



## North Dakota Veterinary Medical Association

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### In Opposition of SB 2388

February 3, 2025

Chair Lee and Members of the Senate Human Services Committee,

I am Dr. Laura Beaudoin, and I am the founder and veterinarian for Comforts of Home Veterinary Care in Bismarck. As a past president of the North Dakota Veterinary Medical Association (NDVMA), I am testifying today on behalf of NDVMA to voice **opposition to SB 2388**. Our organization proudly represents over 300 veterinarians across diverse disciplines, including companion animal, exotic, livestock, food and fiber animal, and equine medicine, as well as veterinarians in research, academia, and government. For more than a century, the NDVMA has been a steadfast advocate for the veterinary profession. We are committed to ensuring that statutory changes not only protect the interests of the public, our clients, and patients, but also recognize the practical realities of veterinary practice and support the ability of veterinarians to provide safe and effective veterinary services.

The NDVMA represents a diverse group of veterinary professionals who are concerned about the potential negative consequences this bill may have on both public and animal health, particularly regarding the accidental exposure of pets to ivermectin and its misuse in veterinary care.

#### **Risks of Accidental Exposure and Poisoning**

One of the most pressing concerns we have is the increased risk of accidental exposure to ivermectin for household pets. As veterinarians, we are familiar with cases where pets were harmed due to exposure to ivermectin products intended for large animals. For example, we recall incidents where canines ingested ivermectin after encountering improperly discarded equine deworming tubes or after consuming snow contaminated with ivermectin-treated cattle pour-on.

These types of accidental exposures can lead to serious health complications for pets, particularly dogs. The risk would only be heightened if ivermectin is available over the counter and is more readily available in households where it might be improperly stored or more easily accessed by pets. Dogs, especially breeds like Shetland Sheepdogs, Old English Sheepdogs, Australian Shepherds, English Shepherds, German Shepherds, Long-haired Whippets, and a variety of mixed-breed dogs, are at particular risk for toxicity due to their sensitivity to ivermectin. These breeds can have a particular sensitivity that results in acute neurotoxicity even at appropriate medical treatment doses.

Animal exposure to over the counter (OTC) human medications is not a rare occurrence. OTC human medications consistently rank as one of the top ten poisons in cats and dogs. Whether the exposure is accidental or due to an uninformed owner, the results can be disastrous.

#### **Potential Misuse as a Dewormer**

Furthermore, making ivermectin available without a prescription could encourage pet owners to use OTC human formulations of ivermectin to treat their pets. Inappropriate use of ivermectin for deworming in dogs

and cats could lead to overdosing, adverse reactions, or even death. Kittens and puppies are especially at risk due to their innate nature to explore things by chewing and their small size. Currently, veterinarians play an essential role in advising pet owners on the safe and effective use of dewormers, ensuring that pets receive the correct dosage and formulation.

Ivermectin resistance in animals is also a growing concern, especially in livestock and companion animals where the drug is used to control parasites like gastrointestinal nematodes, mites, and lice. Resistance has been widely reported in parasites affecting cattle, sheep, goats, horses, and dogs. To limit the development of further resistance, care must be taken to ensure appropriate dosing regimens, for pets, livestock and humans alike. Medical consultation is critical in this regard. Further availability of ivermectin as an OTC medication could result in additional misuse and increased concerns for resistance.

### **Criteria for Over the Counter Drug Use**

According to the Food and Drug Administration (FDA), for a drug to be marketed without a prescription, the FDA determines whether the drug is safe and effective for use by a consumer without supervision by a licensed healthcare provider and has low potential for misuse and abuse. Since the Covid-19 pandemic, poison control centers nationwide have encountered a significant influx of calls related to the use of ivermectin as a treatment of Covid-19. The Center for Disease Control and FDA both have issued advisories regarding the misuse of ivermectin. The American Medical Association, the American Pharmacists Association, and the American Society of Health-System Pharmacists strongly oppose the ordering, prescribing, or dispensing of ivermectin to prevent or treat Covid-19. The misuse of ivermectin is significant.

### **Conclusion**

The NDVMA respectfully urges the North Dakota Legislative Assembly to reconsider the proposal to make ivermectin available over the counter that is formulated for humans. We are concerned that this bill would lead to an increase in accidental poisonings, misuse, and overuse of ivermectin, all of which would have detrimental effects on both animals and humans in our state. By maintaining a prescription requirement for human-use ivermectin, we can ensure that its use remains safe and appropriate for both animals and humans.

Thank you for your attention to this important matter. **We respectfully request that you oppose SB 2388** to protect the health and safety of the public and the animals we care for in North Dakota.

Sincerely,



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