions.

Veterinarians: because of the lack of standards and lack of depletion information for any product not on the VHP list, the Canadian gFARAD cannot give specific withdrawal information regarding the use of such products. Because they are not approved products, requests cannot be submitted through the CgFARAD website but veterinarians can contact CgFARAD at 306-966-2543.

Conclusion:

As long as a product is being used as a drug or a biologic (according to the definitions above) or

Who can I contact for more information?

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