



14 December 2018

Harmonised Agvet Chemical Control of Use Task Group (HACCUT)  
By email: [agvetpolicy@agriculture.gov.au](mailto:agvetpolicy@agriculture.gov.au)

Dear Sir/Madam

**RE: The national harmonisation of minimum veterinary prescribing and compounding regulatory requirements for veterinary practitioners – Treatment of Livestock**

Cattle Council is the peak industry body for Australian grass-fed cattle producers. Its primary task is to create and support policies that benefit the national herd and its owners.

On Cattle Council's behalf, I wish to address one concerning issue included in the Harmonised Agvet Chemical Control of Use Task Group (HACCUT) discussion paper with the above title.

Under definition #20 (p. 5), the meaning of "Under the care of a practitioner" is provided. This issue is covered under your questions 8, 9 and 10 (p. 20), which relate to the preceding commentary.

The following is noted:

*In developing the definition, the working group recognised that the most difficult issue in the definition is the time between visiting a property and examining the animal(s) to make an initial diagnosis and treatment, and revisiting that property to assess progress in relation to ongoing treatment. The maximum time of 3 months has been proposed between visits, to ensure that veterinary chemicals supplied for a specific treatment are being used appropriately (p. 20).*

Cattle Council believes that mandating three-monthly visits by vets when administering "potentially hazardous" drugs is impractical in many cases.

While it is important to prevent indiscriminate use of veterinary drugs, and particularly those potentially harmful to the administering person (from, say, needle-stick) or the population more generally (from, say, antimicrobial resistance), recognition must be given to vets' capacity to use their client knowledge and relationships when judging whether to provide drugs remotely.

Forcing veterinary visits to remote properties on a three-monthly basis for monitoring the treatment of entrenched conditions would most likely have unintended negative consequences. These would include illegal prescribing of necessary drugs for repeat treatments or a lack of treatment for financial reasons, leaving animals to suffer.

It is in the vet's interests to ensure initial diagnoses are accurate. This should involve a property visit but, if distances are vast, should allow for vets to rely

---



on case history, client relationships and remote monitoring using electronic photographs, videos and such like. At the very least, these methods of monitoring could be used once diagnosis has been established, circumventing the need for a three-monthly visit.

For the sake of good animal welfare, ongoing veterinary engagement with clients and practicality, Cattle Council requests this aspect at least be reconsidered.