

Opening Statement JCAM 5TH October 2022

The ILMA welcomes the EU Regulation 2019/6 for veterinary medicinal products and has no issue with the stated objectives aimed at reducing the administrative burden, enhance the internal market and increase the availability of veterinary medicinal products, while guaranteeing the highest level of public and animal health and environmental protection.

Furthermore, the HPRA task force report into anti parasitic resistance has highlighted the need to address effectively anti parasitic resistance measures for cattle, sheep and horses using a multi stakeholder approach. ILMA also welcomed the support for the Responsible Persons we employ at all licensed merchants outlets from the CVO. In his letter to EU June 2020, he not only affirmed that the existing route of supply and distribution were not associated with increased resistance and environmental damage but also that the RP's undertake a professional internationally recognised qualification and training regime.

This committee is acutely aware of the consequences of failing to include the Responsible Persons in the prescribing of anti - parasitic medicines and has worked tirelessly with ministers and stakeholders to find a solution. The stark reality of these warnings was underlined by ICOS last week with the collapse and loss of over 90% of intermammary sales to the private vet practises and virtually no vet prescriptions given to farmers to use at co-op stores, effectively creating a monopoly in this market. This windfall of new business will multiply at least 10 - fold if anti parasitics are allowed to go down the same vet only prescribing channel. Recognition of anti - competitiveness and accessibility was also noted in the CVO's letter to EU, he stated that if sales of these products were undertaken largely by veterinarians that 'the current competitive environment for these products would be significantly weakened'

ILMA as stakeholders have agreed that anti parasitic medicines prescriptions will be entered onto the NVPS system once technology is available and working and that Licensed Merchants and RPs will invest time and money into systems compatible with the programme. To this end, NVPS prescribing terminals should be installed at all Licensed Merchants premises and the required technology training will be undertaken. Continuous Professional Development programmes will also be introduced to ensure the best and most up to date advice is given to farmers on ant parasitic resistance methods.

Close examination of the RP professional qualification introduced from 2012 emphatically proves that the RP was meeting all the EU required criteria to avail of the derogation Article 105(4) at time of entry into force. The qualification consists of an intensive 100 hour course with 4 hour practical and written exam and is accredited to an internationally recognised standard and approved by the DAFM. As part of the course a comprehensive prescribing protocol was introduced to help guard against the rising number of reports and trials showing anthelmintic resistance in cattle and sheep and environmental issues that needed urgently addressing. DAFM moved swiftly by including in the qualification many prescribing responsibilities on the dispenser, including record keeping and all other relevant information to the sale and use of the appropriate product. To this end it is clear that DAFM accepts that RP's are professionals.

In summary the DAFM must retain a level playing field in the prescribing and dispensing of anti- parasitic medicines and ensure that they adhere to the express wishes of the Irish MEP's in Europe, the recommendations of the HPRA report and the advice of the CVO coupled to the unified support of all

stakeholders. Compliance with the Directive to enhance the internal market and increase the availability of veterinary medicinal products will thus met in full. The RP must remain able to advise and deliver a consistent message on anti - parasitic resistance measures, help preserve the life of the existing groups of available wormers and introduce responsible use measures across entrenched farming practises. A holistic multi - pronged approach is nothing short of imperative if Ireland is to effectively address anti parasitic resistance. **A fresh solution has been offered to DAFM, which stakeholders believe has no legal impediment to its implementation and that this is the only route of travel to resolve this outstanding issue.**