RESOLUTION 8 — 2013
Regular Annual Session

Submitted by
AVMA Executive Board

Policy on Veterinarian Notification of Violative Residues in Foods of Animal Origin

RESOLVED, that the American Veterinary Medical Association (AVMA) adopt the policy on Veterinarian Notification of Violative Residues in Foods of Animal Origin as noted below.

Veterinarian Notification of Violative Residues in Foods of Animal Origin
The AVMA supports a safe, abundant, and wholesome food supply raised in an environment that enhances public health and animal well-being. The AVMA recognizes that the use of FDA approved pharmaceuticals in food animals is necessary to treat, prevent and control disease, to improve animal well-being and to present healthy and safe animals for market. The AVMA supports the tolerances for residues for all FDA-CVM approved food animal pharmaceuticals.

Preventing violative drug residues is a basic tenet of responsible animal care and of safe food production. Veterinarians have an essential role in preventing such violations and ensuring the appropriate and judicious use of pharmaceuticals on food animal operations. Therefore, the AVMA advocates for:

1. Judicious use of all pharmaceuticals in food animals occurring under guidance within a valid VCPR.
2. Veterinary oversight of drug use on farms to ensure compliance, judicious use, and residue prevention programs are followed. This veterinary oversight should occur for all drugs used on the farm regardless of the distribution channel or prescription status of the drug.
3. As new animal drugs are established, the AVMA encourages FDA to establish tolerances for such drugs and encourages USDA-FSIS to institute testing programs for the detection of violative drug residues of these new compounds to protect public health.
4. A process whereby the veterinarian of record or prescribing veterinarian for a farm is notified when a violative drug residue in meat, milk, egg or other food product of animal origin is detected. Steps below should be triggered by a first violative residue for a producer and any subsequent violations:
   a. Require producer of the violative product to provide the name(s) of the veterinarian(s) to appropriate regulatory agencies, so that FDA will notify that veterinarian(s) of the violation.
   b. Require producers who have violative residues to complete a workable written residue prevention plan with the veterinarian identified. The producer is recognized as the principal party satisfying the plan as a condition of compliance.
   c. Public notification should be limited to repeat violators.

Public notification of first time violators who do not complete steps a+b above within 30 days of first violative notice should be made through the USDA-FSIS Residue Violation Information System.

Statement about the Resolution

This new policy is deemed necessary in order to advocate for veterinarian notification when a client’s food products derived from animals have been found to contain violative drug residues. Further, veterinarians need to maintain adequate oversight of drugs used at farms where a Veterinarian-Client-Patient Relationship (VCPR) is in effect, and to work closely with animal producers to prevent violative drug residues.

Currently, a veterinarian working within a VCPR may never be aware that a producer he or she is prescribing or dispensing medication to uses the medication in a way that results in a violative drug residue. Under the United States Department of Agriculture Food Safety Inspection Service’s (USDA FSIS) Residue Detection Program, when a violative residue is detected, USDA FSIS informs the federally inspected slaughter or processing establishment via certified letter, and, USDA FSIS says that “under best practices, the establishment should notify the producer that an animal from that business has a violative chemical level.” The USDA FSIS also shares its violative residue findings with the Food and Drug
Administration (FDA), which has jurisdiction at the level of the farm. According to FDA, illegal tissue residues are a common reason FDA writes a warning letter to farmers or food animal producers. However, based on recent findings by the Council on Biologic and Therapeutic Agents (COBTA)/Clinical Practitioners Advisory Committee (CPAC), currently it appears that less than 10% of violative tissue (meat) residues result in a warning letter. Within the current rules, if an animal producer has no more than one residue violation within a 12-month time period, the veterinarian may never be aware of the inappropriate use of the medication they are prescribing or dispensing, because there is no direct veterinarian notification of the violation by the US Government and there is no publically available list of producers with less than two violations in a 12 month period of time.

FDA representatives have personally communicated with members of COBTA/CPAC that a major cause of violative residues in food from animal products is the lack of a VCPR. COBTA contends veterinarians need to be made aware of all violative drug residues related to products they have prescribed or dispensed, but veterinarians might not be informed of the violations by the producer with the violation. FDA representatives have also stated that they recognize the problem of veterinarians not being aware of these violations and not being notified. The spirit of the policy is to support veterinarians intervening with the producer after the first violation so the problem can be corrected and further residue risk minimized.

The FDA has moved towards more veterinary oversight of all drugs used in food animals. Veterinarians readily accept this responsibility, however the spirit of COBTA’s recommendation contends that if veterinarians are going to assume oversight and work towards preventing residues, they need to be aware of all violative residues on a client’s farm. The purpose of this policy is for the AVMA to advocate for such veterinarian notification so that veterinarians can become more involved in client’s farms for which they have a VCPR to ensure appropriate and judicious use of medications in food animals and to help prevent further residue violations from occurring.

Financial Impact: None

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