



The Australian Veterinary Association Limited

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3 July 2015

Director, Chemical Review
Australian Pesticides and Veterinary Medicines Authority
PO Box 6182
Kingston ACT 2604

Dear Sir/Madam

Re: Stakeholder input into chemical review priorities

Thank you for the opportunity to comment on the APVMA's chemical review priorities.

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 8500 members come from all fields within the veterinary profession, including clinical veterinarians who work with companion animals, livestock, exotic animals and wildlife, as well as government veterinarians, academics, and those in pharmaceutical and other commercial enterprises.

We have consulted with our membership on the list of chemicals flagged for review, and offer the following information which may be of assistance to you. Note that the information is given under specific animal headings to describe the current use and importance of certain chemicals for particular industry sectors.

Chickens

Levamisole is an important registered anthelmintic in chickens (the only registered anthelmintics in chickens are levamisole and piperazine). Note we typically only worm long lived birds – layers, broiler breeders and slow growing meat birds which are usually layer cockerels for the Vietnamese market.

Permethrin is also very important as we are quite limited in insecticides (mites). Malathion is registered for use on chickens for this purpose but is less efficacious and difficult to apply due to OH&S issues as well as the logistics of treating free range birds.

Mebendazole is used off label for chickens to try and achieve tapeworm efficacy. Registration of this product for in-lay birds would be desirable.

Toltrazuril is very important in poultry (and pigs) as the treatment of choice for coccidiosis outbreaks (pullets) and as a strategic preventative in pigs.

Chlortetracycline is absolutely critical for laying birds. At the moment this is the only affordable antibiotic registered for use in laying chooks. LincoSpectin is also registered but generally not used due to price.

The disinfectants and sanitisers: formalin and potassium permanganate; formaldehyde; and glutaraldehyde plus quaternary ammonium compounds, are listed as important for egg fumigation and shed disinfection.

Sheep

Toltazuril is used as an off-label prescription in sheep. This provides a preferable treatment to sulphonamides, especially in episodes of severe disease with substantial challenge. The continued availability of this treatment is important.

Triclorfon has been used in livestock & horses for over 50 years. It has been useful in fly baits around animal housing & shearing sheds.

A general comment that some label changes may be required to encourage best practice in use of disinfectants on-farm in the beef & sheep industries.

Alpacas

Toltrazuril is very important as an effective treatment for coccidiosis in alpacas.

Selenium is essential for treatment of domestic livestock (alpacas included) as Australian soils are deficient in selenium. Inability to access this product would have a huge impact on the health and fertility of domestic livestock.

Levamisole is important in many combination drenches for alpacas (and sheep).

Goats

Levamisole should only be used in goats under veterinary prescription. It is an important tool assisting goat farmers to deal with drench resistance. It is essential that a full arsenal of worm drench families, including levamisole, is available.

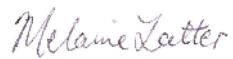
Permethrin is needed as an off label prescription to control ticks and lice in goats.

Benzathine penicillin is an essential tool for treating clostridial infections and pneumonias in goats and other livestock. Procaine penicillin has been known to cause anaphalaxis in Saanen goats so access to benzathine penicillin is crucial.

Selenium - goat kids frequently suffer from selenium deficiency (sudden death, white muscle disease). Access to veterinary medicines containing selenium such as vaccines and rumen boluses is essential for continued kid health and welfare.

The AVA would appreciate being kept up to date and have further opportunity for comment as the review process takes place.

Yours sincerely

A handwritten signature in dark ink that reads "Melanie Latter". The script is cursive and fluid.

Dr Melanie Latter
Veterinary Affairs Manager
Australian Veterinary Association