Donna Kusemererwa, Secretary National Drug Authority

Ticks and tick-borne disease control is not about mandate, but collaboration efforts

The *New Vision* on July 12, run an opinion on strengthening regulation of animal drugs which stated that the proposal by MAAIF to take up the oversight role for animal drugs from NDA was a step in the right direction which should even be fast-tracked considering that MAAIF had 1,350 veterinary doctors while NDA has only six.

It further implied that fake products (read animal drugs) had found their way onto the market because of the small number of veterinary doctors in NDA.

The purpose of medicines regulation (which the opinion erroneously referred to as oversight) is to ensure that all the pharmaceutical products on the market for use by both humans and animals are safe, efficacious and of good quality.

This mandate is exercised through the control of the manufacture, import, export, distribution and sale of medicines. Effective regulation of medicines, therefore, cannot be the remit of a single profession. Veterinary doctors are trained to diagnose and treat animals and have a critical role in certain elements of the regulatory cycle.

However, they have limited training in other critical steps such as pharmaceutical evaluation, certification of manufacturing plants and testing the quality of medicines in the laboratory to name a few.

The debate on whether the responsibility for regulation of veterinary medicines should lie with an agency that handles both human and veterinary medicines as is the case in Uganda, or with the Ministry of Agriculture or with a separate authority does not change the fact that a diversity of skills and competencies are required for effective regulation.

For now, CAP 206 of the laws of Uganda, the National Drug Policy and Authority Act, establishes NDA and defines its functions, which include the regulation of veterinary medicines. The authority has as of June 2017, 531 veterinary pharmaceutical products on its register. While only 21 of these are acaricides used to control ticks, they are the most important in terms of volume of imports and capital investment. Acaricides in Uganda are registered following well laidout procedures, which conform to international standards.

All acaricides for which the authority grants marketing



authorisation undergo pre-registration field trials to determine the efficacy of the products within the Ugandan context. These field trials are co-ordinated by Ministry of Agriculture, Animal Industry and Fisheries (MAAIF) and co-ordinated by the National Livestock Research Institute (NaLIRRI). Therefore, all acaricides on the market in Uganda are cleared for use by at least three government agencies.

In order to confirm that all acaricides coming to the country continually meet the defined quality standards, incoming shipments are verified at the ports of entry by qualified NDA inspectors.

Once the products are on the market, samples are picked and tested at NDA's national quality control laboratory in Mulago.

In 2017, samples have been picked from across the country from Soroti to Kisoro as well as at all ports of entry. So far all the acaricides sampled have passed the quality tests.

Therefore, whereas the unauthorised import of drugs remains a challenge and they are ultimately isolated cases of substandard products on the market, the notion that the country is awash with 'fake' drugs which are the reason that ticks are not responding is not based on fact or evidence.

Scientists from the College of Veterinary Sciences at Makerere University and other research institutes have clearly demonstrated the presence of multi-drug resistant ticks particularly in the cattle corridor districts of western Uganda, while ticks in other areas like Karamoja respond to the very same acaricides.

Ticks and tick-borne diseases are the greatest challenge facing Uganda's livestock industry and perhaps as is done for outbreaks in the human population, this could be declared an emergency so that a solution is pursued relentlessly.

As the President demonstrated recently, one of the short-term interventions is a cleansing exercise, which once complete allows for the introduction of best practices such as zoning combined with rotational use of acaricides.

As stated by the President, the other key immediate intervention is to ensure that whatever acaricides are in use, are strictly applied in the recommended way.

This calls for strong collaborative action between local governments, manufacturers' representatives, farmers groups as well as the regulators and policy makers.

Increased use of vaccination against East Cost Fever and further restricting the number of players involved in the acaricide supply chain are bound to provide additional relief for farmers and help them safeguard their animals.

The challenge of tick and tick-borne diseases will not be solved by debates over who has what mandate, but rather through a concerted, co-ordinated and collaborative approach that focuses on addressing the problem, which is the tick and the diseases it causes. Various government institutions have crucial and distinct roles to play. Farmers and the country as a whole will benefit from each of these institutions diligently doing their bit, cognisant that it is all part of a greater good.

CamScanner