

February 1, 2016

Manisha Mehrotra
Director
Human Safety Division
Health Canada

Marc Legrand
Senior Policy Analyst
Policy, Regulatory and International Affairs Division
Health Canada

Re: Veterinary Drugs

The Canadian Honey Council appreciates the opportunity to provide input on the uniqueness of the industry as it relates to the distribution of veterinary drugs and welcomes further discussion as it relates to policy development. It goes without saying that the present model of distribution has worked fine for the industry and our first preference would be to maintain the status quo. We recognize, however, that consumer and social pressures may prevent that from occurring.

There are over 7000 beekeepers in Canada and their hives are located in densely populated urban settings and remote rural locations. Currently beekeepers are able to use only two veterinary drugs, tylosin and oxytetracycline hydrochloride, with the prospect of approval of lincomycin in the near future. Both approved drugs are used to treat American foulbrood (AFB), a highly infectious and contagious disease. Once established, AFB can spread rapidly and can ultimately result in dead colonies and equipment having to be destroyed, disinfected or irradiated. Because of potential residue levels in honey, it is recommended that tylosin only be applied in the fall. In the case of both oxytet and tylosin, it is usually added to sugar/syrup and fed to bees.

For commercial operations, the drugs are commonly used prophylactically. In part this is due to the rapid speed in which AFB can proliferate. Also, it is economically advantageous to apply rather than have to deal with an AFB outbreak. Because of the natural movement of bees, not only for pollination, but also because of the location of neighboring bee yards, it is prudent to protect stock. For smaller operations, the drugs may be used only when AFB is present.

Currently, distribution regulations differ from province to province. Veterinary oversight would seem to be extremely difficult given that most vets have little or no expertise in bees. That being said, the Canadian Honey Council recognizes that if a degree of regulatory control is deemed necessary, then it must be flexible enough to ensure access as well as limit negative economic impacts. Therefore, we would propose the following method for regulatory oversight:

If veterinarians feel comfortable enough and have the necessary expertise in entomology to provide prescriptions they should be able to do so. In all likelihood, this would provide limited access since so few vets would be qualified and most would likely not carry the necessary products or know where to get them from. In order to address the aspect of availability, we would suggest that Health Canada design a one day certification course in which Provincial Apiculturalists, bee tech team members and registered beekeepers could enroll and be certified to issue "prescriptions". Examples on how this could be achieved are Commissioner of Oaths and Notary Publics. Those persons who

successfully completed the certification course would have "official status" and may have certain obligations for record keeping.

Another model that has been contemplated uses Alberta as an example. Currently, the provincial apiculturist has the authority to sign off on the need for the medication for each particular beekeeper. This model however, may be more difficult in regions where there are a large number of beekeepers (Ontario/B.C.) and is dependent on whether or not the provincial apiculturist has the resources to administer this process. It is important to keep these antibiotics accessible so that one beekeeper is not posing a risk to another beekeeper in the nearby vicinity.

Finally, the Canadian Honey Council would also recommend to have licensed distributors (such as Medivet pharmaceuticals and Alberta and Manitoba Honey Producers Co-operative and other major bee supply businesses) for the drugs to ensure accessibility.

It is our belief that this will fit the unique requirements of the beekeeping sector.

As Health Canada further develops its plan for veterinary drugs, the Canadian Honey Council would like to offer its assistance and insight. Please do not hesitate to contact us.

Respectfully,

A handwritten signature in blue ink, appearing to read "Kevin Nixon".

Kevin Nixon
Chair
Canadian Honey Council