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CANADIAN PUBLIC HEALTH ASSOCIATION
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Veterinary Drugs Directorate
Health Canada, Health Products and Foods Branch
Holland Cross Complex
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**Public Consultation on Proposed amendments to the *Food and Drug Regulations* Veterinary Drugs –
Antimicrobial resistance (AMR)**

To whom it may concern:

On behalf of the Canadian Public Health Association (CPHA), I am writing to have the public health perspective on the above-noted regulatory proposals included in the current public consultations.

In June 2014, CPHA released a Statement of Concern regarding the “Use of Medically Important Antimicrobial Compounds in Animal Agriculture” a copy of which is attached for your information. Four recommendations were provided:

- Their use in animal agriculture be restricted to the treatment of disease under the direction of a veterinarian;
- Medically-important antimicrobial compounds be prohibited from use in animal agriculture;
- The “own use” provision for the importation of antimicrobial compounds be rescinded from the *Food and Drugs Act* and *Regulations*; and
- Surveillance activities be implemented to better identify the types of antimicrobial compounds used in animal agriculture and the full extent of their use.

The statement was shared with government officials and non-governmental organizations, alike. Since that time, the Association has noted the recommendations included in the report of the Office of the Auditor General concerning antimicrobial resistance, and the steps taken by the Health portfolio to address said recommendations.

When the spectrum of Health Canada activities related to AMR are considered, many of the concerns raised in CPHA’s 2014 Statement are being addressed. Specifically, the proposed reporting requirement for manufacturers and importers should address the concern regarding enhanced surveillance activities, while the proposed restriction should address the issue of the ‘own-use provision’.

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The proposed controls regarding good manufacturing practices (GMP), establishment licensing (ELs) and active pharmaceutical ingredients (APIs) would appear to provide additional controls to limit the use of medically important antimicrobials in animal agriculture. Similarly, Health Canada's current categorization of antimicrobials that are important in human medicine address, in part, that concern; it is important, however, that the additional work to address Category II antimicrobials be completed.

Finally, the provision for a licensing process for the sale of Veterinary Health Products could provide a quick but controlled approach to permitting the sale of such low-risk products, much as the sale of natural health products regulations meets the demand for those products within the human population.

On behalf of CPHA, I congratulate Health Canada on proposing these measures and we look forward to their promulgation and enforcement.

Sincerely,



Ian Culbert
Executive Director

About CPHA

Founded in 1910, the Canadian Public Health Association (CPHA) is the independent voice for public health in Canada with links to the international community. As the only Canadian non-governmental organization focused exclusively on public health, CPHA is uniquely positioned to advise decision-makers about public health system reform and to guide initiatives to help safeguard the personal and community health of Canadians and people around the world. CPHA is a national, independent, not-for-profit, voluntary association. CPHA's members believe in universal and equitable access to the basic conditions which are necessary to achieve health for all.

Our Vision

A healthy and just world

Our Mission

CPHA's mission is to enhance the health of people in Canada and to contribute to a healthier and more equitable world.

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