

Agvet Chemicals Branch  
Agvet Chemicals, Fisheries and Forestry Division  
Department of Agriculture and Water Resources  
Via Email: [agvetpolicy@agriculture.gov.au](mailto:agvetpolicy@agriculture.gov.au)

21 December 2018

Dear Sir/Madam

**The national harmonisation of minimum veterinary prescribing and compounding regulatory requirements for veterinary practitioners – treatment of livestock**

WoolProducers Australia welcomes the opportunity to make a submission to the Harmonised Agvet Chemical Control of Use Task Group (HACCUT) updated proposal regarding the minimum regulatory requirements for veterinary prescription and compounding for livestock treatment. We thank the Department for providing an extension on the due date for our submission to 21 December.

WoolProducers is the peak industry council representing Australian woolgrowers. We advocate the interests of the wool industry on federal and international issues. Our policies and advocacy are developed by our Board and our Animal Health and Welfare Committee, which is comprised of woolgrowers and industry representatives from state farming groups and other wool associations.

WoolProducers strongly advocates that HACCUT does not impose a maximum period for veterinarians to revisit a property for the supply of livestock treatments and pharmaceuticals. This is because access to veterinary treatments and pharmaceuticals is essential for woolgrowers to provide the best health and welfare standards for their sheep. However, if a maximum period is to be imposed, WoolProducers would advocate for no less than a 24-month maximum period.

A scenario that exemplifies a case in which three months is too short is the supply of acepromazine for the sedation of rams at shearing. Many woolgrowers and shearers are reliant on access to the drug for ram sedation for Occupational Health and Safety (OH&S) reasons, and for a very long time the drug has been supplied to woolgrowers on the basis of strong client-veterinarian relationships. Human safety must not be compromised in any future determinations on this issue.

WoolProducers advocates that pain relief must be used for surgical mulesing and is gravely concerned that the increased use of non-steroidal anti-inflammatories (NSAIDs) and analgesias for husbandry procedures may slow, if not decline, should access to drugs such as Meloxicam® be made more difficult by mandated repeat veterinary visits. Given the positive welfare outcomes for animals administered NSAIDs and/or analgesia, access to these pharmaceuticals should not be affected by increased regulatory burden if mandatory maximum periods are imposed.

Ultimately, the responsibility and decision to supply pharmaceuticals and treatments lies with the veterinarian. Given their training and legislated responsibilities, veterinarians should be trusted to exercise professional judgement when supplying treatments and other pharmaceuticals. If three month maximum periods are mandated for resupply visits, it is likely that it will be impractical and unworkable for some veterinarians, particularly those in remote areas, to conduct the visits. This could lead to perverse outcomes for animals under their care if they are denied treatment due to impracticalities or costs associated with visits. It may also lead to veterinarians and clients operating in breach of the ruling.

WoolProducers strongly supports the recommendation that remote consultation via photographs and videos be allowed for the purpose of diagnosis and establishing a therapeutic need. This will enable woolgrowers greater access to veterinary care in circumstances where time required for a veterinarian to visit would compromise the health and / or welfare of an animal or flock.

Thank you for the opportunity to provide this submission. Should you require further information or wish to discuss WoolProducers' submission further, please contact Ashley Cooper, Policy Manager, on 0455 442 776 or via email ([acooper@woolproducers.com.au](mailto:acooper@woolproducers.com.au)).

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Jo Hall', is positioned above the typed name.

Jo Hall  
CEO