



It would be easy to make similar regulations under this Act to those in the US, namely that all antimicrobials of human importance may only be used on a large scale in livestock production under a VFD. The same products can still be made available to subsistence farmers in rural areas as OTC stock remedies to ensure animal health in these areas.

Should the exemption that presently applies to certain antimicrobials and other veterinary products, and which classifies them as stock remedies, be removed, these products will automatically be classified as medicines under the Medicines and Related Substances Act. This will have huge implications and be counterproductive for South Africa's agricultural industry.

The Department of Agriculture, Land Reform and Rural Development (DALRRD) controls agriculture, food products, animals and veterinarians. The DALRRD has technical staff in the field countrywide who can be used to facilitate the transition of OTC veterinary products to VFD stock remedies. The Department of Health has no technical staff on the ground who have been trained in animal health, no experience in treating food-producing animals and, with the South African Health Products Regulatory Authority being a new entity with an enormous backlog, it is likely to take years before the national veterinary profession's and the general public's concern about antimicrobial use in food-producing animals are properly addressed.

With the international recognition of the rapidly spreading antimicrobial resistance problem, we do not have the time to wait for

this, but should rather follow international norms and standards as soon as possible and as already outlined in the SAAMRNSF.

#### **LARGE- AND SMALL-SCALE FARMERS**

In the new regulations of Act No. 36, it is important that the DALRRD specifies which antimicrobials should be used in animals for human food production. On all commercial farms, antimicrobials applied in feed or water should be used only under veterinary supervision based on clinical findings and/or laboratory tests. It is too dangerous for the general population, and against the One Health concept, if antimicrobials used in commercial food production can be bought OTC. However, the new regulations will have to cater for the subsistence and small-scale rural farmer, who should be able to obtain treatment for an individual animal in a co-op or from a state veterinary office, where staff should be trained to recommend the correct medication.

Veterinarians, through the Ruminant Veterinary Association of South Africa and the South African Veterinary Association, should ensure that we are recognised as the authorities on animal health. We must lead the way to the prudent use of antimicrobials in food-producing animals to ensure the efficacy of available products in both animal and human health. South African veterinarians should address the public concerns about the safety of locally produced animal products, and ensure we are representing the public's interest in this regard. – Lloyd Phillips ■ FW

