Letters to the Editor Lettres à la rédaction

Extra-label drug use in food-producing animals in Canada

Dear Sir,

I was surprised when reading the Special Report *"Health Canada's Policy on Extra-Label Drug Use in Food-Producing Animals in Canada"* in the July 2008 issue of *The Canadian Veterinary Journal* not about what was in the Report but more about what was not in it. While we agree with the four key elements of Health Canada's ELDU policy we think three pivotal additions need to be added to ensure proper ELDU of medications. As a representative of the regulated animal health industry, members of the Canadian Animal Health Institute (CAHI) place great emphasis on both pre- and post-market product requirements. In an ideal world CAHI members wish that practitioners had licensed product for all the medical needs they face. This, however, is not possible so we are supportive of the practice of ELDU within the context of the following three parameters;

- the CVMA Compounding Decision Cascade,
- application of the services of the Canadian Global Food Animal Residue Avoidance Database (CgFARAD) and,
- recognition of post-marketing pharmacovigilance and adverse-event reporting requirements.

These additional parameters are critical risk management "tools" to the practicing veterinarian.

CVMA in 2005 published Guidelines for the Legitimate Use of Compounded Drugs in Veterinary Medicine. Health Canada's Veterinary Drugs Directorate was represented on a multi-sector taskforce charged with developing a decision-making framework for the veterinary profession and the use of compounded product (see below.) No mention of the Cascade appears in Health Canada's ELDU Policy, or the CVJ article. There is also no mention of Health Canada's Emergency Drug Release Policy as a mechanism to deal with ELDU.

CAHI also thinks the important services of CgFARAD should be recognized in the policy. CgFARAD is a science based, risk assessment and management resource available for food animal veterinarians to ensure judicious ELDU to avoid harmful residues entering the food chain in the absence of a Canadian licensed animal drug.

Lastly, the policy does not emphasize the importance of adverse event reporting requirements. These need to be emphasized to ensure ELDU concerns in human, animal or environmental safety are recognized thereby providing the potential for measures to be taken to communicate and avoid continued ELDU practices that contribute to negative safety outcomes.

With mainstream media stories linking food borne illness to use of drugs in animals, one would hope that veterinarians are taking every precaution to avoid drug residues in our food supply and antimicrobial resistance concerns. CAHI recommends incorporation of the CVMA Compounding Decision Cascade, the CgFARAD services, and adverse event reporting requirements into the ELDU policy.

Jean Szkotnicki, President
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Decision Cascade

When deciding on which medication to prescribe, a veterinarian should follow the course of the Decision Cascade and choose the level of least risk to the patient. Choose the first available level on the cascade below:

Approved veterinary drug (DIN): label instructions

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Approved veterinary drug (DIN): extra-label drug use (ELDU)

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Approved human drug (DIN): ELDU

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Compounded product: from approved veterinary drug (DIN): ELDU

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Compounded product: from approved human drug (DIN): ELDU