

I welcome the draft productivity commission report (<http://www.pc.gov.au/inquiries/current/agriculture/draft>) into red tape in agriculture and support the majority of this report. I would like to highlight some additional problems, with my solutions, which are discussed below:

### ***Animal Welfare***

- Lack for RD&E funds for Animal Welfare is an issue for minor species e.g. the dairy goat industry has recognized that it needs a solution for excess male kids. Rearing male dairy breed kids for meat is not economic and staff at abattoirs do not want to kill young kids. An economic method of humane destruction of newborn male kids or for AI with sexed semen to prevent their birth, is needed yet the industry lacks the funds to do this R&D. The RIRDC funding available for research for dairy goats has been allocated for Q fever research, which as a zoonotic disease, has priority.
- Access to vet medicines for pain relief for goats & for treating kids being dehorned or castrated is an on-going issue. Breeding poll goats is not an option as the poll gene is linked to an intersex gene and the dairy goat industry has recognised it needs a painless method of stopping horn growth. Meloxicam injection has recently been registered for use in cattle, sheep, pigs and horses, but not goats. Meloxicam buccalgesic products are registered for cattle and will soon be registered for sheep, but will not be registered for goats, due to lack of a large enough market. These products can be prescribed by a veterinarian but as vets lack a Farm Animal Residue Avoidance Database (FARAD, [www.farad.org](http://www.farad.org)) service that vets have in the USA, many vets therefore lack the information about the with-holding period (WHP) that must be given by law with the prescription and are reluctant to help goat owners due to liability issues. Goat organisations lack both the skills, information and funds to apply for a minor use permit to use these pain relief veterinary medicines, which was another option to overcome this issue of a WHP.
- The only minor use permits for goats (as per a search using “goats” performed on 26/7/16) were for a footrot vaccine for sheep & goats and the one held for Foot & Mouth vaccines for all cloven hoofed animals. This highlights that minor use permits are not easy to prepare and submit. Goat owner organisations lack the funds and expertise to submit a minor use permit applications, especially as these must now be submitted via the online portal. The APVMA do not list goats as a major trade species (<http://apvma.gov.au/node/10931>) and hence minor use permits are theoretically possible. However an organisation or an individual must apply for this permit and hold it and many are very reluctant to take on this responsibility fearing liability if any residue is found in an overseas market. Growcom holds many horticulture minor use minor crop and fruit chemical permits as the Horticulture Australia Board does not want to hold these permits. Minor use permits are therefore not a

solution to lack of access to veterinary medicines and routine husbandry treatments for goats.

- Victorian Control of Use legislation allows the use of sheep medicine “Over the Counter” products such as worm drenches and lice treatments, in goats but most other states do not. This means that goats suffer from disease unnecessarily due to the lack of treatment options in the majority of Australian states. Currently there are only 2 registered products to treat goats for lice (Pestene powder and Clout S, which is difficult to purchase). Neither of these products can be used in milking goats, even with a veterinary prescription, as the labels have “do not use” statements that vets cannot override under current legislation e.g. the Pestene label states “Goats - Milk: Do not use on lactating does where milk or milk products may be used for human consumption.” Victorian milking goats can legally be treated by their owners with sheep lice treatments as long as no residues are produced, although no service is available to owners to determine how to do this. Goat owners in other states must find a veterinarian will to prescribe a dog or sheep product with a written with-holding period without the support from a service such as FARAD (see above) to determine this legally required milk with-holding period.

### ***Food Safety & Other Audits***

- Goat producers also have duplication of audits by government authorities and commercial entities such as supermarkets as well as Livestock Assurance Program audits of they sell goats for meat. It is not only the cost but the time and record keeping requirements. Auditors should agree on one set of records that meets their requirements, so that goat farms need to keep only one set of records that all auditors would then use. Privacy agreements need to be agreed to share audit findings and hence limit audit numbers.

### ***Vet medicines***

- The draft paper calls for speedier and more consistent access to agricultural chemicals and veterinary medicines and this is strongly supported.
- This report noted that “a study by the Australian Bureau of Agricultural and Resource Economics and Sciences, which found that access to agvet chemicals for minor use was restricted by factors such as the high cost of applying for a minor use permit. (A minor use permit allows the use of a chemical where the economic return to an applicant would not cover the cost of full registration.)” However as the APVMA has now moved to an on-line portal for all permit and registration applications and as goat organisations which have only unpaid voluntary office bearers, they have no staff who have been trained in the use of this portal. The only minor use permits for goats (as per a search using “goats” performed on 26/7/16) were for a footrot vaccine for sheep & goats and the one held for Foot & Mouth vaccines for all cloven hoofed animals. This highlights that minor use permits are not easy to prepare and submit. The APVMA do not list goats as a major trade species (<http://apvma.gov.au/node/10931>) and hence minor use permits are theoretically possible. However an organisation or an individual must apply for this permit and hold it and many are very reluctant to take on this responsibility fearing liability if any residue is found in an overseas market and the market then shut-down. Growcom holds many horticulture minor use minor crop and fruit chemical permits as the Horticulture Australia Board does not want to hold these permits. Minor use permits are therefore not a solution to lack of access to veterinary medicines and needed routine husbandry treatments for goats.

- **Minor use** agvet chemicals have been mentioned in this draft report. Minor species such as goats need access to a full range of veterinary medicines and incentives are needed to encourage their addition to label statements. One extra year of data protection for additional minor species added to labels would help, but will not solve this problem. Reducing the data requirements for minor species such as goats, once registered for a major species such as sheep, may help. The requirement for residues studies to be done under GLP (Good Laboratory Practice) should be removed for minor crops and species. This would make registration easier and cheaper for minor uses. If laboratories have NATA accreditation and professional oversight e.g. by a university or government department, then this should be enough to ensure the minor use data is valid. The USA registration system does not require GLP labs and use their land grant university labs. The number of GLP labs in Australia is severely limited and often booked out months or even years in advance.
- The report mentions that more use should be made of **overseas data** in the registration process by the APVMA. This however will be of limited help as other countries have the same problem of lack of registered veterinary medicines for minor species such as goats. I think instead that we should look to New Zealand which has similar agricultural systems. If a veterinary medicine has been registered in New Zealand for 5 years and no problems have been identified seriously enough for the veterinary medicine to be under review, then it should automatically be allowed to be registered in Australia or at least imported into Australia directly by veterinarians or for over the counter products, even goat owners directly. Zolvix worm drench has been registered in New Zealand for approx. 5 years and while registered in Australia for sheep, has never been registered for goats in Australia. Yet it is widely used, generally without a veterinary prescription as it can be purchased at any farm supply store by goat owners. This means that these goat owners are under-dosing and is putting the sheep industry at risk, if resistance to Zolvix becomes widespread. In New Zealand the correct dose is on the label for goats i.e. 1.5 times the sheep dose.
- Victorian Control of Use legislation allows the use of sheep medicine “Over the Counter” products such as worm drenches and lice treatments, in goats but most other states do not. This means that goats suffer from disease unnecessarily due to the lack of treatment options in the majority of Australian states. Currently there are only 2 registered products to treat goats for lice (Pestene powder and Clout S, which is difficult to purchase). Neither of these products can be used in milking goats, even with a veterinary prescription, as the labels have “do not use” statements that vets cannot override under current legislation e.g. the Pestene label states “Goats - Milk: Do not use on lactating does where milk or milk products may be used for human consumption.” Victorian milking goats can legally be treated by their owners with sheep lice treatments as long as no residues are produced, although no service is available to owners to determine how to do this. Goat owners in other states must find a veterinarian willing to prescribe a dog or sheep product with a written with-holding periods without the support from a service to determine this legally required milk with-holding period. In the USA veterinarians can email or phone the Farm Animal Residue Avoidance Database (FARAD) or use a mobile phone app to get information about with-holding periods (WHP) for minor species such as goats when given veterinary medicines- see [www.farad.org](http://www.farad.org).

Veterinarians require more support to provide off label prescriptions for goats and other minor species. While the USA has FARAD, the UK provide “Guidance Notes” documents from the Veterinary Medicines Directorate and this suggests with-holding periods if none is

provided i.e. a minimum of 7 days for eggs & milk and 28 days for meat (Guidance Note 13, July 2013).

The Food Regulatory system must also be changed as well as the APVMA registration system, otherwise it will be legal to use vet medicines in goats, but illegal to sell the products from these goats.

New Zealand had a default Maximum Residue Limit (MRL) of 0.1mg/kg which is too high, but Australia could have one of 0.01mg/kg or 1ppm. When there is no default MRL registered by the APVMA, then the Food Safety legislation in each state requires the MRL to be zero before a food product can be sold, but some laboratories can test for some chemicals down to 1 part per billion so getting a zero MRL is almost impossible. If Health departments objected to a default MRL as they have in the past when it was suggested, then a cascade system could be used i.e.

- If no APVMA MRL then
- Use the Codex MRL used for international trade, but if none then
- Use the MRL from the USA, but is none
- Use the EU MRL, then if none then
- Use a default MRL of 0.01mg/kg or 1ppm

Limit "Do Not Use" statements on labels to real contra-indications, not merely because veterinary chemical companies do not want to do the R&D needed to establish minor species MRL and WHPs

***"Not to be Used in Goats" label statements should only be allowed if there is evidence to support it.***

When statements such as "Not to be Used in Goats" or "Not to be Used in Dairy Goats" are added to the label of veterinary medicines, it is generally because the vet medicine company does not wish to do the research needed to obtain the residue data in goats. This is a commercial decision that is accepted. However by adding these above words to labels, it makes it illegal for vets treating goats to use these vet medicines to treat goats, even though these same drugs are recommended in textbooks and overseas. It would be better to use words such as "no residue data available for goats or dairy goats in Australia" and then the private veterinarian could still use these drugs and recommend with-holding periods from overseas or textbooks with an added safety factor based on their professional knowledge. Do Not statements on labels should only be used where there is a real contraindication as very toxic to one species such as monensin in horses or aspirin in cats which will kill them, not just because the registering company doesn't want to do the R&D to determine WHP for goats milk and meat. These "do not use" statements should not because a company decides it does not want goat farmers to use their drugs e.g. because of a perceived risk of hastening the development of resistance. Instead veterinary medicine companies should educate their users, including goat owners.

Vets need to be able to use their discretion and knowledge but to do so they must either stop adding in these Do Not statements onto labels or vets must be given the legal ability to over-ride these Do Not statements.

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*Treat miniature goats as companion animals so their owners are never asked which goat to save as only 1 goat can legally be treated by a vet with an unregistered veterinary medicine as currently considered livestock.*

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- **Miniature goats** are growing in popularity with one stud's Facebook page with over 14000 fans – see <https://www.facebook.com/queensburyfarmminiaturegoatstud>. There are three miniature goat associations in Australia viz Australian Miniature Goats (<http://www.australianminiaturegoat.com.au/>), the Australian All Breeds of Miniature Goats Society Inc. (<https://www.facebook.com/groups/729627077088939/>), and the Miniature Goat Breeders Association (<http://www.miniaturegoatbreedersassociation.com.au/>) and goat registered with either group should be considered minor companion animals and not food animals. This will allow vets to legally treat more than one miniature goat on a farm with a veterinary medicine that is not registered for use in goats or with compounded vet medicines. Otherwise, according to current legislation, the owner must choose which single goat to save. The recommended heights for miniature goats are from 43.2 to 58.5cm (17" to 23") and these sizes make them unable to be processed in commercial abattoirs or to be commercially used for milk production. They are clearly pets and hence there is no danger from residues affecting export markets for Australia's feral and meat goats. If any additional safeguards are necessary then properties (or homes) with miniature goats could be classified as such on the state databases of properties with livestock and a special status on NLIS database could be used to prevent miniature goats from entering the conventional food chain. The query status could be used in NLIS for this purpose. Although in reality most wouldn't be registered for PICs or NLIS anyway.

Miniature pigs and sheep should also be considered for similar treatment under legislation.

- **Worm drenches**

The paraboss website ([www.wormboss.com.au](http://www.wormboss.com.au)) recommends that all new sheep introductions be drenched with drenched with worms drenches from four different drench families, including one of the two new worm drenches (Zolvix and Startect). However the only worm drenches registered for goats are from 2 families (plus a small paste product only suitable for 1 or 2 pet goats). Neither of the two new worm drenches are registered for goats. This puts goat farms at serious risk of introducing drench resistant worms when they purchase goats.

The paraboss website also recommends using combination drenches, yet again none are registered for goats. Similarly the paraboss website recommends using long acting products when barbers pole worms are the majority worms on faecal culture and worm egg counts are high yet no long acting drench is registered for use in goats. One drench family, levamisole or the clear drench, has no products registered for goats in Australia. However both the British Goat Veterinary Society (<http://www.goatvetsoc.co.uk>) and the American Consortium for Small

Ruminant Parasite Control ([www.wormx.info](http://www.wormx.info)) recommend its use, and at a higher dose rate than sheep. Similarly many liver fluke drenches are not registered for goats reducing the rotation options, which will eventually lead to drench resistance.

Most goat owners already use sheep worms drenches<sup>1</sup> and this is leading to resistance as they are not using them with a veterinarian's prescription and hence not at the correct dose rates. Goats metabolize these drenches at a faster rate and need between 1.5 times to double the sheep dose rate.

- Like the National Farmers Federation, I do not support the moving of the APVMA, unless a business case supports this as being cost effective. If the APVMA does move, then the staff in the Health and Environment departments e.g. in the Office of Chemical Safety staff, must be transferred to the APVMA and moved as well.
- I do not support GHS labelling on veterinary medicines as they are unnecessary and confusing. The APVMA uses a risk based approach, while GHS uses a hazard based approach. State departments of agriculture did not support this change to add GHS information to labels.

One veterinary prescription form for all states & territories
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- The mutual recognition of veterinary registrations is greatly appreciated as a red tape reduction, especially for vets like myself that work in more than one state, but an additional step is needed. Currently every state has slightly different veterinary prescription requirements for livestock with Queensland requiring the most information to be provided to the owner and to be kept for 2 years including information that is already available on the APVMA website or their mobile-phone App. Some states classify goats as trade species or minor trade species and the APVMA do not regard goats as a major species so the situation is very complicated for vets working in different states. See Appendix 1 for the different requirements for veterinary prescriptions in each state. Prescriptions should be the same for all states and only need the minimum needed information e.g. product name, the with-holding period, dose, instructions, vet's & animal owner's names and addresses.

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## Appendix 1

### Legislation for Veterinarians Prescribing Veterinary Medicines for Goats

The control of the use of veterinary chemicals, such as worm drenches, is the responsibility of states and territories as soon as it leaves the veterinary medicines wholesalers or farm store. Prior to that i.e. during importation, manufacture, packaging or registration, it is the responsibility of the Australian Pesticides and Veterinary Medicines Authority (APVMA).

Key aspects of the various state legislation that covers the use of drenches or other anthelmintics “off label” for goats by veterinarians, are summarized below.

#### ACT

Key Points:

- Environmental legislation is used and an agvet chemical entering the environment is taken to cause harm unless it is:

- Used in accordance with an APVMA registration

or

- Used by a veterinarian or according to a veterinarian’s instructions

Links to actual legislation:

Environmental Protection Regulation 2005

<http://www.legislation.act.gov.au/sl/2005-38/current/pdf/2005-38.pdf>

No mention is made of the exact information that must be included in the vet’s instructions.

#### New South Wales

Key Points:

- New Biosecurity legislation currently under development will cover some aspects of chemical residues

- A veterinary medicine not registered for use in another food producing animal, can only be used by a veterinarian on one goat in the herd.

- Goats are considered a major food producing species

- Veterinarians must record full particulars of all off - label treatments including vet’s name and address, date, identification of animals, person in charge of animals, identity of the stock medicine, active ingredient, type of stock, with-holding period, treatment dose rate, frequency and method of administration. Records must be kept for 2 years.

Links to actual legislation:

Stock Medicines Act 1989

<http://www.legislation.nsw.gov.au/inforce/a97c3fac-6eaf-4955-ba66c89fc343d61c/1989-182.pdf>

## Stock Medicines Regulations 2010

[http://www.austlii.edu.au/au/legis/nsw/num\\_reg/sma1989smr20102010452l20a2010519.pdf](http://www.austlii.edu.au/au/legis/nsw/num_reg/sma1989smr20102010452l20a2010519.pdf)

### Northern Territory

#### Key Points:

- In certain situations a veterinarian may prescribe uses for a registered veterinary product contrary to an approved label provided the following information is supplied: name and contact details of veterinary surgeon, product name and details, dose and frequency plus period of use, route of administration, species of animal to be used on, and with-holding period if used in a food producing animal. Other information may also be needed.
- As soon as practical information on the with-holding period must be given in writing as well as the name and contact details of the veterinarian and practice, name of the product and date it was administered.
- These records of use of veterinary medicines in food producing animals must be kept by the veterinarian for 2 years.

#### Links to actual legislation:

[Agricultural and Veterinary Chemicals \(Control of Use\) Act](#)

[Agricultural and Veterinary Chemicals \(Control of Use\) Regulations](#)

### Queensland

- Goats are not classified as major trade species (which include sheep and cattle)
- Veterinarians can prescribe a drench used in sheep or cattle for use in goats, unless there is a restraint statement on the label
- The veterinarian must include the with-holding period, drench name, its APVMA registration number, active ingredient, treatment dose frequency and period, how the product is to be used, species, identity of animal, date, expiry date of product, name and address of both the vet and the goat owner plus for any recommendation, how long this recommendation applies. Records must be kept for 2 years
- New Biosecurity legislation will cover some aspects of chemical residues

#### Links to actual legislation:

[Chemical Usage \(Agricultural and Veterinary\) Control Act 1988](#)

[Chemical Usage \(Agricultural and Veterinary\) Control Regulation 1999](#)

## South Australia

### Key Points:

- Goats are considered a minor trade species animal on which cattle or sheep (major trade species animal) products can be legally used.
- Veterinarians can prescribe 'off-label' under certain conditions and responsibilities i.e. the details of the treatment, including the treatment period and with-holding period.
- Legislation also requires the goat to be identified and also that the veterinarian must keep a copy of these written instructions for at least 2 years.

### Links to actual legislation:

[South Australia Agricultural and Veterinary Products \(Control of Use\) Act 2002](#)

[South Australia Agricultural and Veterinary Products \(Control of Use\) Regulations 2004](#)

## Tasmania

### Key Points:

- New Biosecurity legislation may cover some aspects of chemical residues
- An advice notice or label must be provided by a veterinarian

### Links to actual legislation:

[Agricultural and Veterinary Chemicals \(Control of Use\) Act 1995](#)

[Agricultural and Veterinary Chemicals \(Control of Use\) Regulations 2012 \(S.R. 2012, No. 10\)](#)

## Victoria

### Key Points:

- Worm drenches sold over the counter for sheep can be used by anyone on goats but only at the stated label dose rates. A veterinarian's prescription is needed for using sheep worm drenches at the correct dose rates in goats and to obtain relevant meat and milk withholding periods.
- Basically, the label or advice note provided by the veterinarian should have:

- the words 'KEEP OUT OF REACH OF CHILDREN' in red on a white background
- if the substance is intended for external use only, the word 'POISON' or the words 'FOR EXTERNAL USE ONLY' in red on a white background
- the words 'FOR ANIMAL TREATMENT ONLY' Plus the veterinarian's business name, address and telephone number,

the identity of the animal(s) to be treated; e.g. tag number, species, breed, age, sex, the name of the animal's owner or person in charge, the date the product was used or sold, the trade name which unambiguously identifies the poison or controlled substance and its strength, and form, or the name of the active constituent and its strength and form for unregistered products, the quantity in the container, adequate directions for treating the animal with the product including the method of administration, dose rate, dose frequency and number of days of treatment and the withholding period or the statement 'Nil withholding period required' when treating food producing animals.

The text must be 1.5mm or larger.

- In addition a Veterinary Advice Note may be required for “off label” use and a template is provided on the website above.

A copy must be provided to the person in charge of the goats and a copy kept by the veterinarian.

Links to actual legislation:

[Agricultural and Veterinary Chemical \(Control of Use\) Regulations 2007](#)

[Drugs Poisons and Controlled Substances Regulations 2006](#)

Other helpful links:

- Advice to veterinarians about labels and advice notes is explained on this Victorian government website

<http://agriculture.vic.gov.au/agriculture/farm-management/chemicaluse/veterinary-chemicals/veterinary-practitioner-requirements>

- <https://www2.health.vic.gov.au/public-health/drugs-and-poisons/other-registered-health-practitioners/veterinary-practitioners-medicines-regulation>

- <http://agriculture.vic.gov.au/agriculture/farm-management/chemicaluse/agricultural-chemical-use/chemical-use-legislation>

## Western Australia

Key Points:

- Goats are not considered a major trade species, but a minor trade species and therefore a registered chemical product can be used on goats by a veterinarian even if not registered for goats
- A veterinarian must not prescribe or supply a veterinary chemical product unless it is done as part of the practice and for a particular condition for animals under the care of the veterinarian

- A person must not use a registered veterinary chemical product on a goat unless it is registered for use in goats or they have a veterinarian's written instructions. However if the veterinary chemical product is registered for use in a major trade species (cattle or sheep) then it can be used on goats unless there is a restraint or precaution on the label or it is used by injection without this being stated on the label.

Links to actual legislation:

- Veterinary Preparations and Animal Feeding Stuffs Act 1976
- Veterinary Chemical Control Regulations 2006

Other helpful links:

[https://www.slp.wa.gov.au/legislation/statutes.nsf/main\\_subsif\\_v.html](https://www.slp.wa.gov.au/legislation/statutes.nsf/main_subsif_v.html)

Lyndal-Murphy, M., P. B. James, P., R. Watts and S. A. Baxendell (2007). Options for the control of parasites in the Australian Goat Industry- A situational analysis of parasites and parasite control. Sydney, Meat & Livestock Australia 107.

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<sup>i</sup> Lyndal-Murphy, M., P. B. James, P., R. Watts and S. A. Baxendell (2007). Options for the control of parasites in the Australian Goat Industry- A situational analysis of parasites and parasite control. Sydney, Meat & Livestock Australia 107.