

Food Safety



Veterinarians and the Food Safety Module

The primary goal of the Food Safety module (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 module requirements related to veterinary drugs are designed to ensure that farmers use veterinary drugs responsibly and in a manner that will not compromise the safety of the milk or meat their cattle produce. The module views veterinarians as an essential part of the process.

Farmers: which products can I use?

The module requires strict best management practices regarding medicines, Veterinary Health Products (VHPs) and chemicals used on dairy cattle. Regarding drug choice, the module can only address the acceptability of products that have been approved by Canadian regulatory authorities, as these approved drugs have undergone scrutiny to ensure their safety for food producing animals and for people who consume the food produced by those animals.

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

- a) Livestock medicines (including medicated foot-baths) must be approved in Canada for use in cattle with a DIN or NN. The module also accepts the use of products listed in **Section 5** of the Permitted Substances Lists for Livestock Production (CAN/CGSB-32.311) according to the specifications indicated, or products listed on the list of Animal Health Care Products and Production Aids, according to specifications indicated.
- b) Livestock medicines (including VHPs) must be used according to the label or according to written directions from a veterinarian.

Veterinarians: what does the Food Safety module require of veterinarians?

Farmers will require your help in meeting two requirements:

1. Obtaining **written veterinary directions** for:
 - a. Extra-label drug use of Canadian-approved products
 - b. Unapproved products that they would like to administer to their cattle.

In both of the cases above, you would only be expected to provide written directions if it is a treatment that you recommend or are professionally “comfortable” with. You are a valuable resource, given your training and expertise, and should be able to help farmers understand food safety risks through a valid veterinarian-client-patient relationship.

Veterinarians are not required to provide written veterinary directions solely at the request of the farmer, nor does the module evaluate written veterinary directions or services. Veterinarians have professional

and legal obligations that restrict the situations where they can provide prescriptions. You must first be faithful to these requirements, and you are held accountable via your professional association.

2. Obtaining a **Cattle Health Declaration** annually from their veterinarian. This is a record requirement that farmers will ask their herd health veterinarian for help with.

The requirement is: FS14: Do you have a Cattle Health Declaration signed by your veterinarian annually and the most recent version kept on file?

Rationale: The National Dairy Code, Section 31, states that no farmer shall sell or offer for sale milk that is obtained from an animal that shows evidence or visible signs of disease transmissible to humans by milk or that adversely affects the quality or flavour of the milk.

The intent of the Cattle Health Declaration is to satisfy the export requirement from foreign countries to demonstrate that milk used in exported products is sourced from healthy animals. An annual herd health inspection conducted by a veterinarian is the minimum requirement.

A veterinarian should look for evidence or visible signs in the herd for a disease that is transmissible to humans by milk or that adversely affects the quality or flavor of the milk. If the milk is considered acceptable by the provincial regulatory body, the veterinarian should be able to sign the Declaration.

All Canadian farmers are required to obtain the Declaration because milk is co-mingled in Canada, and milk destined for export products is not segregated.

A number of provinces have introduced their own version of the Cattle Health Declaration. These documents have been deemed equivalent and meet the proAction requirement.

The Cattle Health Declaration is in the Workbook.

Why does the Food Safety module require written veterinary directions?

Unapproved drugs and extra-label treatments can present potential food safety risks, as they have not been evaluated for food safety, quality or efficacy by Health Canada. The requirement for written veterinary directions ensures that a competent professional has evaluated the risks associated with the product or treatment. This is because 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 or extra-label treatments, and the measures necessary to mitigate any safety risks for the milk and meat produced from treated cattle.

Why veterinarians? Why not farmers?

Veterinarians are highly trained in veterinary drug usage and consequences. Furthermore, they can access services such as Canadian-Global Food Animal Residue Avoidance Database (Cg-FARAD), which provides technical information and advice on withdrawal issues related to extra-label drug use and exposure to toxic chemicals in food animals. Farmers cannot access this service, nor are they, as a prerequisite for their jobs, trained in pharmacology.

The Cattle Health Declaration does not include animal welfare. It is specific to animal health.

Why does the Food Safety module put drug residue responsibility on veterinarians?

Ultimately, farmers have the responsibility to use veterinary drugs responsibly and safely on their farms. It is farmers' responsibility and legal obligation to ensure that they are shipping safe milk and meat. As a result, farmers must seek written veterinary directions for any extra-label drug usage. If a veterinarian refuses to write directions (e.g. residue or efficacy concerns), the farmer must find an alternative to be compliant with the module.

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

The Food Safety module considers two or more antimicrobials 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 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 de-wormer.

Please note: the Food Safety module is concerned with both milk and meat withdrawals associated with antimicrobials 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.

Who can I contact for more information?

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