Dear Editor:

Re: CMAJ News Article April 8th, 2009 “Industry-led committee urges delay in closing loophole allowing import of unapproved antibiotics for animals”:

The authors of the recent CMAJ article on Health Canada’s Own Use Importation provision (OUI) raise some important issues that the Canadian Veterinary Medical Association (CVMA) would like to address and clarify. The OUI Task Force Report did not “urge delay in closing loophole…”. The Task Force recommends that legislation be introduced to close the OUI loophole, while piloting a restricted import permit program (RIPP). Canada’s legislative process requires two to three years for a regulatory amendment to receive parliamentary approval. To suggest this is a delaying tactic is false.

The Task Force did not call for further study of the OUI issue. Instead it recommended an advisory committee be formed that reviews the requests and makes recommendations to Health Canada’s Veterinary Drug Directorate (HC-VDD) on the drugs to be considered eligible for importation under the RIPP. The statement made in the article that there was “no concern for the issue of human resistance to antibiotics” is incorrect.

The article does not refer to the mandate of the Task Force, which was to examine a more restricted approach to OUI of veterinary drugs into Canada, not active pharmaceutical ingredients (API). The CMAJ article drifts from OUI to focus on antimicrobials imported as APIs. The CVMA does not support the importation/use of APIs. Furthermore, the article references cephalosporin and fluoroquinolone which is misleading, as these prescription antimicrobials are not imported into Canada under OUI provisions.

The CVMA continues to show leadership in responsible antimicrobial use, and recently developed “Antimicrobial Prudent Use Guidelines” for livestock. The antimicrobials listed are divided into categories based on HC-VDD’s “Categorization of Antimicrobial Drugs Based on Importance in Human Medicine”.

It is hoped that the human medical and veterinary medical professions will continue to further the concept of “One Health”, and within this construct such issues as responsible antimicrobial use and antimicrobial resistance in all species will be addressed directly.

Best regards,

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