

Ian Scott, Secretary General of AHDA, comments, "Making AHDA members disclose this information puts an unnecessary strain on the trust and long-term relationships AHDA members have with their customers."

He continues, "AHDA and its members fully support the efforts of farmers to dispose of spent dip correctly, but it's a pity the EA has decided to use this heavy-handed method in some parts of the country to extract information without making the end users aware."

AHDA also believes there is a danger that the approach could have potential effects on the control of parasites in the UK sheep population. Ian comments, "AHDA is currently working to have the suspension of Cypermethrin dip products lifted at the earliest possible opportunity to aid the fight against sheep scab."

APPENDIX B:

Summary of Key Changes to Veterinary Medicines Regulations 2008

Proposal to provide comprehensive rights of appeal to an appointed person when applications for the authorization or approval of manufacture or retail premises are refused

Proposal to introduce compulsory variations by the secretary of state for wholesale dealers where there is a serious non-compliance issue

Proposal to allow Suitably Qualified Persons to supply veterinary medicines to retail customers from pharmacies or registered premises without dual registration

Clarification of the controls on medicated feeds and feed additives relating to supply and possession, to reflect current practice

Proposal to introduce more flexible labeling requirements for manufacturers of products marketed under the Small Animals Exemption Scheme

Introduction of above-inflation fee increases for certain applications

I look forward to hearing from you, particularly with regard to speaker topics for our 2009 Conference, comments, omissions from the proposed regulation changes for 2008, code of best practice and views on mixing of anthelmintic with nutritional supplements.

AHDA MATTERS

Animal Health Distributors Association (UK) Limited

'TIRELESSLY SERVING OUR MEMBERS TODAY AND SAFEGUARDING THEIR FUTURE TOMORROW'

Belmesthorpe Grange, Newstead Lane, Stamford, Lincs, PE9 4JJ

Telephone: 01780 767757 Fax: 01780 767221

Email: ahda.uk@ntlworld.com www.ahda.org.uk

Members only newsletter. Not for copying or reproducing without AHDA permission

April 2008

- **AHDA Membership**
- **Legislation and Current Issues**
- **Mixing of Nutritional Supplements/Supplementary feeds**
- **Forced to divulge customer records.....**
- **AHDA Code of Best Practice**
- **Bluetongue Vaccines**
- **More Re-Classification progress**
- **CPD and exam upgrades**

It has been a busy spell for AHDA on legislative matters as you will read shortly with issues being resolved and progress on more long-term objectives. It is very pleasing to report a steady increase in distributor membership following an initiative for 2008 agreed by AHDA Council. Manufacturers, via the Foundation Partner Scheme, are slow to come forward despite encouraging verbal support so the enclosed invitation card is to be given to any of your key suppliers and their support will help strengthen AHDA even further.

AHDA Membership:

A list of our new members and those manufacturers who have committed their support to AHDA as Foundation Partners to date are:

New Distributor Members

Ace Farm Supplies, Shrewsbury
Robertson Crop Services, Kildary
Collycroft, Derbyshire
Pharmall, Harrogate
Abbeydale Direct, Ashbourne
Agri Input Direct, Newton Stewart

Foundation & Associate Foundation Partners

Bradshaw Bennett
Fort Dodge Animal Health
Trilanco
Battle, Hayward & Bower
Net-tex

Subscription invoices for 2008/2009 are now in the mail, for most members we have been pleased to pass on a reduction in subscriptions as announced earlier in our conference paper.

Legislation and Current Issues

Mixing Anthelmintics: In our last AHDA Matters we reported on the planned label changes by VMD to permit mixing anthelmintics with nutritional supplements by vet or pharmacist. Following close AHDA involvement we are pleased to see the VMD are withdrawing that instruction and will now prepare a paper on this matter for wider consultation. AHDA, having examined the issues about this matter, can only foresee problems with permitting any mixing.

The lack of any scientific knowledge on how these products affect the efficacy of the anthelmintic raises several questions. We don't even know, for instance, whether some of the increase in anthelmintic resistance has come from farmer mixed dosing with the minerals locking up the active ingredient and causing dosing level inaccuracies. As such, our advice is not to mix but to dose sequentially.

Several members have their own brand generic preparations and should consider their advice very carefully. Pharmacists and vets who are still prepared to mix will have to accept full liability for any preparation they sell. Manufacturers of nutritional supplements will also need to review their advice to distributors and farmers to avoid liability. Their products are not licensed by VMD; they are regulated by the FSA (Food Standards Agency). Members' views would be appreciated back to AHDA on how common they think anthelmintic mixing actually is and this information will help the forthcoming consultation.

Enforcement Letter from EA (Environment Agency): Some members have been receiving letters from the EA asking for us to provide them with customer details of who has purchased sheep dip, all very nicely put until the second last paragraph which forces you to disclose the information with a Section 202 Notice (Water Resources Act 1991) which leaves you with no option but to comply. We have alerted the NFU and issued a press release to alert farmers that we are being forced to disclose customer details and have registered our disappointment with the way they have approached this matter. (Appendix A)

AHDA Code of Best Practice: As previously advised, AHDA members will be offered a chance to sign up to this code which we are developing with AMI. The code will go a long way to strengthening our defence of SQP's and the current distribution system of animal medicines and will not be too onerous as it will mainly formalise current best practice that should already be in place. A possibly longer term benefit for signatories should enable AMI to look favorably on reduced need for inspections which, in turn, will lead to lower costs. These documents are not easy to write or agree and the provisional timetable is to implement by Autumn 2009.

AHDA also has to decide how best to ensure the Code of Best Practice is implemented and checked – again, view back to AHDA would be helpful, as we will, in turn, have to convince VMD of our compliance.

Bluetongue Vaccine: We have had many enquiries about this. The Intervet vaccine Bovilis BTv8 has been provisionally approved and the Fort Dodge vaccine is being considered by VMD for provisional approval. Being provisional, they can only ever be classified as POM-V. AHDA will be encouraging both manufacturers to secure full approval as soon as the data is available. If the manufacturers elect to do so, this is when POM-VPS can be requested and AHDA will be doing so at every opportunity. Given the current commotion from the veterinary side about coping with distribution and new customers, the fact that AHDA members can offer unique and unparalleled access and distribution and currently deal with the majority of livestock farmers should not be overlooked. What is also less well-known is that EU legislation only permits the vaccine to be sold to farmers within protection zones – not an easy one to manage for desperate or anxious farmers just outside.....! Meanwhile Intervet have formalised their advice on Butox Swish from a trial on efficacy against *Culicoides* (bluetongue midges). Butox Swish causes a rapid kill of midges at the body area prone to midge bites. The results of this trial support a recommendation of applying Butox Swish monthly to cattle as an aid in the control of midges. In France a liquid version of Butox (Deltamethrin) is being sprayed in a monthly programme to aid prevention. We support any fresh initiative to help prevent Bluetongue devastating farmer profits (just when things are beginning to look up in all sectors) and be working with the NAAC (National Association of Agricultural Contractors) to lobby the VMD and DEFRA to look at this approach and see if something can be approved.

Re-classification: The latest re-classification from VPC omitted the enzootic sheep abortion vaccines, much to our surprise. Following consultation AHDA needs to get more than just our voice to respond to the consultation for changes and will shortly be discussing with other bodies and the manufacturers to see if they would press for a change to POM-VPS. To date the recommendations have produced 58 products for re-classification of which 37 are ectoparasiticides, 7 are anthelmintics and 14 vaccines.

Changes to the Regulations for 2009: A summary of the changes proposed for 2009 is shown later in this newsletter. If any members would like to comment or see anything changed or added, please let us know. (Appendix B)

CPD: A formula from AMTRA seems much closer now and we expect a clear explanation of how CPD will work and be managed coming from AMTRA in May. Recently a distributor was bemoaning his poor profitability but added that he had a strong asset base. Assets are not much use if we ignore any businesses most important asset, that of their staff. Staff can make or break the most excellent of initiatives and expansions one only has to look at Terminal 5 to realize this! CPD is being touted as 'new' but in reality it is a formalisation of what has been and should be on-going anyway with staff training and development. Our aim at AHDA is to ensure CPD can be managed with minimum red tape and is freely available and we will be working with AMTRA to help this objective.

AMTRA Exam upgrades: Time really is running out to get your upgrade exam and remain on the AMTRA register. The livestock industry is experiencing a rare improvement in fortunes and this will undoubtedly stimulate growth and expansion plans as well as put money into animal health sales. If you have not registered to take the upgrade you should do so now with the utmost urgency so as not to miss and evident opportunity to add to your animal health sales.

APPENDIX A: Press Release

26th March 2008

AHDA Members Forced Disclosure

The Animal Health Distributors Association (AHDA) has labeled as "heavy-handed" the Environment Agency's (EA) approach of forcing some animal medicine merchants to disclose which of their agricultural customers purchase sheep dip products.

AHDA represents a significant proportion of UK animal health merchants, many of whom sell sheep dip products to the farming community. As such, the organisation's members are anxious to ensure sheep farmers are made fully aware that the EA can legally enforce merchants to divulge which customers are buying these products.

The EA is able to legally impose disclosure under a Section 202 notice (Water Resources Act 1991), which allows them to target farms using sheep dip and enforce water regulations and registration costs to ensure the safe disposal of spent dip.

A member of AHDA who recently refused to disclose such customer information was promptly made the subject of an enforcement order brought against them by the EA.