



January 3, 2018

Dear Mr. Ouimette:

Equestrian Canada appreciates the opportunity to provide comments and concerns in regards to the changes to fees proposed for veterinary drugs.

Equestrian Canada, in consultation with the Equine Health and Welfare Committee has reviewed the proposed changes and is concerned with the implications that would arise from the proposed changes in fees; and the negative impact these changes may have on equine health and welfare in Canada. The higher fees would severely impact access to products in the Canadian market and result in increased costs for the few licensed veterinary products that remain available. Higher fees for veterinary drugs would negatively impact all Canadian animal agriculture and reduce the ability of veterinarians to adhere to best practices in veterinary medicine, and the ability of owners to effectively implement responsible herd health procedures through limiting the availability of licensed products.

For many years, the Canadian equine industry, due to the high regulatory costs associated with registering drugs in Canada, has faced decreased access to new equine drugs. Due to the relatively small equine market in Canada compared to the United States, veterinary pharmaceutical companies, in some instances, have elected to not register a United States licensed product in Canada.

Previously, equine owners have been able to access these products through the "own-use" importation provision. With the new restrictions on "own-use" importation, equine owners in Canada no longer have access to these products and face increased costs to access the already limited number of Canadian licensed veterinary drugs available. Lower priced drugs for all agricultural animals historically were often imported for own-use from the United States market. This avenue has closed for the equine sector for all but one product.

If the proposed services fees are implemented, the equine sector will lose products currently licensed for the Canadian market and many new products may never seek to come to market in this country. The new fees will effectively undermine all current initiatives put in place to ensure responsible and prudent use of veterinary drugs, particularly medically important antimicrobials (MIAs). Veterinarians and producers will have to manage animal health welfare in the absence of appropriate licensed products. Veterinarians will seek to use more compounded products for their clients' horses, increasing the risk to welfare, as compounding company products are not held to the same standard as Pharmaceutical Company licensed products. These products may be contaminated and/or of inconsistent content. The new fees will also undermine research and development into alternatives to antimicrobials, a pillar of the Federal Government's *'Antimicrobial Use and Resistance Framework'* document as well as the Federal Government's *Plant and Animal Health Strategy* targeting animal disease management.



Equestrian Canada is fully in support of all of the comments and feedback CAHI has provided in regards to this issue. We also feel very strongly about the need to align the veterinary drug approval system with that of the United States. Recognizing and accepting the reviews of the veterinary drug regulatory work of the USA Food and Drug Administration as CAHI suggests would help eliminate the duplication of services and help to keep fees more appropriate for certain segments of the Canadian market.

The equine industry in Canada is multi-faceted and is a significant contributor to the Canadian economy, contributing more than \$19.6 billion annually (Evans, 2010, [https://www.equestrian.ca/cdn/storage/resources\\_v2/75KBT6pHH85NmER7q/original/75KBT6pHH85NmER7q.pdf](https://www.equestrian.ca/cdn/storage/resources_v2/75KBT6pHH85NmER7q/original/75KBT6pHH85NmER7q.pdf)). Additionally, it should be noted that equines are now shown to provide emotional stability, mental and physical health benefits to their owners and those associated with them. An increasing number of equines are used for the purpose of therapy animals in Canada. The effects of decreased equine health and welfare would directly impact the health and economic sustainability of a large number of humans.

Thank you for your consideration of our feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Eastwood". The signature is fluid and cursive, with a large loop at the end.

Jennifer Eastwood

Director, Technical Development  
Directrice, Programmes techniques  
Equestrian Canada Équestre