

Availability of Veterinary Medicines

Using the Cascade and Essential List for Equidae

Prof. Alistair Barr
University of Bristol
UK

Availability of Veterinary Medicines

Practicing veterinary surgeons would like to have available to them the widest possible range of substances for use in the investigation and treatment of animals presented to them.

Availability of Veterinary Medicines

Policy (and legislation) in this area seeks to **balance** that desire for availability against needs for...

1. Safety
2. Quality
3. Efficacy
4. Protection of the investment of the developer of a medicine and the holder of the marketing authorisation

Availability of Veterinary Medicines

“**Safety**” relates to that of.....

1. The animal
2. The operator
3. The consumer
4. The environment

Availability of Veterinary Medicines

The mechanisms to achieve this are....

1. Requirement for **marketing authorisation** and processes that surround that (including MRLs)
2. Rules to specify the use of authorised **VMPs where available**
3. The ability to resort to the **cascade** under specified circumstances

Availability of Veterinary Medicines – marketing authorisation requirement

1. Requirement for marketing authorisation and processes that surround that...

Directive **2001/82/EC**
as amended by
Directive **2004/28/EC**.

Articles 5 and 6.

Availability of Veterinary Medicines – marketing authorisation requirement

1. Requirement for marketing authorisation and processes that surround that...

Directive 2001/82/EC as amended by Directive 2004/28/EC.

Article 5 (1)

No veterinary medicinal product may be **placed on the market** of a Member State unless a marketing authorisation has been granted issued by the competent authorities of that Member State in accordance with this Directive

Availability of Veterinary Medicines

1. Requirement for marketing authorisation and processes that surround that...

Directive 2001/82/EC as amended by Directive 2004/28/EC.

Article 6 (1)

A veterinary medicinal product may **not** be the subject of a marketing authorisation for the purpose of administering it to one or more **food-producing species unless** the pharmacologically active substances which it contains appear in **Annexes I, II or III to Regulation (EEC) No 2377/90.**

ie have established MRLs

Availability of Veterinary Medicines

1. Requirement for marketing authorisation and processes that surround that...

Directive 2001/82/EC as amended by Directive 2004/28/EC.

Article 6 (3)

By way of derogation from paragraph 1, a veterinary medicinal product containing pharmacologically active substances **not** included in Annexes I, II or III to Regulation (EEC) No 2377/90 may be **authorised** for **particular animals of the equidae family** that have been declared, in accordance with Commission Decisions 93/623/EEC and ...2000/68/ECas **not being intended for slaughter for human consumption.**

Such veterinary medicinal products shall neither include active substances that appear in **Annex IV** to Regulation (EEC) No 2377/90 nor be intended for use in the treatment of conditions, **as detailed in the authorised Summary of Product Characteristics**, for which a veterinary medicinal product **is authorised** for animals of the equidae family.

Availability of Veterinary Medicines - baseline use of authorised VMPs

2. Rules to specify the use of authorised VMPs where available

Directive 2001/82/EC as amended by Directive 2004/28/EC.

Article 9

No veterinary medicinal product may be **administered** to animals unless the marketing authorisation has been issued,.....

(Exemptions under the cascade in Articles 10 and 11)

Availability of Veterinary Medicines - the cascade

3. The ability to resort to the cascade under specified circumstances

Directive 2001/82/EC
as amended by
Directive 2004/28/EC.

Article 10 – cascade for non-food animals
Article 11 – cascade for food animals

Availability of Veterinary Medicines - the cascade

3. The ability to resort to the cascade under specified circumstances

Directive 2001/82/EC as amended by Directive 2004/28/EC.

Article 10 (1) – cascade for non-food animals

Member States shall take the necessary measures to ensure that, if there is **no authorised medicinal product in a Member State for a condition** affecting a **non food-producing species**, by way of exception, the veterinarian responsible may, under his/her direct personal responsibility and in particular to avoid causing unacceptable suffering treat the animals concerned with:

- (a) a veterinary medicinal product authorisedfor use in **another animal species**, or for **another condition** in the same species; or
- (b) if there is no product as referred to in point (a), either:
 - (i) a medicinal product authorised for **human use** in the Member State concernedor
 - (ii) in accordance with specific national measures, a veterinary medicinal product **authorised in another Member State**or
- (c) if there is no product as referred to in subparagraph (b) and within the limits of the law of the Member State concerned, of a veterinary medicinal product **prepared extemporaneously** by a person authorised to do so

Availability of Veterinary Medicines - the cascade

3. The ability to resort to the cascade under specified circumstances

Directive 2001/82/EC as amended by Directive 2004/28/EC.
Article 10 (2) – cascade for non-food horses

By way of **derogation from Article 11**, the provisions of paragraph 1 of this Article shall also apply to the treatment by a veterinarian of an animal belonging to the **equidae family provided** that it has been declared, in accordance with Commission Decisions 93/623/EEC and 2000/68/EC, as **not being intended for slaughter for human consumption**.

Availability of Veterinary Medicines - the cascade

3. The ability to resort to the cascade under specified circumstances

Directive 2001/82/EC as amended by Directive 2004/28/EC.
Article 10 (3) – essential substances list for **FOOD** horses

By way of derogation from Article 11,the Commission shall establish a **list of substances essential for the treatment of equidae**

....and for which the withdrawal period shall be not less than **six months** according to the control mechanisms laid down in Decisions 93/623/EEC and 2000/68/EC.

Availability of Veterinary Medicines - the cascade

3. The ability to resort to the cascade under specified circumstances

Directive 2001/82/EC as amended by Directive 2004/28/EC.
Article 11 (1) – cascade for food animals

Member States shall take the necessary measures to ensure that, if there is no authorised veterinary medicinal product in a Member State for a condition affecting a **food-producing species**, by way of exception, the veterinarian responsible may, under his direct personal responsibility and in particular to avoid causing unacceptable suffering, treat the animals concerned on a particular holding with:

- (a) a veterinary medicinal product authorised in the Member State concernedfor use with **another animal species**, or for **another condition** in the same species; or
- (b) if there is no product as referred to in point (a), either:
 - (i) a medicinal product for **human use** authorised in the Member State concerned in accordance with Directive 2001/83/EC ...or
 - (ii) a veterinary medicinal product **authorised in another Member State** in accordance with this Directive for use in the same species or in another food-producing species for the condition in question or for another condition; or
- (c) if there is no product as referred to in subparagraph (b), and within the limits of the law of the Member State concerned, a veterinary medicinal product **prepared extemporaneously** by a person authorised to do so..... **BUT...**

Availability of Veterinary Medicines - the cascade

3. The ability to resort to the cascade under specified circumstances

Directive 2001/82/EC as amended by Directive 2004/28/EC.
Article 11 (2) – cascade for food animals

Paragraph 1 shall apply **provided that** pharmacologically active substances included in the medicinal product **are listed in Annex I, II or III to Regulation (EEC) No 2377/90**, and that the veterinarian responsible specifies an appropriate withdrawal period.

Availability of Veterinary Medicines - the cascade

3. The ability to resort to the cascade under specified circumstances

Directive 2001/82/EC as amended by Directive 2004/28/EC.
Article 11 (4) – cascade for food animals

When a veterinarian has recourse to the provisions of paragraphs 1 and 2 of this Article 10, **he shall keep adequate records** of the date of examination of the animals, details of the owner, the number of animals treated, the diagnosis, the medicinal products prescribed, the doses administered, the duration of treatment and the withdrawal periods recommended, and shall make these records available for inspection by the competent authorities for a period of at least **five years**.

Availability of Veterinary Medicines - the cascade

3. The ability to resort to the cascade under specified circumstances

Directive 2001/82/EC
as amended by
Directive 2004/28/EC.
Article 10 (3) – essential substances
list for **FOOD** horses

The "list of substances essential for the treatment of equidae" is now contained in.....
Commission Regulation (EC) No. 1950/2006

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3. The ability to resort to the cascade under specified circumstances

Commission Regulation (EC) No. 1950/2006
Article 2

Essential substances may be used,

- for the specific disease conditions, treatment needs or zotechnical purposes specified in the Annex,
- where no medicinal product authorised for equidae or referred to in Article 11 of Directive 2001/82/EC would yield equally satisfactory results in terms of
 - successfully treating the animal,
 - avoiding unnecessary suffering for the animal, or
 - ensuring the safety of those treating the animal.

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3. The ability to resort to the cascade under specified circumstances

Commission Regulation (EC) No. 1950/2006
Article 3

1. Essential substances may be used only in accordance with Article 10(1) of Directive 2001/82/EC (*general cascade provisions*)
2. The details of a treatment with essential substances must be recorded in accordance with the instructions laid down in Section IX of the identification document for equidae set out in Decisions 93/623/EC and 2000/68/EC.

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3. The ability to resort to the cascade under specified circumstances

Commission Regulation (EC) No. 1950/2006
Article 5

1. The **European Medicines Agency** shall, at the request of the Commission, ensure that the **Committee for Medicinal Products for Veterinary Use** carries out a scientific evaluation of any draft amendment to the list set out in the Annex. Within 210 days of receiving such a request, the European Medicines Agency shall deliver an opinion to the Commission on the scientific suitability of the amendment. Where appropriate, the **European Food Safety Authority** shall also be consulted.
2. When Member States or **veterinary professional associations** ask the Commission to amend the list set out in the Annex they shall duly substantiate their request and include any relevant scientific data available.

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3. The ability to resort to the cascade under specified circumstances

Commission Regulation (EC) No. 1950/2006
Annex

Anaesthetics, analgesics and substances used in association with anaesthesia - Sedation and premedication (and antagonism)

Acepromazine
Atipamezole
Diazepam
Midazolam
Naloxone
Propofol
Sarmazenil
Tiletamine
Zolazepam

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Commission Regulation (EC) No. 1950/2006
Annex

Hypotension or respiratory stimulation during anaesthesia

Dobutamine
Dopamine
Ephedrine
Glycopyrrolate
Noradrenaline (norepinephrine)

Analgesia

Buprenorphine
Fentanyl
Morphine
Pethidine

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3. The ability to resort to the cascade under specified circumstances

Commission Regulation (EC) No. 1950/2006
Annex

Muscle relaxants and associated substances

Atracurium
Edrophonium
Guaifenesin

Inhalation anaesthetics

Sevoflurane

Local anaesthetics

Bupivacaine
Oxybuprocaine
Prilocaine

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3. The ability to resort to the cascade under specified circumstances

Commission Regulation (EC) No. 1950/2006

Annex

Cardiovascular medicines

Digoxin
Quinidine sulphate and quinidine gluconate
Procainamide
Propranolol

Convulsions

Phenytoin
Primidone

Gastrointestinal agents

Bethanechol
Dioctyl sodium sulfosuccinate
Metoclopramide
Propantheline bromide

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Commission Regulation (EC) No. 1950/2006

Annex

Rhabdomyolysis

Dantrolene sodium

Antimicrobial - *Klebsiella* ssp. infections

Ticarillin

- *Rhodococcus equi* infections

Azithromycin

Rifampicin

- Septic arthritis

Amikacin

Respiratory medicines

Ambroxol
Ipratropium bromide
Oxymetazolin

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Commission Regulation (EC) No. 1950/2006

Annex

Antiprotozoal agents

Isometamidium
Pyrimethamine

Ophthalmic medicines

- Ocular ulcers

Acyclovir
Idoxuridine

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Commission Regulation (EC) No. 1950/2006

Annex

Glaucoma

Phenylephrine
Tropicamide
Dorzolamide
Latanoprost
Timolol maleate
Cyclosporin A
Ketorolac
Ofloxacin
Fluorescein
Rose Bengal
Hydroxypropyl methylcellulose

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Commission Regulation (EC) No. 1950/2006

Annex

Hyperlipaemia

Insulin

Fungal infections

Griseofulvin
Ketoconazole
Miconazole
Nystatin

Miscellaneous

Chondroitin sulphate
Domperidone
Hydroxyethylstarch
Imipramine
Thyrotropin releasing hormone
Barium sulphate
Iohexol
Iopamidol

Availability of Veterinary Medicines - the cascade

The cascade and (in the context of food horses) the essential substances list are vital enabling mechanisms for veterinary surgeons to allow them to investigate and treat animals where there are the inevitable gaps in the list of authorised VMPs

The constraints imposed are a balance and whether that balance is correct depends very much on where you are looking from

Hopefully the perspectives of the vet and the animal will always coincide.

Veterinary surgeons also need to be cognisant of their responsibilities to consumers of food, the environment and the pharmaceutical industry's need for return on investment.

The current balance is workable but not perfect – it will hopefully continue to progress!