



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

114th Annual Meeting ~ November 11-17, 2010

Minneapolis, MN

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**RESOLUTION NUMBER:** 27 APPROVED

**SOURCE:** COMMITTEE ON PHARMACEUTICALS

**SUBJECT MATTER:** SUPPORT FOR VETERINARY CONSULTATION IN ANTIBIOTIC USE

#### **BACKGROUND INFORMATION:**

Some antimicrobials are available in various forms (feed, injectable, intramammary, etc) as over the counter (OTC) drugs without veterinary prescription. The level of veterinary oversight and involvement in the use of OTC antimicrobials is arguable, as is their contribution to human antimicrobial resistance trends. Some antimicrobials require a veterinary prescription and are regulated by individual states. Although the American Veterinary Medical Association Principles of Veterinary Medical Ethics indicate that dispensing or prescribing a prescription product requires a Veterinarian-Client-Patient Relationship (VCPR), not all state veterinary practice acts, and therefore state laws, require a VCPR to prescribe a veterinary prescription product. Nearly all feed grade antimicrobials are available OTC, yet a few feed grade antimicrobials, known as Veterinary Feed Directives are regulated by the Food and Drug Administration (FDA) and specifically require a VCPR as defined by the FDA.

The FDA has outlined in draft guidance #209, recommendations to increase requirements for veterinary oversight of antimicrobial use in animals as a component of implementing a policy on the judicious use of medically important antimicrobials also used in human medicine. Many other groups also suggest that increased veterinary oversight of antimicrobials would be beneficial to both human and animal health. Some suggest a prescription only status be implemented for all veterinary antimicrobials to provide a comparable level of control over antimicrobials in veterinary medicine as exists in human medicine. Current regulatory and statutory authority and logistical challenges, such as veterinary workforce shortage, and lack of framework, impedes immediate implementation of such a policy.

Given the current system and availability of OTC veterinary antimicrobials, the onus lies with the client or producer to seek veterinary consultation prior to use of antimicrobials to ensure that the drugs are used appropriately and judiciously in the interest of both animal and human health. While it is clear that the expertise of a veterinarian is invaluable in determining the necessity and appropriate use of antimicrobials, the availability of OTC products precludes the veterinarian from responsibility for ensuring that clients and producers comply with label instructions for OTC products.

#### **RESOLUTION:**

The United States Animal Health Association (USAHA) strongly urges the United States Department of Health and Human Services, Food and Drug Administration (FDA) to develop and support educational efforts directed toward clients and producers to seek veterinary consultation prior to the use of antimicrobials to ensure judicious and appropriate use. Furthermore, the USAHA recommends that the FDA exercise its enforcement authority to discourage illegal uses of over the counter antimicrobials that are likely to occur without veterinary consultation.