

Ridley AgriProducts Pty.Ltd

Submission to Therapeutic Goods Administration in
relation to Draft Code of Good Wholesaling Practice for
Medicines in Schedules 2, 3, 4 and 8
23rd October 2009.

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Background on Ridley AgriProducts

Ridley Corporation is a 100% Australian-owned public company with sales revenue of \$819.4 million in F09. Our business is conducted through two operating divisions, Ridley AgriProducts and Cheetham Salt. The principal activities of the Ridley group are stockfeed manufacturing and marketing; production of crude salt, salt refining and marketing.

Ridley AgriProducts (RAP) is the largest stockfeed producer in Australia with a number of major brands, including Barastoc, Rumevite, Cobber Aquafeed.

The company has achieved its business success and high standing in its markets through a combination of factors. In Australia, Ridley AgriProducts employs 550 people nationally.

Ridley AgriProducts has 19 manufacturing plants, producing 25-30% of the total national compound feed production of approximately 5 million tonnes. The business supplies animal feed to all Australian animal industries including poultry, pig, dairy, beef and aquaculture species. All animal feed plants have FeedSafe® (Stockfeed Manufacturers Council of Australia code of good manufacture) accreditation while all but one site has third party certified HACCP plans in place. Our Aquaculture plant also has ISO 9000 accreditation, while our Wacol supplement plant have AVPMA GMP certification.

Queensland

Clifton, Dalby, Toowoomba, Wacol, Townsville and Narangba (Aquaculture Feeds)

New South Wales

Tamworth, Taree, Corowa

South Australia

Murray Bridge, Wasleys

Victoria

Bendigo, Dandenong, Maffra, Mooroopna, Pakenham, St Arnaud, Terang, Gunbower

The majority of these sites currently have poison licences that allow the inclusion and sale of wholesale of animal feeds containing S4, S5 and S6 drugs.



Photograph of one of the Ridley stockfeed mills in Victoria (Terang)

Therapeutic goods use in animal feed

Therapeutic goods are routinely used in animal feeds for the following classes of animal pigs, poultry and ruminants (dairy, beef and sheep). RAP has a series of internal HACCP and FeedSafe procedures and policies that ensure all therapeutic goods on our sites are effectively purchased, stored, safely dispensed and formulated into feed, labelled, transported and finally reconciled.

S4 drugs are only included in animal feed after receiving registered veterinary practitioner authorisation.

Comments about the Draft Code of Good Wholesaling Practice for Medicines in Schedules 2, 3, 4 and 8.

RAP is very supportive of the introduction of A Code of Good Wholesaling Practice for Medicines in Schedules 2, 3, 4 and 8. Specifically in relation to the Draft code we would like to make special comment about the following elements:

Section 1

1.5 Buildings should be kept free of rodents, vermin, birds, pets and pests – *RAP actively supports robust pest management in the feed mill, however given the rural locations, abundance of food sources and building construction it is not possible to keep feed mills absolutely free of rodents and other vermin. RAP recommends revised wording that encourages robust pest management rather than current 'should be kept free of rodents*

Section 5

5.3 A system should be in place to give assurance of the trustworthiness of employed and contracted delivery personnel, for example, through proof of identity and criminal records, employment history and reference checks – *RAP actively supports robust personnel checks to ensure the trustworthiness of employed and contracted transport personnel. In many rural areas it is not practical due to timeliness issues to complete criminal record checks prior to the employment of casual labour. While we acknowledge that it is only an example, it is our experience with other industry related codes of conduct that examples are often taken literally. RAP recommends that the note relating to criminal record checks (in the example) be removed.*

Section 9

9.1 Management should carry out a security risk assessment and

9.6 All external doors to premises that are not commonly used should be fitted with audible alarms to alert staff when opened – *RAP actively supports site security. It would be our recommendation that element 9.6 is in fact a measure that would be identified on a site by site basis depending on the completion of element 9.1. Element 9.6 could be included as an example of an outcome from undertaking a site security risk assessment. Many feed mills are located in rural areas where the risk on intrusion is quite low. Further to this many feed mills sites are large sites that have external fencing where establishing audible alarm systems for external gates would be expensive and provide limited security value for that site. RAP also considers that element 9.8 is effectively meeting the requirement stated in element 9.6.*

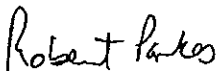
Final comments

RAP is the largest commercial animal feed manufacturing in Australia, with sites in all Eastern Australian states. Animal feeds regularly contain S4 drugs at the request and authorisation of registered veterinary practitioners. RAP manages the purchasing, inclusion in feed, transport and reconciliation of S4 drugs via a series of HACCP and FeedSafe policies and procedures.

RAP is very supportive of the introduction of A Code of Good Wholesaling Practice for Medicines in Schedules 2, 3, 4 and 8 and appreciates the opportunity to comment on the draft code. RAP comments in relation to Section 1.5, 5.3, 9.1 and 9.6 are related to practicalities rather than not supporting the intention of the code.

We would welcome the opportunity to discuss these comments in more detail as the need arises.

Yours Sincerely



Robert Parkes
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