

## Background to CQA® Drug Use Policy

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The issues related to the proposed drug use policy were first addressed by the CQA® Technical Working Group (TWG) in October of 2000. At that time, the group discussed the issues related to the importation and use of Active Pharmaceutical Ingredients (API) and the Own-Use Provision of the Food and Drugs Act and the potential implications of these on the Canadian hog industry. The outcome of the discussion at this meeting was to open a consultation period with CQA® validators. Two statements were put forward for consideration during the consultation period. The first called for the restriction of drug use to only those products that have been approved for use in food-producing animals in Canada. The second statement called for the restriction of drug use to only those products that bear a Canadian Drug Identification Number (DIN).

In March of 2001, the CQA® Advisory Committee (CQAAC) addressed the topic. The input from the consultation period with the validators was presented in a report and the issues discussed. A drug use policy was drafted and targeted for implementation as of April 1, 2002. In the months following the release of information regarding the implementation of the policy, various concerns were expressed and requests were made to review the policy.

In response to this request, the CQAAC called for the creation of a veterinary sub-committee in October of 2001. During the winter of 2001, the swine practitioner organizations in the west, Ontario and Quebec were contacted and asked to nominate a representative to this committee. Each organization agreed to take part and named a representative. Dr. Walter Heuser represented the Western Canadian Association of Swine Practitioners, Dr. George Charbonneau, the Ontario swine practitioners and Dr. Andre Broes, the Quebec swine practitioners. Dr. Dan Hurnik, CVMA representative to the CQAAC and a veterinarian with the Atlantic Veterinary College was named as chair of the committee.

The committee members debated the issues via e-mail and conference call beginning in February and ending with a meeting between the Veterinary sub-committee and the TWG in Winnipeg on October 2, 2002. Concern was expressed that the proposed policy did not go far enough in that it did not call for an immediate end to the use of APIs and the "own-use" exemption. At the same time, concern was also expressed that the policy may be too strong in calling for the eventual requirement of only DIN products.

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Some of the discussion addressed the fact that there are fewer therapeutic compounds available in Canada than are available in other countries. It was suggested that the approval process in Canada was too long to bring medications to market. It was suggested that this inadequacy may be contributing to the practice of prescribing products not licensed for food animals in Canada or to use APIs. The committee made several recommendations to address this including the establishment of regular discussion between CPC and Health Canada at the highest possible level to inform Health Canada of the therapeutic compounds that are needed. The Emergency Drug Release (EDR) program was held up as an example of how product access can be expedited under the supervision of Health Canada. The committee also recommended that the CVMA's prudent use guidelines for antimicrobial use be included in the CQA® materials.

The recommendations for the policy and for activities related to the policy were brought forward to the CQAAC on November 4-5, 2002 for discussion.

The following recommendations were agreed to:

1. That the first phase of the CQA® policy will require that all drugs used on CQA® validated farms be licensed for food animal use in Canada and that this phase be implemented at the time of the release of the updated CQA® program materials currently targeted for mid-2003.
2. that the own-use exemption be eliminated at the time of the implementation of the policy.
3. That the second phase of the CQA® policy will require that all drugs used on CQA® farms carry a valid DIN number and that this phase be implemented 2 years following the implementation of the policy.
4. That the veterinary sub-committee be maintained both for general consultation and specifically that it be mandated to meet routinely to identify and prioritize the need for specific medications for the swine industry with the support of sound reasons for their selections.
5. That the CVMA's judicious use guidelines for antimicrobials be incorporated in the CQA® materials
6. That the provincial veterinary registering bodies be notified of our position on drug use, that they be supplied with our Drug Use Policy and to notify them of the availability of documents related to decision making for the selection of medications for practitioners who work with swine.
7. That we ask Dr. Dan Hurnik to contact the CVMA regarding the development of a decision tree for the selection of medications.