



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

100 Stone Road West, Suite 206, Guelph, Ontario N1G 5L3  
Tel: (519) 821-8883 • Fax: (519) 821-8810 • [www.ofa.on.ca](http://www.ofa.on.ca)

January 15, 2018

Vicky Grahovac  
Food Safety and Environmental Policy Branch  
Ontario Ministry of Agriculture, Food, and Rural Affairs  
1 Stone Road West  
Guelph, ON N1G 4Y2

Email: [antimicrobialresistance@ontario.ca](mailto:antimicrobialresistance@ontario.ca)

Dear Ms. Grahovac,

**RE: Registry Posting: 17-MAFRA008: Proposed Amendment to the Schedule to Ontario Regulation 730 (General) under the Livestock Medicines Act**

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 37,000 family farm businesses across Ontario. These farm businesses form the backbone of our robust food system, and rural communities, with the potential to drive the Ontario economy forward.

Antimicrobials play a critical role in maintaining the health of both humans and animals, helping to assure animal health and welfare, food safety and quality, as well as farmer livelihoods. They also play an important role in treatment to control and prevent the spread of disease to other livestock and humans. Over- and misuse of antimicrobials in human and animal medicine can contribute to resistance. Prudent and responsible use is essential to ensure antimicrobials remain an available and effective tool in the treatment of humans and animals.

While OFA fully supports measures to help combat antimicrobial resistance, we do not support the proposed changes to Regulation 730 under the *Livestock Medicines Act (LMA)* that would remove medically-important antimicrobials (MIAs) from Livestock Medicine Outlets (LMOs), and limit the sale and dispensary solely to veterinarians. We understand the need for sensible and judicious use of antimicrobials in agriculture. However, we feel it is unclear whether limiting the sale of MIAs through LMOs will achieve a reduction in antimicrobial resistance.

The Ontario government should conduct a regulatory impact assessment of the proposed changes to Regulation 730. Relying on the assessment conducted regarding federal changes to the *Food and Drug Regulations* is not sufficient to know the true impact of these proposed provincial regulatory changes. The proposed amendments to Regulation 730 exceed the scope of the federal impact assessment related to veterinary drugs and antimicrobial resistance. Therefore, OFA calls on OMAFRA to conduct a formal Regulatory Impact Assessment on the proposed regulatory changes. This assessment should clearly demonstrate how the proposed changes prohibiting the sale of MIAs from licensed LMOs will contribute to the reduction of antimicrobial resistance, including a cost-benefit analysis to farmers, veterinarians, pharmacists, LMOs and the public.

OFA is concerned that Ontario livestock farmers, especially in more remote regions of Ontario where veterinarian services are limited, would be significantly disadvantaged if their current access to livestock medicines through retail outlets is restricted or removed. Mapping analysis conducted by OMAFRA shows that most farmers are within a one-hour radius of a veterinarian. However, some veterinarians have very specialized practices. OMAFRA's mapping analysis should be redone excluding veterinarians who will not treat all species of farm livestock and poultry. Farmers in some parts of the province, especially those in Northern Ontario, have limited access to veterinarian services. Distance, availability, and specialty of a veterinarian pose significant barriers to obtaining MIAs in a timely manner. In the absence of an effective and timely response, these situations could threaten the health and welfare of the livestock, and ultimately the sustainability of the farmer's business.

OFA is also concerned Ontario farmers may face increased costs to obtain MIAs due to the proposed amendment. Establishing a Veterinarian-Client-Patient-Relationship (VCPR), necessary to obtain a prescription, may require more frequent farm visits and therefore increased veterinarian expenses. While we understand that a VCPR could help increase livestock health due to increased veterinary interaction, authorizing veterinarians to prescribe and sell MIAs may result in increased drug costs. Currently, farmers may compare MIA prices among LMOs.

OFA recommends that LMOs continue to sell MIAs with a valid veterinary prescription. There are currently over 500 licensed LMOs in Ontario which are competent to dispense livestock medicines. These licensed outlets are more than capable of distributing medications with a valid prescription, as many will continue to sell mixed-feed rations including MIAs which will require a prescription to purchase.

While OFA is not opposed to prescription requirements for MIAs, we believe greater investment needs to be made to enable the use of electronic prescriptions where a VCPR exists, facilitating access to prescriptions when needed. Efficient and timely access to prescriptions would help to ensure animal health and welfare is not compromised, and a sustainable livelihood for Ontario farmers. Furthermore, increasing surveillance data such as MIA sale and consumption volumes, could prove an important tool identify and mitigate antimicrobial resistance, and support consumer confidence regarding the use of MIAs in agriculture.

OFA supports existing oversight requirements regarding over-the-counter vaccines and other biologics, and believe no additional restrictions are necessary. OFA believes existing requirements for outlets related to expiry dates, storage requirements, sales records, etc. are adequate, and do not warrant any changes at this time.

On behalf of our more than 37,000 farm family businesses across Ontario, OFA appreciates the opportunity to comment on the proposed changes to Regulation 730 under the *Livestock Medicines Act*.

Sincerely,



Keith Currie  
President

cc: Dr. Leslie Woodcock, Chief Veterinarian for Ontario  
OFA Board of Directors