Question: Is there a lack of regulation and scientific evidence which could negatively impact public safety and not result in improved veterinary medical services to the public?

The legitimate concerns of correspondents to the petition highlight the very reason why there should be an ACVBM. Until there is appropriate regulation, practitioners are much better placed to evaluate the safety of a product than the general public is. There are ways and means of establishing quality and reliability of botanical medicines. We emphasize the importance of the veterinary profession supporting animal health with botanical medicine rather than the general public seeking advice and products via the internet or non-veterinarians.

Were veterinarians in a position of having absolutely no knowledge of herbal medicine, the absence of a veterinary botanical medicine college that could provide safe answers to the public might be excusable; but now that veterinarians have discovered botanical medicines that safeguard animal well-being while responsibly filling a demonstrated public need, we strongly suggest the veterinary profession has an obligation to provide such a college, where the needs of the public and their animals can be prioritized.

Safety of patients is paramount. There is a comment on the interaction of herbs with anesthetics and analgesics - we know there are interactions with all drugs. This is exactly the area that the ACVBM can advise upon, as having knowledge and experience in utilizing botanical medicines with drugs means risks can be mitigated and potential side effects from drugs alleviated.

While the AMA does not recognize a similar specialty, this should not be a reason to suggest that the ACVBM has less rigor and less care than human medicine. We are in a unique situation as veterinarians being trained across species and having the ability to evaluate and critique information and applicability to medicine. Conventional veterinary medicine frequently requires us to consider the use drugs off label and where no research has been conducted. A cautious approach has been taken by the ACVBM, and there is a cumulative several hundred years of experience in the group to be able to guide safe use. Most practitioners of botanical medicine use consistent, quality products where issues around safety have been evaluated. It is the pet or stock owner that goes unguided to the internet, and even the veterinarians who send a client to the health food store to buy a herb that puts the patient at potential risk.

The ACVBM can help guide policy and regulation and advise on appropriate use of botanical medicines based on product quality, efficacy and safety. Currently members of the ACVBM have been involved in product development, research and regulation, and with the College accepted by the Profession, this will give more strength to the profession's involvement in ensuring animal safety from an informed perspective.

Finally, under this concern, there is a comment that there doesn’t appear to be a core charter of diplomates with the expertise to guide this group. We have purposefully excluded having Charter Diplomates. However, we have eight Diplomates on our organizing committee that will work with the
rest of the committee towards the development of new evidence based knowledge. One Diplomate is already involved in a multicenter clinical trial of a botanical formula through specialty practices.

A number of the organizing committee members will present their credentials and undertake the first examination proposed for 2018, should the College be approved. This will help us to determine the pass rate for the examination and to build our Diplomate base as has been done with other RVOs establishing themselves in the first instance.