December 19, 2017

Ministry of Agriculture Food and Rural Affairs
c/o Vicky Grahovac
Food Safety and Environmental Policy Branch
1 Stone Road West
Guelph, ON N1G 4T6

Thank you for the opportunity to respond to the consultation regarding the “Proposed Amendment to the Schedule to Ontario Regulation 730 (General) under the Livestock Medicines Act” (Proposal Number: 17-MAFRA008). OVMA has reviewed the proposed amendment and would like to provide the following feedback:

The most significant change to the regulation under this proposal is the removal of medically important antimicrobials (MIAs) from Livestock Medicines Outlets (LMOs). OVMA is supportive of the federal government’s framework to address antimicrobial resistance and this is a significant step towards its implementation. Therefore, this amendment is an expected and positive development that OVMA fully supports.

The proposed regulation also amends the list of products that are permitted to be sold in an LMO. OMAFRA staff previously indicated that it would be helpful for OVMA to confirm that, aside from the removal of MIAs, the new format of the list would maintain the status quo. OVMA has reviewed the draft list and can confirm that the list would achieve this goal.

Finally, the consultation document seeks input for the government’s consideration to determine where OTC veterinary drugs should be made available and with what (if any) restrictions. OVMA is concerned that many drugs are available to producers in Ontario without any veterinary involvement. This creates an environment of significant risk, as producers could accidentally be advised by non-veterinarians to use an incorrect medication. In addition, the availability of medications from non-veterinarians could result in producers bypassing a proper medical assessment which could result in missed illnesses or disorders. To provide the best protection of animal and human health, medication should only be available from veterinarians, or from pharmacies dispensing medications prescribed by a veterinarian. A properly-trained medical professional is best-equipped to provide advice on adverse reactions that may be associated with OTC products.

If you have any questions regarding this response, please contact OVMA’s Manager of Government and External Relations, John Stevens at jstevens@ovma.org or 800.670.1702, ext. 24.

Sincerely,

Kathleen Norman, DVM
President