



THE COLLEGE OF  
VETERINARIANS  
OF ONTARIO

## **REPORT ON CONSULTATION**

<b>Topic:</b>	Extra-Label Drug Use
<b>Consultation Period:</b>	March 27, 2018 – May 28, 2018
<b>Submissions:</b>	10 submissions

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### **What is the Issue**

Over the past three years, draft standards outlining the practice expectations of a veterinarian related to prescribing and dispensing drugs, inclusive of antimicrobials, have been debated and considered by a Prescribing and Dispensing Working Group. The establishment of this working group was directed by Council to make recommended practice expectations to the profession, informed by broad species sector input, on these important, high-risk activities, which include extra-label drug use. Throughout this process these drafts have been informed by new federal rules strengthening veterinary oversight of antimicrobial use, and multiple discussions with varied stakeholders on the realities of day-to-day veterinary practice. The standards have undergone a targeted stakeholder consultation as well as two public consultations over the past several years to ensure that they represent accurate, comprehensive, and reasonable practice expectations for veterinary obligations related to drugs across species.

### **Why is it Important**

The aim of the series of standards related to veterinary pharmaceuticals is to demonstrate the importance of the role of the veterinarian in both the prescribing and the dispensing of drugs for extra-label use, by recognizing and mitigating the inherent risks posed by drugs to animal and public health.

### **Overview of the Proposal**

For an overview of the proposed changes that the College consulted on, please visit:  
<https://cvo.org/For-the-Public/Public-Consultations/Veterinary-Obligations-Related-to-Drugs.aspx>.

### **Consultation Process**

At its March 2018 meeting, Council was pleased to approve a series of draft Professional Practice

Standards, including a draft standard related to Extra-Label Drug Use, which set out current and proposed practice expectations for veterinarians across all species. The draft Professional Practice Standards were circulated for public consultation for a 60-day period during which members of the College and members of the public were asked to provide their feedback.

## **What we Heard and How We Responded**

### **(a) Informed Client Consent**

There were a number of questions related to the obtaining of informed client consent for Extra-Label Drug Use. Some respondents, including the Ontario Veterinary Medical Association (OVMA), questioned whether requiring consent upon every use would be overly onerous.

Informed client consent is the legal and ethical foundation on which professionals deliver services. The proposed standard aligns with the veterinary profession's responsibility to obtain this consent.

For the above reasons, no changes were made with respect to the requirement to obtain informed client consent.

### **Sample Comments**

The following quotes, summarized from comments received, reflect issues raised during the consultation:

- *EL Drugs are often less expensive and often the only option. When the risk is small, as in small animal medicine. Vets should be able to use an EL drug without having to get informed consent.*
- *The risks associated with ELDU in companion animal medicine are far lower than in food animal production. So it is not right to paint the entire profession with one brush.*
- *There are a number of medications that are frequently and safely prescribed extra-label in companion animal medicine, based on current research and evidence for a specific species. Requiring veterinarians to inform the client that the drug is being used extra-label and to obtain informed consent every time such a drug is used is overly onerous, given the potential risk involved. It is therefore recommended that the expectation be amended to read, "Obtains informed consent from the client when prescribing a drug in an extra-label manner that, in light of current research and evidence, poses a significant or unknown threat to the species for which the medication is being prescribed."*

### **Council June 2018 Decision**

Council reviewed the consultation feedback and the draft *Professional Practice Standard: Extra-Label Drug Use* at its June 2018 meeting and approved the draft Professional Practice Standard for adoption, to be accompanied with a guide.