



May 31, 2018

Dr. Zeev Noga
Deputy Executive Director
World Veterinary Association (WVA)
Avenue de Tervueren 12
B-1040 Brussels, Belgium

Dear Dr. Noga, via e-mail: zeev_noga@worldvet.org; secretariat@worldvet.org

Re: WVA/WAVMA Policy position on Accountability for Aquatic Medicine

Thank you for giving WVA members the opportunity to provide input on the proposed WVA and WAVMA Policy position on Accountability for Aquatic Medicine. The Canadian Veterinary Medical Association (CVMA) on behalf of Canadian veterinarians involved in aquaculture and aquatic animal health and welfare would like to offer the comments below for consideration by the WVA Policy Committee.

In 2016, the CVMA adopted a position statement on Aquatic Animal Veterinary Medicine <https://www.canadianveterinarians.net/documents/aquatic-animal-veterinary-medicine-position-statement>. This position statement highlights the importance of veterinarians in aquatic animal medicine and is the basis for our feedback on the proposed policy.

While CVMA understands that some countries do not have a sufficient aquatic veterinary work force at this time, concerns were expressed regarding reduced oversight of health and welfare issues if the veterinary profession is not leading aquatic medicine. The following points were raised with respect to the proposed policy:

- This policy reduces the incentive to move from non-veterinary involvement to veterinary oversight;
- Lack of veterinary oversight cannot adequately address food safety, antimicrobial use, aquatic animal health and welfare;

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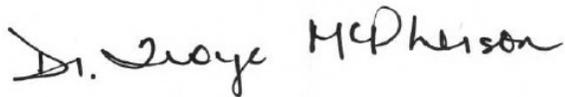
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- It would be nearly impossible to hold a non-professional, non-licensed individual accountable since there are no recognized standards to be met and there is no license to withhold or withdraw;
- Individuals may have appropriate expertise in certain areas of aquatic animal health but separating such areas as surveillance programs (for international reporting), dispensing of pharmaceuticals, and a variety of disease investigation or control practices, would lead to incongruent practices and potentially unsafe food;
- It is difficult to understand how “sufficient number of aquatic veterinarians” would be defined currently or reached over time. There is concern that reasoning invoking insufficient numbers of aquatic veterinarians could be misused in some countries where jurisdictional disputes are occurring;
- Veterinarians do not normally oversee the competence of non-veterinarians and it would be difficult to assess this competence due to the absence of professional standards.

Once again, thank you for the opportunity to provide input for consideration by the WVA Policy Committee. The CVMA would be pleased to address any questions the committee might have with regards to the above comments.

Yours sincerely,

A handwritten signature in black ink that reads "Dr. Troye McPherson". The signature is written in a cursive, flowing style.

Dr. Troye McPherson
CVMA President

SR:TMcP/ds