



Statement on the Authorisation of Dry Cow Therapy

Purpose

The use of Dry Cow Therapy products is an area that continues to generate queries and concerns to the Veterinary Council of New Zealand (VCNZ). The purpose of this statement is to provide further detail and clarification for veterinarians on the VCNZ Code of Professional Conduct requirements when authorising, dispensing, recommending, selling and using these restricted veterinary medicines.

Requirements

Dry cow therapy (DCT) products are classified under the Agricultural Compounds and Veterinary Medicines (ACVM) Act 1997 as restricted veterinary medicines. When authorising the purchase and use of DCT products veterinarians must comply with the Ministry for Primary Industries (MPI) ACVM Performance and Technical Standard No 1 on Veterinarians recognised to issue a valid authorisation on purchase and use of Restricted Veterinary Medicines.

When authorising the purchase or use of DCT veterinarians must also comply with the relevant requirements of the Veterinary Medicines section of the VCNZ Code of Professional Conduct ('the Code'). These are set out in Appendix 1 and include meeting the requirements for veterinary consultation which is defined as follows in the Code:

A veterinary consultation must include the veterinarian:

- 1. interviewing the client (or a legitimate and authorised representative of the client);*
- 2. collecting and recording sufficient information relevant to the individual circumstances to ensure the proposed course of action (including treatment) is appropriate and meets the needs and best interests of the animal(s) and the client;*
- 3. obtaining appropriate consent to the proposed course of action;*
- 4. being given and accepting responsibility for the ongoing health and welfare of the animal(s) concerned in relation to the consultation. This includes arranging emergency care taking into consideration the circumstances and the potential for adverse effects from, or failure of, the agreed course of action;*
- 5. determining and providing the appropriate level of advice and training in order to be satisfied that the agreed course of action can occur as planned*

Consultation will usually involve the animal(s) having been seen by the veterinarian at the time of the consultation. If not, they will have been seen recently or often enough for the veterinarian to have sufficient personal knowledge of the condition/health status of the animal(s). This consultation is required in order for the veterinarian to be able to propose the particular course of action/treatment.

Where DCT is to be authorised its use must be a planned and integral part of an ongoing mastitis control programme in which the veterinarian is involved.

More than one veterinarian may be involved in a herd's mastitis control programme (eg general practitioner and consultant). Either veterinarian may be in a position to authorise DCT providing they can comply with the requirements of the Code and this statement and take account of the particular circumstances including the preference of the farmer. If more than one veterinarian is involved in managing a mastitis control

programme on a farm each should communicate with the other(s) to share appropriate information in order to optimise treatment and welfare outcomes.

The authorising veterinarian must be aware of the current health status of the animals and their dairy environment by direct physical examination at the time of authorising the product - or by a sufficient number of prior examinations in the current season.

Interpretation of the epidemiology and bacteriology of sub-clinical and clinical mastitis must be demonstrable. The authorising veterinarian must have appropriately considered clinical findings, diagnostic test results, milking management, herd factors, residues and antimicrobial resistance issues and obtained and taken into account farm records where these are available including:

- Bacteriology from clinical and sub-clinical mastitis
- Clinical mastitis-incidence at calving (defined as calving to 1 week post calving)
- Incidence during lactation to dry off; incidence during dry period
- Bulk milk somatic cell count history for the previous year and the current year
- Individual Cow Somatic Cell Counts - this year and last year's summary (as on herd test records) with particular emphasis on late season individual somatic cell count information from herd test data
- Data from in line diagnostic technologies
- Dry cow therapy records
- Culling history for mastitis over the last 3 years.

The authorising veterinarian must advise the farmer on the DCT product most suitable in the circumstances and how it should be applied in the herd, with appropriate advice on how to avoid the risk of potential inhibitory substance grades.

As a guide, an ongoing mastitis control programme should include:

- Advice on culling, with attention to meat withholding times in treated animals sent to the works.
- Guidelines for the farmer on the economics of their course of action
- Advice on
 - correct administration of dry cow therapy
 - management of drying off process
 - handling of clinical mastitis during the dry period
 - management of cows prior to calving
 - management of cows post calving.
- Advice on the selection of antibiotic for treatment of clinical mastitis
- Advice on the reason for current mastitis status eg. is the problem due to environmental mastitis, poor dry cow management, a faulty milking machine and/or milking management
- Action plans to help farmers manage their mastitis situation in the future.

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Appendix 1: Extracts from Code of Professional Conduct, Veterinary Medicines section

Veterinarians must exercise sound professional judgement when authorising, dispensing, recommending, selling and using veterinary medicines.

1. When using or selling any unrestricted veterinary medicine or dispensing a restricted veterinary medicine, veterinarians must:
 - a. Ensure effective product management (storage, reporting adverse reactions, maintaining the integrity of product, labelling, security, safety of handling); and
 - b. Practise in accordance with the Agricultural Compounds and Veterinary Medicines Act 1997, Animal Products Act 1999, Hazardous Substance and New Organisms Act 1996, Health and Safety in Employment Act 1992, Medicines Act 1981, Misuse of Drugs Act 1975 and associated subordinate legislation in relation to all these acts as well as other relevant legislation.
2. When using or recommending any unrestricted veterinary medicine or authorising any restricted veterinary medicine, veterinarians must:
 - a. Consider the implications of its use with regard to risks to public health; trade in primary produce; agricultural security; animal welfare; occupational health and safety; and the environment and act accordingly to avoid or mitigate significant risks;
 - b. Be satisfied that the choice of product is justified, and that use is appropriate to achieve the intended effect and ensure the welfare of the animal;
 - c. Provide appropriate advice on the management of residues and withholding periods in food producing animals;
 - d. Determine and provide the appropriate level of veterinary involvement (if any) required during and after administration in order to manage the risks; and
 - e. Determine and provide the appropriate level of advice and training (if any) to:
 - i. Administer the veterinary medicine safely and appropriately;
 - ii. Monitor the effects of treatment on the animals;
 - iii. Make provision for veterinary intervention in the case of adverse effects.
3. When using or authorising restricted veterinary medicines, veterinarians must comply with the requirements and expectations of MPI ACVM Group in relation to authorisation. This is set out in their published performance and technical standards:http://foodsafety.govt.nz/elibrary/industry/Veterinarians_Recognised-Sets_Expectations.pdf

Additionally veterinarians must:

 - a. Comply with all of the points in paragraph 2 above;
 - b. Obtain sufficient information to assist risk assessment and to support the choice of that veterinary medicine through either:
 - i. Veterinary consultation as defined in the glossary; or
 - ii. Issuing Veterinary Operating Instructions as detailed in paragraph 4;
 - c. Create and maintain appropriate records detailing the decision and the action taken; and
 - d. Honour requests for written authorisations in lieu of dispensing.

For further information consult the online version of the Code and explanatory notes at: http://www.vetcouncil.org.nz/CPC/VetMed/CPC_VetMedicines.php