



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

September 17, 2018

The Honourable Ernie Hardeman
Minister of Agriculture, Food and Rural Affairs
77 Grenville Street
Toronto, Ontario
M7A 1B3

Dear Minister Hardeman:

The Ontario Federation of Agriculture (OFA) is very concerned with proposed change to Regulation 730 under the *Livestock Medicines Act*. While the intent is laudatory, the regulatory change will negatively impact farmers and their livestock without clearly achieving the objective.

Antimicrobials are essential in maintaining the health of both humans and animals, helping to assure animal health and welfare, food safety and quality, and farmer livelihoods. They help to control and prevent the spread of disease to other livestock and humans. As antimicrobial use 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 future.

In an effort to combat antimicrobial resistance (AMR), proposed changes to Regulation 730 under the *Livestock Medicines Act* would remove medically-important antimicrobials (MIAs) from Livestock Medicine Outlets (LMOs) and limit the sale and dispensary solely to veterinarians.

While OFA fully supports measures to help combat AMR, we feel it is unclear whether the proposed changes to Regulation 730 will help achieve this goal. As such, OFA requests a Regulatory Impact Assessment be conducted, including a cost-benefit analysis to farmers, veterinarians, pharmacists, LMOs, and the public.

OFA is concerned that distance, availability, and veterinarian specialization pose significant barriers to obtaining MIAs in a timely manner, especially to Ontario livestock farmers in more remote regions of Ontario where veterinary services are limited. Timely access to MIAs is essential to ensure animal health and welfare is not compromised, and to safeguard a sustainable livelihood for Ontario farmers. OFA is also concerned that establishing a Veterinarian-Client-Patient-Relationship (VCPR) needed to obtain a prescription may increase costs to obtain MIAs.

OFA recommends that the 500 licensed LMOs in Ontario continue to sell MIAs with a valid veterinary prescription. 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.

Minister, we would welcome the opportunity to discuss our comments and concerns in greater detail. We look forward to working with you to help promote prudent antimicrobial use in Ontario.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Currie". The signature is fluid and cursive, with the first name "Keith" written in a larger, more prominent script than the last name "Currie".

Keith Currie
President