



From:

Saad Enouri, BVSc, MSc, PhD
Research Associate, Canadian gFARAD
Ontario Veterinary College
senouri@uoguelph.ca
Telephone: 519-824-4120 ext. 54984

To: [REDACTED]
Telephone: [REDACTED]
Fax: [REDACTED]
Email: [REDACTED]

Re: Paracillin® SP
Case Id: ON-110521-23852
Date of Response: Nov 7, 2021 8:36:57 AM

Case Information:

Date Submitted Nov 5, 2021 11:56:29 AM
Species Turkeys
Number of Animals 8000
Location of Animals
Reason for Use Treatment
Drugs Administered

Drug Trade Name	Generics	Route	Dose	Diseases
Paracillin® SP	• amoxicillin	Oral - Water	16 mg/kg (of body weight) Continuously for 5 days	• Systemic: colibacillosis

Response and Recommendation: 10 days

Amoxicillin trihydrate is approved for use in chickens in Canada as a water additive at "10-20 mg, to provide 8-16 mg amoxicillin trihydrate, per kg body weight per day", for up to 5 days with a meat withdrawal time of 2 days. This official withdrawal time is based on an MRL in chicken tissues of 10 ppb. There are no maximum residue limits for amoxicillin in turkeys in Canada, so any amount detected at slaughter constitutes a violative residue. In Europe, amoxicillin trihydrate is approved via the drinking water in turkeys up to 20 mg/kg of body weight for up to 5 days with a withdrawal time of 5 days. In Europe, the MRL for amoxicillin in edible tissues of all food producing species, including poultry, is 50 ppb. In general, turkeys tend to eliminate drugs more slowly than chickens. We have been unable to find any published data following oral administration of amoxicillin in turkeys upon which to base specific withdrawal recommendations. Considering the low levels of detection of the CFIA and from a human food safety standpoint, we believe that a withdrawal interval of at least 10 days should be followed for this use of amoxicillin in turkeys.

Therefore, the Canadian gFARAD recommends a withdrawal interval of 10 days, which should be sufficient so that detectable residues are not found. Furthermore, this recommendation for residue avoidance does not address the risks of developing or transmitting antimicrobial resistance from treated animals to other animals or humans following the extralabel use of this antimicrobial. Because the Canadian gFARAD withdrawal recommendation is not an official withdrawal time and is based on data that has not been reviewed nor approved by the Veterinary Drugs Directorate or the Canadian Food Inspection Agency, responsibility for residue violations rests with the attending veterinarian.