Goat Veterinary Consultancies - goatvetoz

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Agvet Chemicals Regulation Reform, M.6.137
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Submission on Proposed Agricultural and Veterinary Chemicals Legislation Amendments

1 Specific Questions from Consultation Paper

- ***Implementing the election commitment to remove re-registration***

Supported- especially as veterinary medicines used on goats may not have a market large enough for a veterinary medicine company to justify the effort to support re-registration. The adverse experience reporting program will provide the necessary consumer protection along with the obligation for companies to report any information that they collect that is negative and would have affected their registration if it was known then.

- **Reducing red-tape by allowing for less frequent renewal of registrations**
  Supported – reduced red tape should reduce costs
- **Addressing concerns with chemical product quality**
  Supported - as asking companies to provide proof of analysis is a good safe guard. It is noted however that some overseas analyses and documentation have been forged and hence Australian laboratories with NATA accreditation should be the only labs used.
- **Reducing red-tape by allowing for simpler variations to approvals and registrations**
  Supported – reduced red tape should reduce costs
- **Reducing red-tape by no longer requiring annual returns about active constituents**
  Supported – reduced red tape should reduce costs
- **Improving efficiency by requiring electronic lodgement of information and fees**

  Supported – electronic submission has reduced errors in other similar organisations esp. if explanations, a good help function and just in time training is combined with the electronic submission. These support tools will be essential for permits, essential for minor use permits where inexperienced applicants are common.

- **Obliging access to information about chemicals that the APVMA holds**
  Supported – fees will reduce demand and then will free up APVMA staff time or the fee will help employ more APVMA staff
- **Other amendments consequential to existing reforms**
  No comment

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3 Other matter not mentioned in the Consultation Paper

i. Miniature Goats should be classified as companion, not food animals

Miniature goats are growing in popularity with one stud's Facebook page with over 4000 fans – see https://www.facebook.com/queensburyfarmminiaturegoatstud. There are two miniature goat associations in Australia (http://www.australianminiaturegoat.com.au/ and http://www.miniaturegoatbreedersassociation.com.au/) and goat registered with either group should be considered 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 bantams should also be considered for similar treatment.

ii. FARAD equivalent needed for Australia

Goat farmers in the USA have an advantage as their veterinarians can access via phone or mobile app, the FARAD service of the USDA. FARAD is the Food Animal Residue Avoidance Database – see http://www.farad.org/ and is supported by the US Department of Agriculture and various veterinary schools of US Universities. This allows veterinarians to get up-to-date information about with-holding periods that are not stated on the labels of veterinary medicines, mainly because the animal being treated is a minor species. Australian veterinarians need a similar service based in the federal department of Agriculture, Fisheries & Forestry (DAFF). DAFF could investigate if it is possible to just use the FARAD mobile phone app in Australia as many veterinary medicines would be similar.

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

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. Currently there are no coccidiostats legally available to use in dairy goats in Australia e.g. the Label for "Rumensin" (monensin) states "DO NOT USE in sheep or goats which are producing or may in the future produce milk where the milk or milk products may be used for human consumption. ", thereby making it impossible for a veterinarian to prescribe in an outbreak of coccidiosis in dairy goat kids. Coccidiosis is a very common disease in goat kids and rumensin is a recognised prevention in many goat textbooks.

"Not to be used" statements should only be used when there is an animal welfare or adverse experience reason e.g. Not to be used in kids/lambs under 10kg. They 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.

iv. Extra support for Permit Applicants

Goat industry organisations have been encouraged to apply for minor use permits to overcome their limited access to vet medicines and worm drenches. It is essential that additional assistance is provided to minor use applicants as most applicants will be doing their first application and the system is very complex. With the proposed tighter timelines and limiting the opportunity to once only to provide missing information, it is essential that just in time training be available online and also videos showing exactly what is needed to be done be on the APVMA website.

v. Continued access to compounding vet medicines by veterinarians

There is a strong need for compounded veterinary medicines, especially for minor species. The Australian Veterinary Association (AVA) policies are supported in this regard. While I accept that vet medicine manufacturers have to pay large sums for Good Manufacturing Practices accreditation, compounded vet medicines are needed for a minority of cases and are essential tools for vets. Better compliance will stops any abuses and with the new regulations, the APVMA compliance team will have all the tools they need. The AVA has reported suspicions of misuse of compounding in the past so there is intelligence to support the APVMA's compliance efforts.