SASKATCHEWAN
VETERINARY MEDICAL
ASSOCIATION

OPERATIONAL POLICIES
FOR
PRESCRIBING, DISPENSING, COMPOUNDING AND SELLING PHARMACEUTICALS
IN SASKATCHEWAN

November 2019

CONTENTS

INTRODUCTION

Veterinarians are dedicated to the health and welfare of all animals through diagnosis, treatment and prevention of disease. We also play a principal role in ensuring a safe food supply for Canadians by promoting the responsible use of pharmaceuticals, biologicals and agricultural chemicals by animal owners and animal caretakers.

This document is intended to assist with the appropriate delivery of veterinary services and safe, responsible drug use by veterinarians and their clients, and to address public concerns regarding food safety and use of pharmaceuticals in animal production.

In addition, adherence to these guidelines will help maintain the highest quality and purity standards in Canada's agri-food industry, and safeguard export markets.

Federal Food and Drug Regulations amendments announced in 2016 and policy changes relating to veterinary oversight of antimicrobials have been considered in the drafting of these protocols.

The professional responsibilities of veterinarians engaged in prescribing, dispensing, selling, and compounding of antimicrobials, including those administered through feed and water, are explained in this document.

The professional obligations of licensed veterinarians engaged in the prescribing, dispensing, compounding and selling of pharmaceuticals described in this guideline are consistent with the Canadian Veterinary Medical Association Veterinary Pharmaceutical Stewardship Advisory Group (CVMA – VPSAG) and the Canadian Council of Veterinary Registrars (CCVR) collaboration on the document: *Veterinary Oversight of Antimicrobial Use: A Framework of Professional Standards for Veterinarians.*

Much of this document has been reproduced or edited with the generous consent of the Alberta Veterinary Medical Association.

PART A - SVMA COUNCIL GUIDELINES FOR VETERINARIANS PRESCRIBING DRUGS

APPLICATION

The guidelines set out in this part with respect to required professional responsibilities of veterinarians related to prescribing apply to the following categories of drugs and substances:

- All drugs or substances listed in the *Prescription Drug List*

  https://www.canada.ca/en/health-canada/services/drugs-health-products/drug-products/prescription-drug-list/list.html?_ga=2.222898523.1761176343.1499787844-1690454391.1405713705

- Any antimicrobials not listed in the *Prescription Drug List* administered by any route of administration including in feed and water, regardless of their designation by Health Canada; *
- Any drug or medication used in an extra-label manner;
- Any drug which has been removed from its original packaging;
- Any drug or substance listed in the Schedules to the Controlled Drugs and Substances Act.

These professional responsibilities apply to prescribing of antimicrobials administered by all routes including feed and water.

The issuing of prescriptions for administration of antimicrobials via feed must be in accordance with the Compendium of Medicating Ingredient Brochures (MIB).

Notwithstanding the above, members are reminded of the substances prohibited for sale for administration to food-producing animals in Canada (Banned Substances). Currently these include:

- Chloramphenicol or its salts or derivatives;
- 5-nitrofuran compound;
- Clenbuterol or its salts or derivatives;
- 5-nitroimidazole compound;
- Diethylstilbestrol or other stilbene compounds.

* *This will be outdated in Dec 2018*

PROFESSIONAL OBLIGATIONS - PRESCRIBING

The prescribing veterinarian must be licensed with the SVMA and be working out of or in conjunction with a SVMA certified and inspected veterinary practice where medical records are maintained.

Requirements to be met by the licensed veterinarian in order to appropriately prescribe a drug include:

1. Establish and meet conditions of a valid Veterinary Client Patient Relationship (VCPR) regarding a specific animal or group of animals
2. Make an evidence-based determination of medical need
3. Complete appropriate documentation in the medical record
4. Provide oversight of use and follow up

Establish a Valid VCPR

Veterinarians are required to establish a valid VCPR prior to the provision of veterinary medical services including ordering treatment by virtue of issuing a prescription.

The term "Veterinary-Client-Patient Relationship" is defined in s. 31.11 of the *SVMA Bylaws.*

For the purpose of this document the following definition is accepted as an interpretation of the SVMA bylaw.

Veterinary-Client-Patient Relationship (VCPR) - A VCPR exists when all of the following conditions have been met:

> *(i) The veterinarian has assumed responsibility for making clinical assessments and recommendations regarding the health of the animal(s) and need for medical treatment,*
>
> *(ii) The veterinarian has sufficient knowledge of the animal(s) on which to base the assessment, diagnosis and treatment of the medical condition of the animal(s). This means that the veterinarian:*
>
> - *is professionally acquainted with the keeping and care of the animal(s), and*
> - *has documented relevant and timely interaction between the veterinarian, animal owner or caretaker and animal patients, and*
> - *has documented medically appropriate information and knowledge about the animal(s)*
>
> *(iii) The client has agreed to follow the veterinarian's recommendations and prescription.*
> *(iv) The veterinarian is available or has arranged for follow-up evaluation, especially in the event of adverse reactions or failure of the treatment regimen.*

The medical record must clearly demonstrate the establishment of a legitimate Veterinary Client Patient Relationship.

Make an Evidence-Based Determination of Medical Need

It is the responsibility of the licensed veterinarian to make an informed decision that a particular drug will be prescribed. The veterinarian must have established the medical needs of the patient, either on an individual or herd basis, prior to prescribing treatment.

It is expected that the establishment of need and the decision to prescribe a particular drug are evidence based or informed. The veterinarian must collect or receive significant and relevant information with respect to the health of the animal or animals by appropriately investigating.

The most common investigation used when prescribing drugs in veterinary medicine is taking a pertinent medical history and conducting a physical examination of an animal or group of animals.

A licensed veterinarian may use other forms of investigation and information related to the particular case at hand to make or support an evidence-based diagnosis and decision on treatment. These include a variety of laboratory test results or production data.

It is not necessary that an individual animal is examined in every instance that a veterinarian issues a prescription. Veterinarians may appropriately prescribe drugs based on examination and/or relevant knowledge gained from other sources, such as expert opinion on the diagnosis of a group of animals.

It is required in every instance when a prescription is issued that the veterinarian has relevant medical knowledge to support the establishment of medical need.

When prescribing an antimicrobial, the veterinarian should consider the contribution of all antimicrobial use to development of antimicrobial resistance (AMR). Veterinarians should also take into account the importance of the antimicrobial to human health always giving consideration to the class of drug, dose and duration when prescribing.

Prescribing veterinarians are required to follow the CVMA Prudent Use Guidelines.

ANIMAL HEALTH PROTOCOL

Veterinarians may establish animal health protocol(s) for an animal or group of animals in advance or anticipation of an animal health event (illness, vaccination, processing etc.).

The documented animal health protocol established by the veterinarian is considered to establish the medical need for issuing a prescription.

An animal health protocol is *not* a prescription and *does not authorize* the dispensing of pharmaceuticals.

An animal health protocol is a specific direction or series of steps to be undertaken following a specific scenario or indication.

When an animal health protocol includes a direction that a pharmaceutical be administered to an animal or group of animals, a legitimate prescription must be issued before pharmaceuticals are dispensed.

Complete Appropriate Documentation in the Medical Record

The investigation conducted and the information upon which the licensed veterinarian relies to determine the medical need must be documented in the medical record. The medical record must also document the elements of each specific prescription issued.

Medical records for all practice types (companion animal, large animal) shall contain sufficient information entered into the record regarding the history, consultations, laboratory investigations and physical examination findings to justify the prescription and use of the pharmaceutical. A precise diagnosis or purpose for use of the pharmaceutical must be recorded.

Specifically, medical records shall be maintained by the veterinary practice and document:

- All prescriptions generated for the specific animal or group of animals (including in feed and water prescriptions), supported with specific evidence of establishment of medical need.

- All prescriptions must be specific to drug, quantity, indication, route of administration, duration of administration, withdrawal time (if relevant) and number of refills available.

- The prescribing veterinarian must clearly document the intention to prescribe a specific product (trade name) with no substitution, or the chemical name of the drug which would allow the dispenser to dispense the product (trade name) of their choice.

- All medication dispensed or sold for the animal or group of animals and evidence that a valid prescription is on file.

- Medical records shall document the diagnosis or purpose of use, and communication regarding progress of care, patient response to treatment including treatment failures and any adverse reactions.

Records that are maintained on any farm, production or other group unit are in addition to the medical records maintained by the veterinarian; such records are not a legal medical document.

A prescription or order for treatment that is to be dispensed at a facility other than the inspected facility at which the prescribing veterinarian is employed, may be transcribed in a portable format and must include the following information:

- Prescribing veterinarian and certified veterinary facility, and contact information
- Patient owner/agent (client)
- Date of prescription
- Identification of individual animal or group of animals
- Name of drug prescribed and concentration

- Quantity of drug
- Directions for use, including dose, frequency, and duration
- Route of administration
- Substitution (yes or no) of same drug (different brand name)
- Number of refills (implies zero if not indicated)
- Withdrawal time
- Signature of the veterinarian

In addition, prescriptions for pharmaceuticals to be administered via feed must be consistent with federal legislation and minimally include the following:

- Animal production type
- Weight or age
- Type of feed
- Total amount of feed or feeding period
- Amount of drug used per tonne
- Manufacturing instructions
- Cautions

Provide Oversight of Use and Follow Up

The accepted definition of VCPR specifically dictates that the licensed veterinarian who is responsible for making medical decisions with regard to an animal or group of animals must be available for follow up or have arranged a designated alternate. This obligation extends to the prescribing of any pharmaceuticals including antimicrobials.

It is the responsibility of the prescribing veterinarian to ensure that prescribed pharmaceuticals are used properly. This includes client training and education on appropriate use, handling and storage, withdrawal time (if applicable), and being available in the event of treatment failure or adverse reactions.

Regardless of where a client gets a prescription filled, the prescribing veterinarian is responsible for oversight of appropriate use of prescribed medications.

EXTRA LABEL DRUG USE (ELDU)

In the interest of protecting animal health and welfare, the right of veterinarians to prescribe extra-label drug use (ELDU) must be maintained.

ELDU (also referred to as “off-label use”) is defined as the use in animals of:

i) A pharmaceutical product in a manner that is not in accordance with Health Canada’s

approved label, package insert, or registration by the Canadian Food Inspection Agency or Health Canada.

ii) Any approved drug that is administered in a manner not explicitly stated on the approved label in regard to indication, dosage regimen, route or frequency of administration, duration of treatment, or target species.

iii) Any drug approved for human but not veterinary use,

iv) Active pharmaceutical ingredients (API's), and compounded drugs.

Extra label drug use by veterinarians is guided by the CVMA "Extra-Label Drug Use (ELDU) – Position Statement" June 30, 2015:

> *The CVMA holds that Extra-Label Drug Use (ELDU) is an important and legal strategy in the effective and efficient treatment of animals by licensed veterinarians when an approved veterinary product is not available or suitable.*
>
> *The CVMA supports ELDU when the prescribing veterinarian has evidence to support efficacy, dosage regimen, or indication for the disease and species being treated, and the circumstances of the use are in accordance with the provincial veterinary regulatory authority's policy or guidelines.*
>
> *The CVMA holds that only veterinarians are qualified to prescribe ELDU in animals and it must only be performed within the confines of a valid veterinary-client-patient relationship.*

A prescription for a medically important antimicrobial to be administered via feed must be issued in accordance with the indications, species, dosage, treatment durations and withdrawal times specified in the Compendium of Medicating Ingredient Brochures (CMIB) and / or drug label.

A feed prescription issued for an antimicrobial or other medication or for a species, dosage, duration or withdrawal time not listed in the specified CMIB or on the label, is considered extra-label drug use. The veterinarian issuing any ELDU prescription for food producing animals is required to comply with the CVMA Antimicrobial Prudent Use Guidelines (2008) which state:

> *"If an antimicrobial is selected that is an extra-label use, the veterinarian must provide, in writing, the appropriate information on dose, route, frequency, duration and withdrawal time to avoid a risk to food safety. The Canadian Global Food Animal Residue Avoidance Database (www.cgfarad.usask.ca) should be consulted for its recommended residue avoidance information when antimicrobials are used in an extra-label manner".*

The veterinarian may also rely on other relevant information and advice.

Drugs of Very High Importance in human medicine which are listed as class I Antimicrobials by Health Canada should not be used in an extra-label manner in animals destined for the food chain. Furthermore, such antimicrobials and should only be used in an extra-label manner in other animals if all alternatives have been exhausted, there are culture and sensitivity supporting their use, and the animal is determined to

have a reasonable chance of survival. Note that mass medication of animals with a class I antimicrobial constitutes extra-label usage and should be avoided.

Veterinarians may prescribe a Health Canada approved product (veterinary or human) for a species, at a dose or for an indication not on the label, provided there is no suitable on-label product available.

When prescribing extra-label drug use, the veterinarian has the responsibility to ensure safety, efficacy and, if appropriate, food safety.

Veterinarians must obtain informed consent from the owner when prescribing extra-label drug use.

Veterinarians must adhere to Health Canada regulations and guidelines on drugs prohibited for use in food producing animals or other situations. *See page 4 list.*

PART B – SVMA COUNCIL GUIDELINES FOR VETERINARIANS DISPENSING PRESCRIPTION DRUGS

> *NOTE: Guidelines set out in this part apply to dispensing of types or categories of drugs or substances set out in Part A of this document. Members should note additional requirements for drugs covered in Part E of this Guideline regarding Prescribing Narcotic, Controlled and Targeted Substances.*

Dispensing is the act of supplying prescription medications on the specific direction in the form of a prescription from a licensed veterinarian, for a specific animal or group of animals.

Dispensing or filling a prescription is a unique activity, under provincial and territorial authority and may be performed only by a licensed veterinarian or a registered pharmacist in accordance with provincial legislation.

Dispensing is the act of supplying prescription medications on the specific order of a practitioner, who has determined the need or anticipated need of a patient (either individual animal or group of animals with a similar need) and who is responsible for treating or addressing this specific need.

A veterinarian who undertakes the dispensing of a medication pursuant to their own or another veterinarian’s prescription is considered to be a dispensing veterinarian.

Federal legislation defines a “practitioner” as a person authorized by the law of a province of Canada to treat patients with any drug listed or described in the Prescription Drug List of the Food and Drugs Act.

In Saskatchewan, medical treatment of animal patients is restricted to licensed veterinarians. There is a requirement that all veterinary practice and clinic facilities offering veterinary services in Saskatchewan be inspected and certified by the SVMA in accordance with the *Practice Standards and Bylaws.*

The acts of prescribing and dispensing are separate and distinct professional activities, and each may be appropriately performed by different veterinarians in different veterinary practices. However, in many circumstances where an animal is examined, and treatment is ordered, the prescribing veterinarian also

acts as the dispensing veterinarian and the acts of prescribing and dispensing are performed as an integrated activity.

The separation of prescribing and dispensing activities is recognized by the SVMA as acceptable practice.

TRANSPARENCY

Prescribing and dispensing are separate veterinary medical activities. The authority for a veterinarian to undertake each of these activities is established by legislation.

Recognizing a potential conflict of interest exists, the processes of prescribing and dispensing of pharmaceuticals must be transparent.

The establishment of medical need and prescribing of a particular pharmaceutical must be an evidence-based decision that is transparent to the client.

The client's choice to have a prescription filled wherever they may legally do so must be maintained and respected. Any action that would result in a client being forced to purchase pharmaceuticals from a particular location would justify claims of conflict of interest.

A licensed veterinarian who has determined the medical need and appropriately issued a prescription must provide a transcribed copy of the prescription to a client upon request. Such a transcribed prescription permits a client to access medication from a source other than the prescribing veterinarian.

PROFESSIONAL OBLIGATIONS - DISPENSING

A licensed veterinarian may dispense drugs only through a SVMA inspected and certified veterinary facility.

Notwithstanding the above, a veterinarian licensed and practising out of, or in conjunction with a SVMA certified veterinary facility located in Saskatchewan may dispense pharmaceuticals for animals located in another jurisdiction with which the SVMA has an established agreement (Appendix A) provided the following conditions are met:

a. The dispensing veterinarian is also licensed by the professional regulatory organization in the jurisdiction where the animal(s) are located,

b. The veterinary practice is certified and inspected by the SVMA and the professional regulatory organization of the jurisdiction where the animals are located or alternatively, the practice certification and inspection undertaken by both jurisdictions are jointly recognized by both regulatory organizations,

c. The veterinarian dispensing the pharmaceuticals does so in accordance with the minimum practice standards of the SVMA and the regulatory organization of the jurisdiction where the animal(s) are located,

d. The veterinary practice from which the pharmaceuticals are dispensed agrees that the practice may be audited or inspected (at the cost of the veterinary practice) by the SVMA and the regulatory organization of the jurisdiction where the animal(s) are located.

A veterinarian who elects to dispense medication (pursuant to a prescription issued by a veterinarian working in the same practice, or to fill a prescription written by another veterinarian) must meet the following requirements:

Establish the identity of the client and create a medical record

- The dispensing veterinarian must confirm the identity of the client and maintain or establish an appropriate medical record for each client and patient.

Establish the identity of prescriber

- The dispensing veterinarian must confirm the licence of a prescribing veterinarian as well as the fact that the prescribing veterinarian is practicing in conjunction with an appropriately inspected and certified veterinary facility or practice in Saskatchewan.

Determine the validity of the prescription

- The dispensing veterinarian must confirm the validity or reasonableness of a prescription; if a prescription is not valid, not reasonable, or improperly written, the dispensing veterinarian **must** reject the prescription and not dispense any medications. The situation may be rectified by calling the prescribing veterinarian for clarification and confirmation of the prescription.
- A prescription may be filled no longer than 12 months from the date when the prescription was written (after this time, a new prescription is required);
- A prescription, including refills, can facilitate treatment for no longer than 18 months from when the prescription was written.

Maintain prescriptions on file

- The dispensing veterinarian must maintain original prescriptions in the medical record. Copies (marked as such) may be provided to the client as required. These copies must be marked such that another veterinarian will not fill them.
- A specific prescription may be maintained at only ***one*** dispensing location at a time.

Manage available refills

- The dispensing veterinarian must obtain and confirm accuracy of an original prescription and refill information and must forward available or remaining totals to other dispensing locations if requested by the client.
- A declining balance of refills must be maintained, such that when the final refill is performed, a prescription is finished. No more refills may be made, and a new prescription must be generated by a prescribing veterinarian.

Appropriate delegation of dispensing

- While only a licensed veterinarian may prescribe drugs (prescribing veterinarian) under Part A, a licensed veterinarian (dispensing veterinarian) may delegate the task of dispensing to a Registered Veterinary Technologist (RVT) who is employed by the dispensing veterinarian's practice and under that veterinarian's indirect, direct or immediate supervision. The dispensing veterinarian remains ultimately responsible for the dispensing process.
- Dispensing pursuant to a prescription may be delegated to an RVT under immediate supervision or must be reviewed by the dispensing veterinarian within 24 hours.
- Dispensing refills may be delegated to an RVT under indirect supervision; such dispensing does not require review by the dispensing veterinarian.
- Certain logistical services may be delegated to other non-registered staff (i.e. picking inventory, counting pills, printing and affixing labels), but the responsibility for labeling and final check of the dispensed pharmaceuticals must be performed by an RVT or dispensing veterinarian.

Provide Information to client

- The dispensing veterinarian must provide a client with all necessary information regarding use, storage and safety of a product.

In addition:

- Any substitution by the dispensing veterinarian of a specific prescribed medication for a generic medication, compounded medication, different formulation, strength or drug from the same or not the same drug class, must be confirmed with the prescribing veterinarian prior to dispensing.

- Prescriptions taken over the phone must be immediately transcribed to a written prescription by the dispensing veterinarian or an RVT to whom the veterinarian delegates the activity. This may NOT be delegated to an unregistered individual.

- All pharmaceuticals must be stored and displayed in accordance with the *Practice Standards*. Specifically, the types or categories of drugs or substances set out in Part A of these Guidelines must be stored in such a manner as to prevent physical access to products by the public.

LABELING OF DISPENSED PHARMACEUTICALS

All products dispensed under Part B must be appropriately labeled.

In all cases, a dispensing label generated and affixed by the dispensing veterinarian is required in addition to the manufacturer's label.

Medication that is dispensed in the original manufacturer's packaging will provide the client with only part of the required labelling information.

In these cases, a dispensing veterinarian is not required to duplicate information from the manufacturers' label on the veterinary dispensing label.

Labels Applied to 'Using Unit'

Each 'using unit' of product must be labeled by the dispensing facility. A using unit is defined as the amount of the medication in the manufacturer's packaging that is expected to be used as a unit when dispensed.

For example, if units of medication are dispensed by the bottle, each bottle must have a dispensing label. If units are dispensed in a case, each case must display the dispensing label.

"For Veterinary Use Only"

The *Food and Drug Regulations* require that the words *"For Veterinary Use Only" or "Veterinary Use Only"* appear on the main panel of both inner and outer package labels of approved veterinary pharmaceuticals. These words must appear immediately following or proceeding the proprietary or brand name, proper name or common name, in type not less than one half as large as the largest type on the label. When a pharmaceutical is dispensed in a container other than its original, the dispensing veterinarian must include *"For Veterinary Use Only" or "Veterinary Use Only"* on the dispensing label.

Dispensing Label Information

A dispensing label that includes information specific to the prescription (and therefore will not appear on manufacturer's label information) must be affixed or confirmed by a registered member working at the dispensing veterinary practice. The dispensing label must include:

- Name of client or owner,
- Name of prescribing veterinarian and veterinary practice where prescribing veterinarian is employed,
- Name of dispensing veterinarian and veterinary practice where dispensing veterinarian is employed,

- Identification of specified animal or group of animals for which medication is dispensed,
- Total quantity of drug dispensed, and
- Directions for use in the animals for which drug is prescribed, including dose, frequency, and duration of treatment.

Manufacturer's Label Information

The following information will appear on the manufacturer's label.

- Name of drug dispensed and its concentration,
- Drug Identification Number (DIN),
- Minimal withdrawal time (where applicable) as prescribed, and
- Storage precautions and any toxic warnings or other precautions appearing on the manufacturers' label.

However, if medication is dispensed in packaging other than the manufacturers' original packaging then the above information must appear on the dispensing label.

DISPENSING RECORD AUDIT

All veterinary practices must create and maintain medical records of dispensing undertaken by veterinarians working in that practice.

The SVMA will undertake practice inspections and may audit pharmaceutical sales from veterinary practices.

All pharmaceuticals that are sold from an SVMA certified and inspected veterinary practice must have a recorded audit trail. The sale of any prescription pharmaceutical that is recorded by an invoice will require as part of the audit trail:

- A record of the appropriate dispensing, including the labeling of the dispensed pharmaceutical,
- A record of the prescription, either:
    - medical record documentation of the required elements of the prescription as described in Part A if prescribed by a veterinarian in the same veterinary practice from which the pharmaceutical was dispensed, or
    - the original prescription issued by another SVMA licensed veterinarian
- A medical record that documents the investigation that was undertaken by the prescribing veterinarian to determine the medical need if the prescribing veterinarian is working in the veterinary practice that dispensed the pharmaceutical.

Veterinarians dispensing drugs may have their purchase and sales records audited by the SVMA.

SHIPPING PHARMACEUTICALS

Veterinary practices may ship appropriately prescribed and dispensed pharmaceuticals.

Appropriately prescribed and dispensed pharmaceuticals may be shipped only by a veterinary practice. Drop shipping, or shipping of pharmaceuticals from the distributor or manufacturer directly to a client's place of residence or business, does not constitute appropriate dispensing.

A dispensed pharmaceutical may be shipped to the client's place of residence or business in the following manner:

All pharmaceuticals are dispensed and labeled in accordance with Part B of these guidelines before leaving the dispensing practice.

The properly dispensed and labeled pharmaceuticals assembled for shipment are packaged in a sealed box(es) or shipping container(s) intended to be opened by the client only.

All boxes are clearly identified with the client's name and destination address and the dispensing practice name and contact phone number.

Pharmaceuticals may be delivered directly to the client or client's residence or business location by dispensing practice staff.

Pharmaceuticals may be shipped by a veterinary practice through the mail or by a commercial carrier directly to the client or client's residence or business address.

In cases where a commercial carrier is unable to deliver directly to the client or client's residence or business, a 'drop location' or 'depot' may be used. This drop location or depot must be a recognized shipping location of a commercial carrier. The shipped pharmaceutical may not be opened or repackaged prior to being received by the client.

The dispensing veterinarian is ultimately responsible for maintaining the safety and integrity of pharmaceuticals through transit. This includes:

- Protection from extreme heat or freezing.
- Maintaining proper temperature of pharmaceuticals that require refrigeration - pharmaceuticals must be shipped in containers that are well insulated.
- Protection against breakage during normal handling – pharmaceuticals must be appropriately secured against breakage.
- Application of appropriate warning labels to the shipping container (Protect from Freezing, Protect from Heat, Refrigerate on Arrival, Do Not Drop, etc.)
- Shipping must comply with all applicable federal and provincial legislation.

PART C – SVMA COUNCIL GUIDELINES ON VETERINARIANS SELLING NON-PRESCRIPTION DRUGS

The guidelines set out in this Part C apply to sales of drugs other than those of categories or types set out in Part A.

They will typically apply to:

Drugs that are *not* on the Prescription Drug List and are *not* antimicrobials;
Certain pesticide products;
Certain parasiticides
Vaccines.

These drugs are referred to in this Part as "Non-Prescription Drugs".

The sale of Non-Prescription Drugs is a recognized activity of veterinary practices in Saskatchewan. Such sales may be carried out under the following conditions:

Sales of non-prescription drugs are within the scope of practice of veterinary medicine. Notwithstanding, a veterinarian may delegate sales of non-prescription drugs to a registered veterinary technologist or an appropriately trained and qualified unregistered auxiliary employed by the veterinarian.

Sale of non-prescription drugs does not require a prescription issued by a veterinarian and does not require the presence of a Veterinary Client Patient Relationship as defined in the SVMA bylaws.

Notwithstanding, the veterinarian has a responsibility to ensure clients are provided with and / or have adequate information about safe use of products, including: dosage, storage, withdrawal times, and any relevant precautions to be taken when using the product(s).

Non-prescription products may be sold as such only in the manufacturer's original container and packaging. Re-packaging of non-prescription products requires that the product is prescribed and dispensed in accordance with Parts A and B.

Veterinarians are reminded of s. 12.2 k of the SVMA Bylaws (as below), which prohibits the sale of any pharmaceutical or biological product to any other person, group, or company who intends to resell the product.

12.2 k ***Members*** shall not sell or supply a pharmaceutical or biological product to any other person, group, or company who intends to resell the product. This does not apply to the sale or supply of pharmaceutical and biological products to other licensed veterinarians.

PART D – SVMA COUNCIL GUIDELINES ON VETERINARIANS COMPOUNDING DRUGS

The SVMA recognizes that the procedure of compounding pharmaceuticals is within the scope of practice of veterinarians.

Compounding is defined in the *Canadian Veterinary Medical Association Antimicrobial Prudent Use Guidelines 2008 for Beef Cattle, Dairy Cattle, Poultry and Swine* as: "compounding is the combining or mixing together of two or more ingredients (of which at least one is a drug or pharmacologically active component) to create a final product in an appropriate form for dosing".

If a veterinarian participates in this field of practice, he or she must be knowledgeable about the activity and must do so within the standards of good practice required for this field. This scope of practice must be carried out in accordance with Health Canada, Health Products and Food Branch Inspectorate, "Policy on Manufacturing and Compounding Drug Products in Canada."
https://www.canada.ca/en/health-canada/services/drugs-health-products/compliance-enforcement/good-manufacturing-practices/guidance-documents/policy-manufacturing-compounding-drug-products.html

When no approved products (veterinary or human) exist, veterinarians may prescribe that a drug be compounded for a specific animal or group of animals. Compounding quantities of drugs for which no prescription has been received for the purpose of maintaining an inventory for subsequent sale is considered manufacturing and not in compliance with Health Canada regulations and consequently is not permitted.

Compounding does not include mixing drugs with feed in accordance with label directions for approved products.

Compounding of drugs is considered extra-label drug use.

Drugs may be compounded only by a veterinarian or pharmacist pursuant to a veterinary prescription in accordance with provincial legislation.

A veterinarian may compound under the following conditions:

> Veterinarians prescribing medications requiring compounding must adhere to the Canadian Veterinary Medical Association, *"Guidelines for the Legitimate Use of Compounded Drugs in Veterinary Practice";*
>
> http://cms.abvma.ca/uploads/CVMACompoundingGuidelines_2007.pdf
>
> Drugs may be compounded only by a veterinarian or pharmacist pursuant to a veterinary prescription in accordance with provincial legislation.

When no appropriate approved products (veterinary or human) exist, veterinarians may prescribe drugs to be compounded for use for a specific animal or group of animals provided the veterinarian has adequate medical justification for the prescription.

When dispensing any compounded drug, the veterinarian is responsible for the quality of the ingredients used, irrespective of who performed the compounding activity (veterinarian or pharmacist).

Veterinarians should ensure that any compounded products obtained from a pharmacy have been derived from approved pharmaceutical products.

The prescribing veterinarian remains responsible for outcomes including adverse reactions, which may include lack of efficacy.

A veterinarian shall not use cost as the sole reason for prescribing an API or a compounded drug.

Veterinarians must not prescribe, dispense or administer APIs in dose form unless properly licensed to do so.

Veterinarians must not prescribe, dispense or administer active pharmaceutical ingredients of medically important antimicrobials for use in food animals.

PART E – SVMA COUNCIL GUIDELINES ON VETERINARIANS PRESCRIBING NARCOTIC, CONTROLLED AND TARGETED SUBSTANCES

NOTE: The following Guidelines apply to the prescribing of narcotic, controlled and targeted substances, and are in addition to requirements of the guidelines set out in Parts A and B.

Veterinarians are unique in that they are defined in Federal legislation as practitioners who are granted the authority to prescribe and are entitled through Saskatchewan legislation (*The Veterinarians Act, 1987*) to dispense. With this privilege come significant risks with regards to the accessibility of narcotic, controlled and targeted substances. The nature of the pharmaceuticals in these categories carries the risks of diversion and addiction. These risks extend well beyond the patient being treated and can impact the patient's owner and the general public as well as the veterinary practitioner, allied professionals and staff.

Incidents of addiction, self-medication, drug diversion, theft, fraud and other illegal activities are all too common. It is the veterinary profession's responsibility to ensure that continued access to these necessary products is maintained through processes that guarantee their safe use in all situations.

The Saskatchewan Veterinary Medical Association is committed to the protection of public and member wellness.

Veterinarians in Saskatchewan are not currently permitted to authorize the purchase of marijuana or other cannabinoids for the treatment of animals.

Compliance with SVMA Practice Standards makes it mandatory for veterinary practitioners to record all purchasing, prescribing and dispensing of narcotic, controlled and other targeted medications through the use of Master and Dispensing Drug logs.

SVMA RESTRICTED MEDICATIONS

The following medications cannot be dispensed under any circumstances:

- Ketamine
- Euthanasia Solutions including T61
- Sodium Pentobarbital
- General Anesthetics (Propofol, Halothane, Isoflurane)
- Injectable alpha-2 agonists

Notwithstanding the above, it may be appropriate for a veterinarian to prescribe and dispense an injectable alpha-2 agonist with the following limitations:

- the prescription is for a specific single animal or a specific class of animals (e.g., 2- to 3-month-old calves);
- the prescription is for one specific purpose;
- the prescription is for one single-use incident OR for multiple single-use incidents as part of an acceptable protocol for routine procedures; and
- informed consent has been received from the client regarding use of a drug with the inherent dangers of injectable alpha-2 agonists.

It is considered unethical conduct to prescribe and dispense ***any* quantity outside of these limitations.**

Alpha 2 agonists administered orally require a prescription as described in Part A of these guidelines.

APPENDIX A

Memorandum of Understanding between the Saskatchewan Veterinary Medical Association (SVMA) and the Alberta Veterinary Medical Association (SVMA)

BACKGROUND:
The practice of veterinary medicine is regulated in each province under the authority of enabling legislation.

Each professional regulatory organization has the responsibility to develop and enforce bylaws or guidelines regarding the practice of veterinary medicine in each jurisdiction. The authority to regulate veterinary medicine does not extend past provincial borders.

Veterinarians that provide services to animal agriculture enterprises are often registered to practice veterinary medicine in more than one jurisdiction. Commonly these are neighbouring jurisdictions separated by a provincial border.

Veterinarians that practice out of or in conjunction with a veterinary practice located geographically near provincial borders provide veterinary medical services to clients in more than one jurisdiction on a daily basis.

Modern animal agriculture enterprises rely on herd veterinarians to provide production medicine services on operations that span provincial borders.

Veterinarians are under increased scrutiny to provide oversight of the appropriate use of pharmaceuticals, particularly antimicrobials.

PURPOSE:
This MOU is intended to facilitate cooperation, coordination and information sharing between the participants, namely the Saskatchewan Veterinary Medical Association (SVMA) and the Alberta Veterinary Medical Association (ABVMA) where the participants may engage in potentially overlapping enforcement activities under their respective legislative mandates, based on each participant's distinct provincial enforcement powers and processes.

AGREEMENT:
This agreement recognizes the authority and accountability established by provincial legislation relating to the regulation of veterinary medicine by the Alberta Veterinary Medical Association in Alberta and the Saskatchewan Veterinary Medical Association in Saskatchewan.
This agreement will in no way hinder the authority of the professional regulatory organization in regulating the practice of veterinary medicine within their respective jurisdictions.

The ABVMA and SVMA agree that:

1) Dispensing of pharmaceuticals by a registered veterinarian must only be performed out of or associated with a certified and inspected veterinary practice entity and for animals located within the jurisdiction where the veterinarian is registered, and the veterinary practice is located.
2) Notwithstanding (1) above, a veterinarian registered and practicing out of, or in conjunction with a veterinary practice entity located in one jurisdiction may dispense pharmaceuticals for animals located in another jurisdiction provided the following conditions are met:

a. The dispensing veterinarian is also registered by the professional regulatory organization in the jurisdiction where the animals are located,

b. The veterinary practice entity is certified and inspected by the professional regulatory organizations of both jurisdictions or alternatively, the practice certification and inspection undertaken by the regulatory organization in which the practice is located is recognized by the other regulatory organization,

c. The veterinarian dispensing the pharmaceuticals does so in accordance with the minimum practice standards of the regulatory organization of both jurisdictions (medical records, labelling, shipping etc.),

d. The veterinary practice entity from which the pharmaceuticals are dispensed agrees that the practice may be audited or inspected (at the cost of the veterinary practice entity) by the professional regulatory organization of both jurisdictions, and

e. The veterinarian may only dispense pharmaceuticals pursuant to a prescription issued by a veterinarian working out of, or in conjunction with the same veterinary practice entity.

ABVMA Representative	SVMA Representative
May 8, 2017	March 30, 2017
DATE	DATE

REFERENCES

1) Veterinary Oversight of Antimicrobial Use: A Pan Canadian Framework of Professional Standards for Veterinarians *https://www.canadianveterinarians.net/documents/pan-canadian-framework*

2) CVMA Antimicrobial Prudent Use Guidelines 2008 for beef cattle, dairy cattle, poultry and swine *https://www.canadianveterinarians.net/documents/cvma-antimicrobial-prudent-use-guidelines-2008-for-beef-dairy-poultry-swine*

3) CVMA Guidelines for the legitimate Use of Compounded Drugs in Veterinary Practice 2006 *https://www.canadianveterinarians.net/documents/cvma-guidelines-for-legitimate-use-of-compounded-drugs-in-veterinary-practice-2006*

4) Compendium of Medicating Ingredient Brochures *http://www.inspection.gc.ca/animals/feeds/medicating-ingredients/mib/eng/1330705207970/1330714849837*

5) *Prescription Drug List* *https://www.canada.ca/en/health-canada/services/drugs-health-products/drug-products/prescription-drug-list/list.html?_ga=2.222898523.1761176343.1499787844-1690454391.1405713705*

6) CgFARAD *https://cgfarad.usask.ca/home.html*

7) CVMA Extra-Label Drug Use (ELDU) – Position Statement, June 30, 2015 *https://www.canadianveterinarians.net/documents/extra-label-drug-use-eldu*

Date Approved by Council:	June 14, 2018
Date Reviewed:	June 14, 2018
Previous Approval Date:	June 14, 2018
Future Revision Date:	June 2020