

21 September 2023

Therapeutic Goods Administration
PO Box 100
Woden
ACT 2606
Via online submission

To whom it may concern,

RE: Consultation: Proposed amendments to the Poisons Standard – ACCS, ACMS and joint ACCS/ACMS meetings, November 2023. Ref: 2.3 Meloxicam

WoolProducers Australia (WoolProducers) is the peak industry body representing Australian wool growers across a vast range of issues from animal health and welfare, biosecurity, natural resource management, emergency animal disease outbreak preparedness, and industry development -including research and trade.

Consumer perceptions and expectations with regards to animal welfare is a rapidly evolving topic, of which WoolProducers is actively involved. Regulatory requirements in relation to the administration of pain relief products when undertaking certain husbandry procedures are also increasing, with the usage of appropriate pain relief when undertaking mulesing now mandatory in Victoria and Tasmania.

In response to these evolving consumer expectations and regulatory requirements, there have been several innovations in the pain relief field to ensure that wool growers have access to registered, cost effective and practical pain relief products that can be administered when undertaking painful animal husbandry procedures such as mulesing, tail docking and castration. The usage of such pain relief products is now considered by many downstream consumers as “best practice”, an expectation which is reflected by the high rates of voluntary use of pain relief products at these times. There are however a number of barriers that continue to impede producer uptake.

The proposed amendment to the Schedule 6 entry for meloxicam to include certain injectable veterinary vaccines containing 1% or less of meloxicam for single use in lambs undergoing routine animal husbandry procedures is a proposal welcomed by WoolProducers. Having such a product available would address the following barriers often raised by WoolProducers members, and via industry publications, such as the Sheep Sustainability Framework On-Farm Insights Report (2021)¹, and the Trends in mulesing, tail docking and castration practices...report (2021)² by Australian Wool Innovation:

- **Impractical / stress / time pressures:** A co-formulation injectable vaccine / meloxicam product would allow for simultaneous administration of pain relief and vaccination procedures i.e. there would be no additional time, logistical or staff burden in regards to lamb marking operations. Vaccination is currently undertaken by 91% of Australian wool growers¹ and is most commonly performed at lamb marking when mulesing, castration and tail docking are also undertaken.
- **Availability:** Having a co-formulated product available as a Schedule 6 product would allow for sale and distribution via rural retailers, from which wool growers already obtain their lamb marking supplies (including vaccines).
- **Lack of knowledge:** Having such a product available as a Schedule 6 product would allow for extension and marketing via rural retailers and direct to wool growers.

¹ [ssf-on-farm-insights-report-web-25oct2022.pdf \(sheepsustainabilityframework.com.au\)](#)

² [221017-awi-project-final-report-trends-in-mulesing-final-for-publ.docx.pdf \(wool.com\)](#)

With regards to correct usage, Australian wool growers are familiar with best practice administration of subcutaneous injections, with many administering vaccinations throughout their sheep flocks, particularly at lamb marking. Further to this, many Australian wool growers are familiar with the use of products containing meloxicam by way of the injectable Schedule 4 products and the Schedule 6 transmucosal preparations.

The proposed co-formulated vaccine and meloxicam product would substantially address any concerns / risks of diversion or misuse on the basis of it being a product specifically designed for lambs at the time of marking, the additional cost relative to stand-alone vaccine and meloxicam products, and the risk of injection site reactions in non-target species caused by the vaccine antigens.

Given consumer expectations regarding the usage of pain relief, and the seemingly limited opportunities for misuse and abuse of vaccine products containing less than 1% meloxicam, WoolProducers fully supports the proposed scheduling amendment. Should such a product remain under a Schedule 4 listing there is no doubt that grower usage of such products will be inhibited due to the above listed barriers.

WoolProducers are supportive of the applicants "*reasons for the proposal*" as outlined in the "*Proposed amendments to the Poisons Standard – ACCS, ACMS and joint ACCS/ACMS meetings, November 2023*" consultation document and supports the proposal to amend the Poisons standard to include the following product under Schedule 6:

MELOXICAM in..... injectable vaccines containing bacterial antigens and 1% or less of meloxicam for single use in lambs undergoing husbandry procedures at marking.

We trust that the committee will support the proposed amendment and look forward to the finalisation of the Schedule 6 listing to deliver the potential benefits to Australian wool growers and their animals in the near future.

Please do not hesitate to contact me on 0455 442 776 should you wish to discuss any issue raised in this letter.

Yours Sincerely,



Adam Dawes
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