

MAJLIS PENERANGAN TENTANG PRESKRIPSI UBATAN VETERINAR



TARIKH: 11 Disember 2019 (Rabu)

Masa: 2.30- 4.30 petang

Tempat: Bilik Tayangan, Perpustakaan MOA (Aras 4)

Objektif Preskripsi

- ❖ Untuk menggalakkan penggunaan drug veterinar secara bertanggungjawab dan berhemah dikalangan Doktor Veterinar (Stewardship)
- ❖ Memastikan semua drug veterinar yang digunakan didalam haiwan dan ternakan adalah berkualiti, selamat, dan berkesan

Untuk memudahkan pemantauan penggunaan drug veterinar dilapangan



Definisi Preskripsi

► Section 24 Prescription Book

(2) In this section "prescription" means any written or oral instruction to the seller or supplier to supply any poison, or medicine containing any poison, for the purpose of the medical, dental or animal treatment of any person or animal, given by any person; and "prescriber" means the person giving such instructions or causing such instructions to be given to the seller or supplier.

Definition by Merriam-Webster

A written direction for a therapeutic or corrective agent specifically :
one for the preparation and use of a medicine

Jenis Drug Veterinar yang perlu Preskripsi

- **Kumpulan B** dalam Jadual Pertama, sebagaimana ditakrifkan di bawah Akta Racun, 1952.
- **Drug Psychotropic** sebagaimana ditakrifkan di bawah Akta Racun, 1952 dan Peraturan-peraturan Racun (Bahan Psikotropik) 1989.
- **Hormone** sebagaimana yang ditakrifkan di bawah Akta Makanan Haiwan, 2009



Jenis Drug Veterinar yang perlu Preskripsi

Poison Act 1952 (NPRA is revising the usage of antimicrobial as AGP)

Section 21. Group B Poisons. First Schedule e.g Antibiotic etc,

(1) Group B Poison shall not be sold or supplied by retail to any person except:

(a) where the sale or supply of such poison, if it had been a Group A Poison, would have been authorized under section 20;

(b) by a registered medical practitioner, registered dentist Division I or veterinary officer selling or supplying the same in accordance with section 19; or

(c) by a licensed pharmacist, as a dispensed medicine on and in accordance with a prescription prescribed by a registered medical practitioner, registered dentist or veterinary officer in the form required by subsection (2) and when supplied in accordance with this Act and of any regulations made thereunder relating to such sale or supply on a prescription.



Jenis Drug Veterinar yang perlu Preskripsi

Poison (Psychotropic Substance) Regulation 1989-Third Schedule,

Regulation 11. Control on the sale and supply of psychotropic substance for medical or dental treatment of a particular patient or animal treatment of a particular animal.

(1) No psychotropic substance shall be sold or supplied for the purposes of medical or dental treatment of a particular patient or animal treatment of a particular animal except by -

- (a) a registered medical practitioner for the purposes of the medical treatment of his patient only;
- (b) a registered dentist Division I for the purposes of the dental treatment of his patient only;
- (c) a veterinary surgeon to his client for the purposes of animal treatment only;
- (d) a licensed pharmacist upon a **prescription** prescribed by a registered medical practitioner or a registered dentist Division I or a veterinary surgeon;

PART V

CONTROL OF USE OF ANTIBIOTICS, HORMONES AND OTHER CHEMICALS

Manner and levels of inclusion

19. (1) No person shall—

- (a)* incorporate any antibiotic, hormone or other chemical into feed; or
- (b)* introduce any antibiotic, hormone or other chemical directly or through a medium into animals,

unless in accordance with the prescribed manner and at the prescribed level.

(2) Any person who contravenes subsection (1) commits an offence and shall, on conviction, be liable to a fine not exceeding one hundred thousand ringgit or to imprisonment for a term not exceeding two years or to both, and for a second or subsequent offence, to a fine not exceeding two hundred thousand ringgit or to imprisonment for a term not exceeding four years or to both.

(3) Notwithstanding subsection (1), any antibiotic, hormone or other chemical may be incorporated into feed or introduced directly or through medium into animals, at a level higher than the prescribed level if prescribed as such by a veterinary surgeon in writing and only for the purpose of treatment, control or eradication of disease.

KEPERLUAN PRESKRIPSI MENGIKUT AKTA

► 1. Akta Racun 1952 (Section 24)

Section 24. Prescription book.

(1) Where any poison is sold or supplied as a dispensed medicine or as an ingredient in a dispensed medicine, the seller or supplier shall, on the day on which such poison or medicine is sold or supplied, enter or cause to be entered in a book, kept for such purpose (in this Act referred to as the "Prescription Book")-

(a) the date on which the medicine was sold or supplied and the serial number of the entry in such book of the prescription (if any);

(b) the name of the poison and the ingredients of the medicine or, in the case of a proprietary medicine, the name of the medicine and the quantity supplied;

(c) in the case of a sale or supply by a retailer on a prescription, the name of the patient, or, when the prescriber is a veterinary officer, or the prescription relates to animal treatment, the name of the recipient; and

(d) in the case of a sale or supply as a dispensed medicine otherwise than on a prescription, the name and address of the person to whom it was sold or supplied:

Provided that when a prescription is repeated it shall be sufficient to enter in the prescription book the date, the serial number of the sale, supply and prescription (if any) originally entered and the name of the patient or recipient.

(2) In this section "prescription" means any written or oral instruction to the seller or supplier to supply any poison, or medicine containing any poison, for the purpose of the medical, dental or animal treatment of any person or animal, given by any person; and "prescriber" means the person giving such instructions or causing such instructions to be given to the seller or supplier.

(3) If any prescription is given orally, such prescription shall be confirmed by a written prescription within one day.



KEPERLUAN PRESKRIPSI MENGIKUT AKTA

► 2. Akta Makanan Haiwan 2009 (Section 19)

Cara dan takat pemasukan

19.(1) Tiada seorang pun boleh—

- (a) membubuh apa-apa antibiotik, hormon atau bahan kimia lain ke dalam makanan haiwan; atau
- (b) memasukkan apa-apa antibiotik, hormon atau bahan kimia lain secara langsung atau melalui bahantara ke dalam haiwan, melainkan mengikut cara yang ditetapkan dan pada takat yang ditetapkan.

(2) Mana-mana orang yang melanggar subseksyen (1) melakukan suatu kesalahan dan boleh, apabila disabitkan, didenda tidak melebihi satu ratus ribu ringgit atau dipenjarakan selama tempoh tidak melebihi dua tahun atau kedua-duanya, dan bagi kesalahan kedua atau yang berikutnya, didenda tidak melebihi dua ratus ribu ringgit atau dipenjarakan selama tempoh tidak melebihi empat tahun atau kedua-duanya.

(3) Walau apa pun subseksyen (1), apa-apa antibiotik, hormon atau bahan kimia lain boleh dibubuh ke dalam makanan haiwan atau dimasukkan secara langsung atau melalui bahantara ke dalam haiwan, pada takat yang lebih tinggi daripada takat yang ditetapkan jika dipreskripsikan sedemikian oleh seorang doktor veterinar secara bertulis dan hanya bagi maksud rawatan, pengawalan atau pembasmian penyakit.

(4) Bagi maksud seksyen ini, seorang doktor veterinar ertinya seorang doktor veterinar sebagaimana yang ditakrifkan dalam Akta Doktor Veterinar 1974 [Akta 147].

Current Practice by Wholesaler- Written Order/ Poison Sign Order

Section 15. Sale of poisons by wholesale.

(3) The seller by wholesale of any poison shall not deliver it until-

(a) he has made or caused to be made an entry in a book to be kept for such purpose, in the prescribed form, stating the name and address of the purchaser, the date of the sale, the name and quantity of the poison sold and the purposes for which it is stated by the purchaser to be required; and

(b) the purchaser has affixed his signature to the entry or has forwarded to the seller a written order in respect of such sale signed by the purchaser and containing the particulars required to be entered under this subsection. Every such written order shall be retained by the seller and a reference to the file in which such order is retained shall be entered in the book in place of the purchaser's signature.



FORMAT PENYIMPANAN REKOD PEMBEKAL DRUG VETERINAR DAN INVENTORI DRUG

FIRST SCHEDULE

FORM A

THE POISONS ACT 1952

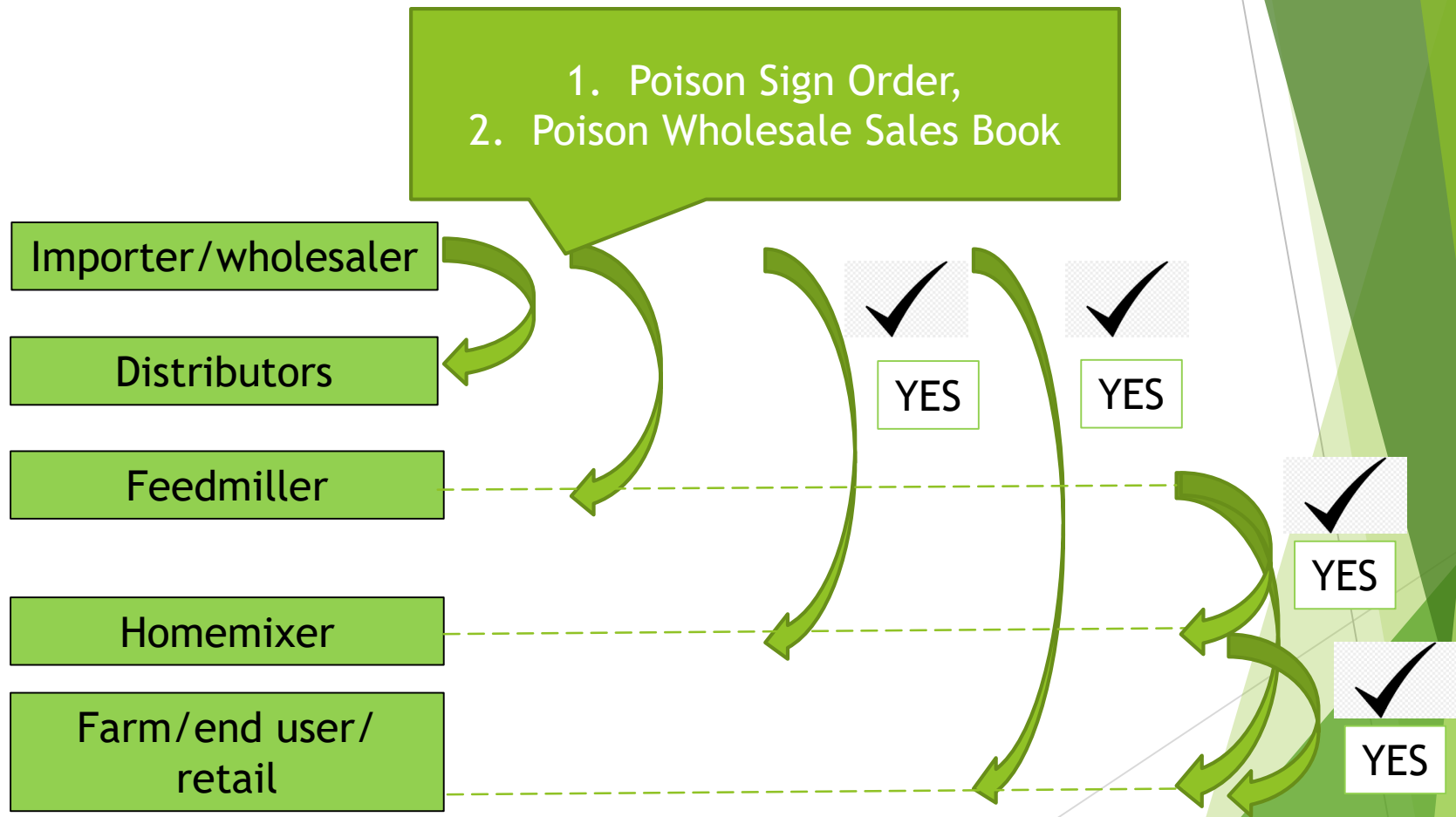
[SECTION 15(3)]

POISONS WHOLESALE SALES BOOK

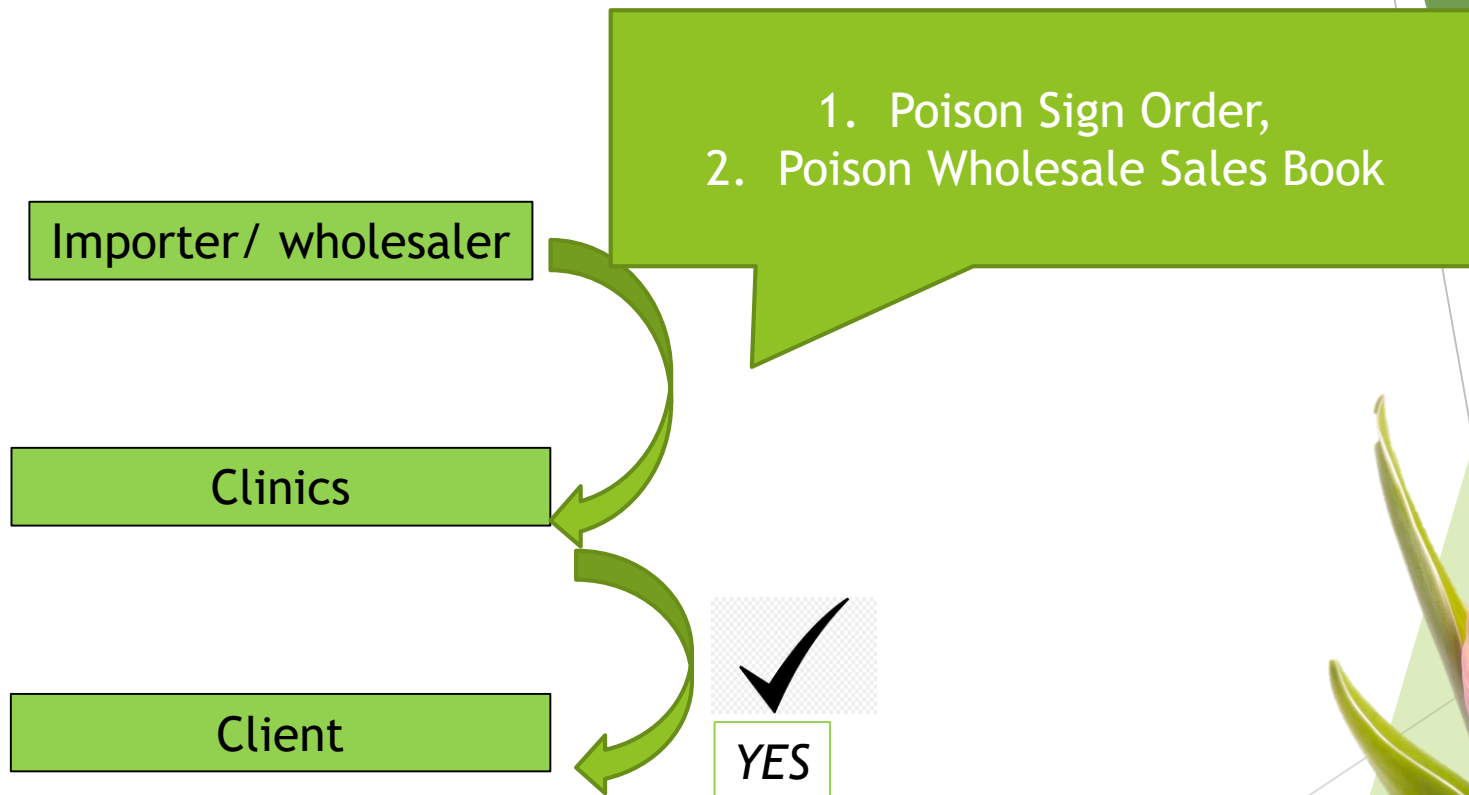
Name Of Purchaser	Address Of Purchaser	Date Of Sale	Name Of Poison Sold	Quantity Of Poison Sold	Purpose for which required	Signature of purchaser or refer to signed order



Livestock Stakeholders which need prescription book/form by vet



Companion Animal Stakeholders which need prescription book/form by Vet





Vet in clinic can supply/ dispense medication to companion animal

Section 19. Supply of poisons for the purpose of treatment by professional men.

(1) Any poison other than a Group A Poison may be sold, supplied or administered by the following persons for the following purposes-

- (a) a registered medical practitioner may sell, supply or administer such poison to his patient for the purposes of the medical treatment of such patient only;
- (b) a registered dentist Division I may sell, supply or administer such poison to his patient for the purposes of the dental treatment of such patient only; and
- (c) a veterinary officer may sell or supply such poison to his client for the purposes of animal treatment only.

CONTOH BORANG PRESKRIPSI



Missing K in Preskripsi

PRESKRIPSI/ PRESCRIPTION (HAIWAN KESAYANGAN SAHAJA/COMPANION ANIMALS ONLY)

LAMPIRAN 1

No. Siri:

Serial Number:

Nama, alamat, Nombor Telefon Klinik/ Hospital :			
Name, Address, Telephone Number Of Clinic/ Hospital			
MAKLUMAT PELANGGAN CLIENT'S INFORMATION	Nama/ Name :		
	(Orang yang akan menerima ubat/ The person to whom such medicine is to be delivered)		
	Alamat & Nombor Telefon : Address & Telephone Number		
MAKLUMAT PESAKIT PATIENT'S INFORMATION	No. Kad Pengenalan/ Passport : IC/ Passport Number		
	Nama Pesakit : Name of Patient		
	Species :		
	Jantina/ Sex : Umur/ Age :		
UBAT MEDICINE	Nama Ubat, Kekuatan, Dos & Kuantiti/ Tempoh Rawatan, Cara Penggunaan Name of Medicines, Strength, Dose & Quantity/ Treatment Period, Route of administration	Kuantiti Dibekal* Quantity Supplied*	
Catatan/ Remarks :		Tujuan Kegunaan (Rawatan/ Pencegahan/ Penggalak Tumbuhan) Purpose of Use (Treatment/ Prevention/ Animal Growth Promoter)	
(Potong mana yang tidak berkaitan/ Strike through unrelated fields)			
Nama Doktor Veterinar & Cop dengan Nombor MVC : Veterinarian's Name & Stamp with MVC Number		Tandatangan dan Tarikh: Signature and Date	

2017 format without Veterinarian

* Dilengkapkan oleh Ahli Farmasi/ Doktor Veterinar; nama, alamat, tandatangan, cop dan tarikh pendispensan.

* To be completed by Pharmacist or Veterinarian: name, address, signature, stamp and dispensing date


~In accordance to Poison Act 1952 [Act 366] Section 24 Prescription Book for Dispensed Medicine

~If any prescription is given orally, such prescription shall be confirmed by a written prescription within one day

PRESKRIPSI/ PRESCRIPTION (LADANG TERNAKAN SAHAJA/ PRODUCTION ANIMALS ONLY)

No. Siri:

Serial Number:

Nama, alamat, Nombor Telefon Ladang :			
Name, Address, Telephone Number Of Farm			
MAKLUMAT PELANGGAN CLIENT'S INFORMATIONS	Nama/ Name :		
	(Orang yang akan menerima ubat/ The person)		
	Alamat & Nombor Telefon : Address & Telephone Number		
	No. Kad Pengenalan/ Passport : IC/ Passport Number		
MAKLUMAT PESAKIT PATIENT'S INFORMATIONS	Nama Pesakit : Name of Patient		
	Species :		
	Jantina/ Sex :		
	Umur/ Age Group :		
UBAT MEDICINE	Nama Ubat, Kekuatan, Dos & Kuantiti, Tempoh Rawatan, Cara Penggunaan, Kepekatan dalam makanan atau air, Withdrawl Period Name of Medicines, Strength, Dose & Quantity, Treatment Period, Route of administration, Final concentration in feed or water, Withdrawl Period		Kuantiti Dibekal* Quantity Supplied*
Catatan/ Remarks : (Potong mana yang tidak berkaitan/ Strike through unrelated fields)		Tujuan Kegunaan (Rawatan/ Pencegahan/ Penggalak Tumbuhan) Purpose of Use (Treatment/ Prevention/ Animal Growth Promoter)	
Nama Doktor Veterinar & Cop dengan Nombor MVC : Veterinarian's Name & Stamp with MVC Number		Tandatangan dan Tarikh: Signature and Date	

* Dilengkapkan oleh Ahli Farmasi/ Doktor Veterinar; nama, alamat, tandatangan, cop dan tarikh pendispensan.

* To be completed by Pharmacist or Veterinarian: name, address, signature, stamp and dispensing date

ISSUES RAISED BY THE INDUSTRIES



Issues raised for Companion Animals Prescription

1. There is a difference between the official pharmacy prescription format issued in 2017 and the one edited by DVS. The new format suggest allows the vet to issue and sign the prescription and is not limited to the pharmacist. Has this document been approved by BPF ?
2. The alphabet "K" from preskripsi is missing . Has this document been vetted through by VAM before plan for dissemination ?
3. Lack of dialogue before launching prescription format



Issues raised for Companion Animals Prescription

4. Most companion animal vets have digital records of their patients. In the rural areas hard copy records are still practiced. This is a stark comparison in the livestock sector where prescriptions are not effectively practiced.
5. The abuse of antibiotics and the risk of drugs entering the food chain is primarily limited to the livestock industry . Why is the companion animal industry brushed with the same stroke . Our issue is much different .



Issues raised for Companion Animals Prescription

6. BPFK , previously had mentioned they were going to revise this current Pharmacy Acts limitation on the maintenance of hardcopy records in the clinic for 7 years etc , to include digital records as well. What is the status on this ?
7. BPFK , generally requires a prescription to be kept in log in the clinic . Now why do companion animal vets need to issue a copy to the client? Shouldn't we only issue one if a request for a prescription is made? Why does it have to be a default issuance of a prescription ? The drugs are already labelled on the packets with the dosing regime , patients name and owners name on the dispensing packets.

Issues raised for Companion Animals Prescription

8. Most "small" man clinics will find it challenging to manage the increased requirement to administrate this paperwork .
9. While the govt has reminded practitioners not to overcharge vet services, and the public being concerned about escalating fees.... new enforced policies such as written prescription.increase labour requirements in practice and naturally increase the cost of vet services.
- 10.Currently have Purchase Sign Order kept for wholesale sales to veterinary clinics, isn't that sufficient



Issues raised for Livestock Prescription

1. Does wholesaler selling to farm need to practice prescription also?
2. Unable to fill up certain particulars on patients information (eg. Name)
3. Does feedmiller need to practice prescription when dosing antibiotics into feed meant for livestock farms?
4. Currently no circulation of this prescription format to feedmillers, are wholesaler company obliged to inform feedmillers?



Issues raised for Livestock Prescription

5. Unable to accept the role of pharmacist in prescription.
6. Why need information like ic/passport?
7. Is prescription need between distributors
(eg. Distributor A buy registered antibiotics (in feed) from Distributor B, but Distributor A do not want to reveal the clients that is to be written in prescription form, as Distributor A & B are competitors. How to resolve this conflict?
8. Can company keep original Prescription Form, copy to End User?



Conclusion

To help get the best results from the medications taking to your animals as instructed in order to prevent from drug residue, AMR, unpleasant side effects or the medication doesn't seem to be working, and for multiple medications with different regimens and stewardship.



The 8Rs of Drugs Stewardship

- Right drug,
- Right time
- Right dose
- Right route
- Right Resident
- Right Documentation
- Right Reason
- Right Response





SEKIAN TERIMA KASIH