Goat Veterinary Consultancies - goatvetoz

22 Lesina St.,

Keperra,

Brisbane QLD 4054

3rd November 2015

Dr Joseph Morrall,

agvetreform@agriculture.gov.au

(phone 02 6272 4442)

Submission from the viewpoint of a veterinarian who provides services to the goat industry

I have read the discussion papers on the Department of Agriculture website i.e. http://www.agriculture.gov.au/ag-farm-food/ag-vet-chemicals/better-regulation-of-ag-vet-chemicals#discussion-papers

I have discussed the points raised from each paper below, keeping the needs of the goat industry in mind.

Re use of overseas data

– I support the proposal that if two trusted overseas countries' regulators have registered a product, then it can automatically be registered in intensive animal situations. However these examples should be expanded to include dairy goats kept in feedlot situations and companion backyard goats i.e. registered miniature or pygmy goats, registered stud dairy goats. Registered stud dairy goats are already exempt from having NLIS so this precedence of exempting dairy goats already exists.

Scope of regulation

– I generally support this proposal but there is a need to ensure information on hard surface and farm disinfection is available for disease control purposes. This does not have to be provided by the APVMA but by some trusted authority using standardized testing e.g. what disinfectants work for Johne's disease or emergency animal disease control , what works for teat dipping to prevent mastitis, what works for egg cleaning to prevent salmonella, what works for milking machine sanitation. The Department needs to arrange this alternative; which could mean contracting a University to do this as is done in the USA for teat dips. Australia does not have a system of Land Grant Universities as exists in the USA (where efficacy is not considered in the registration process), but it does have a number of veterinary schools but they would need funding to do this work. Protocols need to be established for standardized testing for efficacy as is discussed here: http://www.nmconline.org/articles/teatdip.htm. The Land Grant Universities in the USA provide information on farm disinfectants (http://www.uvm.edu/~ascibios/General/fmd.pdf) and the USDA provides information on disinfectants to be used in the case of a Foot & Mouth Outbreak (http://www.uvm.edu/~ascibios/General/fmd.pdf). While there are some Ausvetplans for some, but not all, exotic/emergency diseases, not all existing plans are up-to-date and lack information about current disinfectants.

Removal of efficacy

– Veterinary medicines, vaccines & farm disinfectants/antiseptics

are essential tools for vets and farmers and as such they should actually work. Individual vets do not have the capacity to gather data to ensure all the vet drugs or farm chemicals they recommend, actually work on all species nor do vets have the $ to bring a manufacturer to court for inaccurate claims. We could see a whole range of "natural" products registered and used to the detriment of animals and welfare issues. Australia's agriculture is more geographically diverse and hence likelihood of picking up vet medicine and vaccine failures is more difficult.

Relying on consumer law has been shown not to work for veterinary areas. Consumer regulators have limited resources and give priorities to children toys and human safety cases. Also they do not have the expertise to evaluate cases in vet medicines and agriculture. Here are two examples of where this has happened. The first case was written up (with graphic photos) a few years ago in the "Queensland Country Life" and involved horses that had bad chemical burns due to obstetrical lubricant (which was not a vet medicine but a mechanical aid hence not in the agvet chemical regulatory remit). According to these articles, Qld Consumers Affairs did NOT want to know and neither did the ACCC, although it was referred to them in writing. The owner of the mares was not successful getting any regulator to help. The second case is where the consumer affairs regulators (Trading Standards) in the UK are also the regulators in the UK for smuggled in puppies from the EU and Eastern European puppies and AW organisations over there report they cannot get them to take action and now organized crime is involved. See https://www.thewebinarvet.com/webinar/bursting-at-the-seams-companion-animal-population-management/ which is a video of the AWF seminar from June 2015 (and this is discussed near the end of the video).

Some vaccine have important human health consequences e.g. Hendra virus and leptospirosis. It is critical that these vaccine are assessed for efficacy. The proposed new Q Fever vaccine is another example of a vaccine that needs efficacy consideration to protect human health.

The detection of residues are a major risk to Australia's agricultural exports and economy as has been shown by past history. There is therefore a risk of residues of products are not working effectively then users may increase the doses rates and risk the residues.

Re Crop groupings- no comment

Re Contestable provision of assessment services – there is a real danger when combined with the proposed relocation of the APVMA to a regional town that many experienced staff may leave to become consultants to do the pre-application assessments. In principle sounds OK but should be very carefully implemented with only a small % a year allowed to slowly introduced and any problems identified early.

CEO as poison schedule delegate – supported but there should be some review process involved as well.

Re import permits – Supported It will be helpful to be able to import unregistered goat medicines without a permit for my clients to use under my direction. However it is necessary to ensure that this change is associated with better regulation of overseas

manufacturing facilities and sampling of overseas manufactured veterinary medicines. This is necessary as shown by the FDA (the USA Regulator) as demonstrated by this news report: http://www.business-standard.com/article/international/fda-chinese-pfizer-plant-hid-failures-used-old-ingredients-115110200014_1.html

Re not publishing a summary of new registrations/permits

I do read the agvet gazette every fortnight and skim the new veterinary medicines registrations to look for any new useful vet drugs or active chemicals for goats. I find this useful. While PUBCRIS databases has them, you don't know what is new and hence don't know what to add in to search if registered. For major new vet drugs for major species, there will be promotional material, but not for minor species. If you don't know what is newly registered, you don't know what to look up on the APVMA website. Vets would need to conduct searches for registered chemical treatments every disease to ensure they had not missed a new treatment. I suggest that a survey be conducted to get feedback on the APVMA Gazette and keep it going if current subscribers wish it to continue.

I am happy to discuss these points raised by phone or email. Unfortunately I was interstate when the Brisbane workshop was held.

Dr Sandra Baxendell, PSM, BVSc (Hons), PhD MANZCVSc, GCertAppSC(RurExt), GCertPSectMgt, PGDAppSc, MRurSysMan
Director, Goat Veterinary Consultancies -goatvetoz
goatvetoz@gmail.com
Mobile 0477 813278 Skype goatvetoz
http://www.goatvetoz.com.au