Illegal Veterinary Medicines Trade and Use: Threat to Animal and Public Health in the IGAD Region

Executive Summary

Illegal veterinary medicines (expired, understrength, diluted, adulterated or fake) in the IGAD region were observed to have a negative impact on delivery of animal health, production and marketing, which in turn affects the local communities and economies, livelihoods, human and animal health, which causes poverty. The most frequently illegal (expired, understrength, diluted, adulterated or fake) veterinary medicines, as perceived by the supply chain stakeholders, were antibiotics, antihelmintics, trypanocidals, acaricides and vaccines. The estimated prevalence of illegal drugs as reported by different supply chain stakeholders in South Sudan ranged from 46.7-60%; in Uganda ranged from 1-33%; and in Sudan ranged from 5-21%.

Background Information

Illegal veterinary drugs were found to have penetrated many markets and were, from casual examination of packaging and labels, often hard to differentiate from the quality drugs. The problem of trade and use of illegal veterinary drugs, which is often occasioned by poor access to affordable veterinary inputs and services, is aggravated by poor regulatory and legal oversights. There is need to establish the status, magnitude and source of illegal drugs in order to successfully combat this threat in the region. Drawing on insights from a recent assessment of illegal drugs use this brief raises awareness of the status, magnitude and origin of illegal veterinary drugs at the cross-border areas of South Sudan with Sudan and Uganda, and makes succinct regulatory and legal recommendations to fight illegal veterinary drugs in the IGAD region.

Introduction

Treatment of animals with veterinary drugs has always been the major approach to prevention and control of various animal diseases and parasites in livestock farming in the IGAD region. Timely access to efficacious veterinary drugs at affordable prices is therefore essential for many people’s livelihoods. Many factors including illegal veterinary medicines harmfully influence delivery of effective disease prevention and control programmes. Illegal veterinary drugs are widespread and are often hard to differentiate from the quality drugs. This is further compounded by weak regulatory oversight, which makes the situation dire. According to World Health Organisation (WHO), illegal drugs are products which are substandard, unregistered/unlicensed or falsified.

Illegal veterinary drugs have been reported to cause diseases, deaths, adverse reactions and encourage
development of resistant pathogens. They have negative effects on human food safety and security, contribute to high incidences of antimicrobial resistance (AMR), and ineffective control of animal-borne diseases, and therefore can be devastating to livelihoods of livestock owners. In the Animal Health pharmaceutical industry, the illegal medicines cause damage to business reputation arising from safety issues; loss of confidence in authentic medicines by veterinarians, consumers and animal owners; reduce research and development investment for new drugs; and diverts resources towards mitigation of illegal drugs. Illegal veterinary medicines decrease agricultural productivity where it aggravates poverty and increases food price. Governments loose revenues from evaded tax and increased public expenditure required to counter illegal veterinary medicines by regulators and enforcement agencies. The International Federation of Animal Health estimates that the trade in sub-standard and non-registered veterinary drugs in Africa is worth USD400 million a year, the same size as the official market (FAO 2012). The purpose of this policy brief is to enhance awareness and advocacy on key challenges and study findings, and mobilize resources and stakeholders to implement the proposed policy recommendations.

Study Objective

The objective of the study was to assess the status, magnitude and source of illegal (expired, understrength, diluted, adulterated or fake) veterinary drugs use in the cross-border areas of South Sudan with Sudan and Uganda.

Approaches and Results

Approaches

The assessment targeted the cross border areas of South Sudan with Sudan and Uganda. A cross-section study involving key stakeholders in the veterinary drugs supply chain was conducted to address the study objective. Data was collected using standard structured questionnaires, focused group discussions and key informants interviews.

Results

Generally, the awareness of existence of illegal veterinary medicines at global level and local level was low among drug shops owners, CAHWs, drug vendors, drug distributors, and livestock owners. Majority of stakeholders were unable to differentiate the expired, understrength, diluted, adulterated or fake drugs from quality drugs.

Illegal veterinary drugs were present at the cross-border areas with drug supply chain stakeholders admitting to have sold or used illegal drugs. The most frequently expired, understrength, diluted, adulterated or fake veterinary medicines, as perceived by the supply chain stakeholders, were antibiotics, anthelmintics, trypanocidals, acaricides and vaccines.

The reasons why the various stakeholders in the drug supply chain preferred illegal drugs identified in the study were lack of professional animal health service providers which directly or indirectly influenced the other drivers of the trade and use.

The study revealed poor notification of illegal drugs by the supply chain stakeholders to the relevant authorities. Part of the reasons given for not reporting were: there is no veterinary services in the area, did not know the reporting procedure, did not know where to report, it is not my obligation to report and could not tell the fake drugs from quality ones.

The sources of illegal veterinary drugs were identified as Sudan and Uganda for South Sudan; the local markets, Chad and South Sudan for Sudan; and Democratic Republic of Congo, South Sudan and local markets for Uganda. Lack of veterinary diagnostic laboratories with drug testing capacities in the study areas was noted to be a major setback in dealing with illegal drugs menace.

There is rampant use of illegal veterinary drugs in the cross-border areas of South Sudan with Sudan and Uganda. It was found that out of the veterinary drugs used in the study areas, the estimated
prevalence of illegal drugs as reported by different supply chain stakeholders in South Sudan ranged from 46.7-60%; in Uganda ranged from 1-33%; and in Sudan ranged from 5-21%.

The study indicated inadequate financial and professional human resources for provision of quality veterinary services, including regulation of veterinary drugs and control of illegal drugs at the cross-border areas. With this glaring shortage of both finances and veterinarians and para-veterinarians in the study locations, it would be very difficult to stewardship veterinary drugs, and manage illegal drugs as well.

In South Sudan, Sudan and Uganda, there are no regulatory authorities exclusive for veterinary drugs. The veterinary and human drugs are regulated by the same regulatory agencies affiliated to ministries responsible for public health, with poor attention given to veterinary drugs. Illegal veterinary drugs threat is a cross-border problem that would require a collaboration between nations to combat. It was revealed that there is no regional policy to coordinate and harmonize drugs regulation and illegal drugs interventions in the IGAD region.

Key Challenges

1. The scope of the present study was limited in terms of time, funding and reach. To acquire more accurate and comprehensive data on magnitude, including socio-economic impact of illegal drugs in the region, IGAD should consider a more in-depth quantitative and qualitative study.

2. Inadequate financial and professional human resource in Member States to support veterinary drugs regulation and control illegal veterinary drugs.

3. Inadequate and weak enforcement of existing laws and regulations governing veterinary medicines. The situation is compounded by the fact that in most Member States there are no dedicated/specific policies and legal frameworks governing the manufacture, sale and use of veterinary drugs.

4. Absence of coordinated regional approach to veterinary drugs regulation and control of illegal drugs in the region.

5. Non-availability of quality veterinary drugs in most Member States, particularly at the regional cross-border areas.
6. Low awareness of illegal veterinary drugs amongst the drug supply chain stakeholders and the public in the region.

7. Inadequate laboratory capacity (financial and physical) to test veterinary drugs in support of drug regulation in IGAD region.

Policy Recommendations

The following recommendations to strengthen regulation of veterinary drugs and combat illegal veterinary drugs were formulated:

a. To sufficiently manage illegal veterinary drugs trade and use in the IGAD Member States, there is need for an inclusive (public and private stakeholders) review of the underpinning legal and policy frameworks and the governance structure, to develop a regional framework that will be domesticated at member state level. In the meantime, each Member State needs to develop regulations under the existing laws to curb the rampant trade and use of illegal veterinary drugs;

b. The governments are urged to revise and enforce existing policies, laws and regulations governing veterinary medicines to adequately address regulation of veterinary drugs and vaccines in line with the internationally recommended best practices;

c. IGAD Member States need to consider establishing fully functional veterinary drugs regulatory agencies domiciled in the ministry responsible for animal resources through statutory instruments;

d. The drug regulators and ministries responsible for animal health need to be facilitated to train and create awareness to veterinary drugs supply chain stakeholders on responsible and prudent use of veterinary drugs and on presence, effects, identification and reporting of illegal drugs using all avenues of communication including social media to target messages;

e. In view of this study revealing presence of illegal veterinary drugs in the region, the drug regulators and ministries responsible for animal health in close collaboration with counterfeit control agencies are recommended to enhance post market drug surveillance, pharmacovigilance inspections and monitoring of drugs in the IGAD region with regular sharing of the results;

f. The national and local governments, and the national drug regulators need to employ an adequate number of veterinary professionals in the cross-border areas to perform their obligations, especially veterinary drugs regulation;

g. In collaboration with Member States IGAD shall facilitate selection of a regional quality assurance laboratory for veterinary drugs and strengthen it to serve IGAD member countries.

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