



September 11, 2015

Jan Robinson
Registrar and Chief Executive Officer
College of Veterinarians of Ontario
2106 Gordon Street
Guelph, Ontario N1L 1G6

Dear Ms. Robinson,

Re: Antibiotic Use in Food Producing Animals and Opportunities for Veterinary Stewardship

Beef Farmers of Ontario (BFO) appreciates the opportunity to provide feedback on the College of Veterinarians of Ontario's (CVO) draft report, *Antibiotic Use in Food Producing Animals and Opportunities for Veterinary Stewardship*, and its recommendations regarding the veterinary stewardship of antibiotic use in food-producing animals. BFO represents the 19,000 beef producers in Ontario by advocating in the areas of policy planning, industry development and research, and domestic and export market development.

BFO supports Ontario beef farmers in their decisions to use approved products in their production programs, as well as the decisions made by Health Canada in determining what products can be used safely. Ontario's beef farmers are concerned about the issue of antimicrobial resistance, and BFO recognizes that the use of antimicrobials in human and animal medicine could contribute to resistance and affect our future ability to treat people or animals that require antibiotic treatment. However, in much the same way as veterinarians, beef farmers feel that it can sometimes be a challenge to achieve a balance between decreased antibiotic use and animal welfare.

Within the CVO's project and draft report, veterinarians identified the Own Use Importation (OUI) loophole, importation and compounding of Active Pharmaceutical Ingredients, and widespread product availability over the counter through lay outlets and without a prescription as current challenges regarding antibiotic use. The report expresses a need for increased veterinary oversight of antibiotic use, including having antibiotics only available through a veterinary prescription. While enhanced veterinary oversight for some classes of medically important drugs is a positive development in order to prevent



misuse, it is currently unclear what will constitute “veterinary oversight”. We are keenly interested in staying informed of any developments from CVO regarding any proposed changes, as more details become available. Any move toward reducing antibiotic availability to producers by eliminating over-the-counter options should be done with caution and consultation with industry, as convenient supply isn’t always maintained and remote locations cannot always be serviced by the current veterinarian network. Over-the-counter antibiotics should remain an available option if a producer has a current veterinary-client-patient relationship.

We share the objective of moving towards use of antibiotics in cattle that is prudent and sustainable, while minimizing the potential for negative impacts on animal and human health. Antimicrobials are an important tool in protecting animal health and well-being, and over 90% of antimicrobials used in beef production are of a class that is not used for human health. Prophylactic drug use is a very effective animal health option for certain operations when done under vet advice, and should be maintained as an option to reduce treatments of more severe outbreaks.

Though the future OUI rules and changes to labelling requirements and regulations for growth promotants have not yet been finalized by government, the establishment of clearer guidelines around these important issues is, in general, a good step. We also strongly agree with the recommendation and position, as stated in the report, that proposed changes should have no increased regulation cost for producers or veterinarians, and no negative impacts on profits and production.

BFO strongly supports the call for increased education and training, and is specifically interested in seeing the reinstatement of the Livestock Medicines Education Program. Funding for the tuition cost should be made available to producers interested in participating in this program. We also echo the report’s support for Quality Assurance (QA) programs for producers, and we endorse industry-developed QA programs in particular. The Verified Beef Production (VBP) program is an excellent example of a program developed with industry representatives to ensure the production of safe, high-quality beef in an environmentally friendly manner. VBP includes guidelines on the proper use of antimicrobials.

In addition, research initiatives regarding antimicrobial resistance should include development of credible alternatives to antibiotics, but should also include systemic review of existing data. Sufficient, verifiable and replicated research is desperately needed to justify and support any proposed changes regarding antibiotic use before decisions are made or promoted.

BFO would like to thank CVO for the opportunity to comment on *Antibiotic Use in Food Producing Animals and Opportunities for Veterinary Stewardship*. We would be pleased to meet with you to discuss the contents of this letter and we look forward to participating in further consultations on this important issue.



Sincerely,

A handwritten signature in black ink, appearing to read "Bob Gordanier". The signature is written in a cursive, flowing style.

Bob Gordanier
President

cc: BFO Board of Directors

