



## SUPPLYING RESTRICTED DRUGS FOR SHEARING OF RAMS

Supplying drugs has always been problematic for veterinarians. Now there is pressure on veterinarians on two major fronts to supply prescription only products to large numbers of livestock owners. The first is sedatives for the shearing of rams and the second is the use of Trisolven<sup>®</sup> for pain relief after mulesing of lambs.

Sedation of rams for shearing has become a particularly significant issue and the Australian Workers' Union has now distributed a written policy designed to protect shearers.

### **Schedule 4 drugs (Prescription Animal Remedies)**

The main issue in relation to all these drugs is that they are Schedule 4 poisons or Prescription Animal Remedies (PARs). These products are included in this schedule because they are considered to require the training and expertise of a veterinarian to allow their safe and effective use. Poisons within Schedule 4 may only legally be supplied to veterinarians; or by a veterinarian to a client directly; or via a pharmacist on prescription. The majority of injectable Schedule 4 drugs are used by veterinarians and not supplied.

There are two main levels at which controls are exerted over Schedule 4 drugs:

1. Drugs and Poisons legislation, administered by State and Territory Health Departments; and,
2. Veterinary practice legislation administered by Veterinary Surgeons Boards (or equivalents).

Traditionally veterinarians have been reluctant to supply Schedule 4 drugs either because they thought it was illegal or because they had concerns about the adverse consequences of doing so.

### **Requirements for Supply**

In all States and Territories, a *bona fide* veterinarian/client relationship must be in place to legitimise any supply of Schedule 4 drugs.

What this means is that veterinarians *are* able to supply Schedule 4 drugs, but only to the person who owns, or has appropriate delegated authority for the animals to be treated, such as a manager, trainer, kennel owner, etc. They cannot supply the shearing contractor because the contractor is not actually responsible for the animals which they are treating and therefore vets have no client relationship that connects them to the animals being treated.

Drugs and Poisons or Therapeutic Goods legislation administered by state health departments specifically controls scheduled poisons and covers issues in relation to their prescription and dispensing, as well as prohibiting their supply to persons other than veterinarians, doctors, dentists or their clients as described above.

Drugs and Poisons legislation:

- requires compliance with professional standards (usually as identified by the relevant Veterinary Surgeons Board);
- usually requires supply of "appropriate" quantities;
- requires labelling of dispensed products, very relevant to this issue; and
- requires records to be kept of the supply of most Schedule 4 drugs.

(In addition, some States or Territories require records of treatment and supply under their control of use (agricultural and veterinary medicines) legislation, for residue control purposes.)

## **Labelling**

All states require that every dispensed container, being the bottle not just the box, carries a veterinarian's dispensing label. There are slight differences in each State and Territory in regard to the details required on a dispensing label. General requirements are owner name, animal species, adequate directions for use and veterinarian/practice name and address.

## **Liability**

Many of the issues around the dispensing of these Schedule 4 drugs by veterinarians are not strictly to do with compliance with legislation but more to do with liability. The veterinarian supplying the Schedule 4 drugs needs to assure themselves that the client knows how to use the product properly. In order to ensure this, and meet the requirements for confirming an appropriate veterinarian/client relationship, any veterinarian supplying these products would almost certainly have to visit the farm and provide on-the-job training to the nominated user of the drugs, at least the first time they are supplied.

Such training should cover such things as:

- appropriate handling of syringes, needles and vials;
- appropriate use rates – weight and dose calculations;
- “aseptic” technique (animal value might affect this);
- dealing with human or animal emergencies;
- loss or theft of product;
- warning that on-supply of the Schedule 4 drug by the user is illegal;
- warning against mis-use; and
- keeping of records.

To reduce problems of mis-use or on-supply it is also recommended that:

- only enough of the Schedule 4 drug is supplied for the job – it is preferable for users to have to obtain more than to have lots left over); or,
- owners are required to return unused product at the end of shearing;
- owners are required to use a treatment record sheet (such as Appendix 11 of the *AVA Guidelines for Prescribing, Authorising and Dispensing Veterinary Medicines (2005)*); and
- veterinarians supplying Schedule 4 drugs obtain the owner's signature on a comprehensive disclaimer document which spells out what they have been told about how to use the drug and in particular, the possible risks from use of the drug, including animal death.

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