



VETERINARY SURGEONS BOARD OF SOUTH AUSTRALIA

Code of Practice

Veterinarians providing S4 drugs for mulesing of sheep/lambs

Background

In 2007 the Australian Pesticides and Veterinary Medicines Authority (APVMA) issued a permit for the supply of Tri-Solfen for use as a topical anaesthetic for pain relief on sheep for the mulesing procedure. The permit (No 8660) enabled Tri-Solfen to be supplied to a mulesing contractor as an 'agent' of the animal owner.

In December 2011 Tri-Solfen was classified by the Australian Pesticides and Veterinary Medicines Authority as a Schedule 4 (Prescription only) medication.

Issues

The issue for farmers is the need to ensure adequate pain relief is correctly administered to lambs/sheep. There may be health and safety concerns if the medication is used inappropriately or incorrectly.

The issue for veterinarians is their legal responsibility in relation to the supply of controlled substances (including S4 drugs) for the purpose of mulesing. In particular, only veterinarians can supply S4 drugs for these purposes, and as such, veterinarians are responsible for the 'trail' of the prescribed medication. They are also responsible for the outcome from the use of the medication. S4 drugs can only legally be supplied to the owner or their representative who has control of the animals. This does not extend to shearers or mulesing contractors.

Position

The Veterinary Surgeons Board supports the provision of S4 drugs – Tri-Solfen - for the purpose of mulesing for animal welfare reasons. In taking this position, the Board recognises that there are important animal welfare and public interest issues which need to be taken into account. These include

- (a) providing the wrong drug, or the wrong dose or strength of drug may have an adverse impact on the animal
- (b) the condition of the animal will have an impact on the use of drugs
- (c) intended or accidental human dosing may have severe effects
- (d) to maintain public confidence in the veterinary profession, all veterinarians must uphold professional standards consistently across the State when supplying drugs.



VETERINARY SURGEONS BOARD OF SOUTH AUSTRALIA

Code of Practice – supply and use of Tri-Solfen

The Board supports the provision of the Schedule 4 medication Tri-Solfen for use on lambs/sheep, only in accordance with all of the following:

1. The prescribed drug is provided to a 'bona-fide client' of the veterinarian. A 'bona-fide' client is one where
 - The veterinarian has a demonstrated clinical relationship with the animal/flock within the last 12 months.
 - The veterinarian can demonstrate 'on farm' visits have been regular to attend the animal/flock, at least once every 12 months. This can be a 'virtual' visit around mulesing time for properties which are at least 2 hours drive from the veterinary clinic. A 'virtual visit' may be either conducting a training session with farmers in a specific location before dispensing (eg at a farm or field day or specially arranged event), or via telephone or electronic communication with individual farmers. In all cases, the veterinarian must document the discussion with the bona fide client.
 - The bona-fide client is responsible for the animal husbandry and day to day management of the animal/flock. This is likely to be either the owner of the animal/flock, or a 'Responsible Agent' - i.e. the farm manager/stud manager.
 - The owner should have regular day to day involvement with the animal/flock and make decisions on the management of the animal/flock
 - The 'Responsible Agent' must have management responsibility for the animal/flock. A 'Responsible Agent' is not a person who provides either an irregular or regular service to the animal/flock (i.e. a shearer, mulesing contractor and so on)
2. There is a therapeutic need for the prescribed drug. To ensure there is a therapeutic need, the following procedures apply:
 - The flock is assessed individually, each year at mulesing time, to ensure the correct type, dosage and strength of drug is supplied. This can be done at the same time as the flock is inspected for shearing of rams (ie the supply of ACP).
 - Detailed instructions are provided by the veterinarian to ensure the prescribed drug is administered appropriately to the animals. These must be written instructions.
 - Veterinarians should not provide a 'blanket dose' for lambs/sheep in a flock. The veterinarian should make the owner/responsible agent aware of the need for individual doses for lambs/sheep, based on an assessment of the following
 - breed
 - assessed weight
 - environmental conditions (e.g. penned, shearing shed etc)
 - age
 - ambient temperature
 - condition of lambs/sheep (e.g. tired or exhausted from being chased etc)
 - The veterinarian is able to assess that the prescribed drug had the required outcome
 - The veterinarian is able to provide follow-up treatment or support if required
3. The Board has concerns about the use of drugs where inadvertent or unintentional human dosage can cause harm to people. Tri-Solfen is the recommended medicine to provide pain relief after the mulesing procedure, and is therefore recommended for dispensing for this activity. Other medications are inappropriate to dispense.
4. The veterinarian records the transaction of the prescribed drugs as required, and obtains the signature of the bona-fide client to whom the drugs are provided. The Board has developed 2 Forms (Pre-dispensation of drugs; mulesing of lambs/sheep) and recommends these are signed and kept as part of the veterinarian's records. The Forms are attached.
5. Unused drugs are returned to the veterinarian, together with the Form 'Post-mulesing of sheep'



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6. All other requirements under the Controlled Substances Act are adhered to in the provision of S4 drugs – in particular, the veterinarian must personally supervise the sale of the prescription drug.
7. **Uniformity across the profession is imperative.** The VSBSA requires all veterinarians to follow these principles in the provision of prescribed drugs for the purposes of mulesing lambs/sheep.

Not following these principles may result in the wrong drug being supplied, or the wrong dose or strength of drug made available. This will compromise the animal's health and welfare.

Inconsistency on this issue across the veterinary profession may also erode public confidence in the capacity of the profession to provide proper care to animals. It may also signal a lack of coherence between individual veterinarians and across the profession as a whole, which will further undermine public confidence.

The Board has based these principles on safety, consistency, and animal welfare considerations. Should the veterinarian not follow the principles endorsed by this code of practice, you may be considered negligent and so increase the potential for a civil claim being made against you and/or your practice.

8. The following **checklist** is provided to assist veterinarians, and should be read in conjunction with the above Code of Practice.

- The client is a bona fide client
- I have current knowledge of the management, health status and drug status of the animal/s
- I have established a therapeutic need for the use or supply of this drug.
- I have satisfied myself that the animal or flock is currently under my care. This may be by having been on the property in the last 12 months, or via a 'virtual visit' for properties which are at least a 2 hour drive from the veterinary clinic.
- I have followed the Controlled Substances Act 1984 in respect of storage requirements; e.g. Drugs will be stored in a locked cupboard; Cupboard will be in a cool location.
- I have followed the Controlled Substances Act 1984 in respect of the labeling requirements; e.g. 'For Animal Use only'; Directions for use on container.
- I have followed the Controlled Substances Act 1984 in respect of recording requirements.
- I have a system of follow up in place to determine whether expected outcomes of treatment are achieved.
- I am in a position to provide or arrange after care for this animal if needed, and the client is aware of my position in this respect.
- I am confident the client understands all instructions regarding the use (and, where appropriate, with-holding restrictions) of this drug.
- I am confident the client knows how to use the drug properly and safely.
- The amount I am dispensing is reasonable for treatment of the condition for which I have documented the therapeutic need, and is not excessive so as to create a possible inappropriate stockpiling of drug by the client.
- I have considered the welfare of the animal/flock in dispensing this drug.



VETERINARY SURGEONS BOARD OF SOUTH AUSTRALIA

Veterinarians may also consider providing the MS DATA Sheet on the appropriate drug to the owner/responsible agent at the time of dispensing the drug. The Sheet should be provided to a medical practitioner in the event of accidental human injection.



VETERINARY SURGEONS BOARD OF SOUTH AUSTRALIA

FORM 1 Pre-Dispensation Form - Mulesing

(To be completed by veterinarian and signed by owner/responsible agent before supplying drugs)

Number of lambs/sheep	Breed of lambs/sheep	Age of lambs/sheep	Weight Range	Body Condition	Type of Drug	Total volume supplied

Name of Owner/Responsible Agent:

Signature Date:

Name of Veterinarian:

Signature Date:

FORM 2 Post-Mulesing Record

(To be completed by owner/responsible agent and provided to veterinarian within 14 days of administering of drug with any unused drug)

Name of person giving the drug	Date and time drug given	Total Volume used (ml)	Volume remaining (ml)	Drug disposed of or wastage (ml)	Results – e.g. Good / not good / adverse reaction (describe)**

** In the event of an adverse reaction at the time of giving the drug, contact the veterinarian as soon as possible.

Name of owner/responsible agent:

Signature of owner/responsible agent:.....Date.....

Emergency contacts:

Ambulance: 000

Hospital: (insert local hospital)

Poisons Information centre: 13 1126 Veterinarian: (insert local telephone number)