



Future use – what are the rules?

VCNZ'S Seton Butler discusses authorising farmers to hold RVMs on farm.

The ACVM Notice: Requirements for Authorising Veterinarians has a clause specifically for future use: *Clause 1.5: Issuing a veterinary authorisation to purchase and hold RVMs.*

*If the veterinary authorisation is to provide for a **specified person to hold specific RVMs** in anticipation of use, the authorising veterinarian must ensure the content of the veterinary authorisation is adjusted to what is appropriate in the circumstances.*

Further guidance from the ACVM Notice:

➔ Authorisation regarding herd health or disease control programmes

*There are circumstances in which the veterinarian is involved in on-farm herd health or reproduction or disease control programmes in which a particular RVM must be administered as soon as specified signs are noticed, but the situation or circumstances justifying the use of that RVM could change over the short to medium term. It is reasonable to authorise a person to hold specific RVMs to be used as instructed if there are **regular and appropriately frequent checks by the authorising veterinarian to confirm that the circumstances have not changed and the choice of RVM and treatment regime is still appropriate. The quantity of RVM and duration the RVM can be held must be limited and appropriate,** taking into consideration the potential for the circumstances to change.*

Some of the key terms in the ACVN Notice requirement are:

... a specified person to hold specific RVMs...

This is important because it ensures that a particular person (or persons) is identified as responsible and has the competence to, in effect, diagnose the condition to be treated, choose the appropriate RVM and administer it safely and correctly. They are also responsible for addressing adverse events that might arise from the use of the RVM, eg, contacting the veterinarian if the animal fails to respond to treatment or if there is an emergency.

... regular and appropriately frequent checks by the authorising veterinarian.

Veterinarians must use their judgement to determine, based on each farm's circumstances, the appropriate frequency of checks.

Factors to consider may include their confidence in the competence of the specified person, the relative frequency of cases being treated, the number of adverse events (including a failure to respond to treatment) and storage and management of RVMs.

The quantity of RVM and duration the RVM can be held must be limited and appropriate...

The veterinarian, again using their judgement in considering the potential for the circumstances to change, must apply appropriate limits to the quantity of the RVMs and the length of time a farmer can hold an RVM. In my view this restriction of access to RVMs as a necessary trigger for reassessment. It could be achieved through repeated authorisations of small quantities.

I believe there are risks related to the capabilities of the people making the diagnoses and administering the RVMs, leading to a failure to respond and a need for retreatment. It is also possible that some animals are over-treated due to misdiagnoses and AMR cases are missed due to repeat retreatments.

For some context here, the VCNZ Code of Professional Conduct for Veterinarians' reference to Periods of Supply (POS) states:

1. *Decide, when authorising RVMs and PMs [prescription medicines], **the most appropriate** period of supply for each product authorised after considering the maximum periods of supply. The following maximum periods of supply apply for authorisations:*

1. 3 months for PMs.
2. 6 months for RVMs for companion animals (not horses).
3. 4 months for critically important antibiotics.
4. 12 months for all other RVMs for production animals and horses.

*Within the above limits, the **actual period of supply** chosen will depend on the **particular RVM/PM, the condition being treated, and the risks that need to be managed.***

In other words, veterinarians should apply appropriate POS, not default to the maximum.

To summarise: a veterinarian is responsible for ensuring that an animal under the care of their proxy – the farmer – is receiving the appropriate treatment. Through this process the veterinarian needs to create opportunities to assess and reflect on the health and welfare status of the animal – a responsibility they accepted when they had a consultation with the farmer.

In essence, *the future use* rule is not a licence to put RVMs on farm, it's more a framework for veterinarians employing competent farm staff to assist in disease management on farm while still maintaining control and oversight.

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