



WPSA Bravecto Position Statement (Use on Wombats)

In July 2022 the Wombat Protection Society of Australia (WPSA) created a fact sheet comparing the various permits provided to the wildlife sector by the Australian Pesticides and Veterinary Medicines Authority (APVMA) permitting products for the treatment of sarcoptic mange in wombats and asked for comment from the sector. The main aim of the exercise was to advise the sector of what WPSA understands to be the variations in these permits as WPSA had been informed and had seen on social media incorrect uses of the permits.

WPSA provides training and letters of authorisation to act under two of the, now, four permits for “Minor Use” supplied by the APVMA. Three of these are Moxidectin based, one newest permit Fluralaner. The exercise in contrasting the permits was to remind treaters of issues in all permits, including those held by WPSA.

WPSA has no relationship with any product supplier/manufacturer nor does the Society charge for training to people wishing to work within the structure of the permits held by WPSA nor do people have to be members of WPSA to receive authority to act under permits held by WPSA following training.

There were few responses in general to the Fact sheet comparing permits, and WPSA thanks those who took the time to read and respond. One response erroneously indicated that the WPSA was “against” trialling the use of Bravecto (active ingredient Fluralaner) to treat wombats with mange. Another (from a Government Department) was under the impression that a “Fact Sheet” produced by the University of Tasmania prior to the APVMA allowing the minor use permit for Fluralaner allowed its use generally; another suggested that so few wombats are treated for mange in any way that there shouldn't be concerns about the potential for environmental toxicity of Fluralaner and Dr Carver from UTAS put to us his position that it was acceptable to mix Bravecto with another product and we assume therefore thus be able to apply via burrow flaps or pole and scoop. Dr Carver also expressed his opinion that Fluralaner could be used on severely mange affected animals and queried why our document considered the higher dose permit allowing moxidectin delivered by pole and scoop to moderately and severely affected adult wombats “quicker” than Fluralaner and expressed his opinion that our permit comparison contained opinion and should not be called a Fact Sheet.

*The WPSA supports as one option for treatment any product authorised for use as per APVMA permit guidelines which are very specific for Fluralaner or undertaken under appropriately trained Wildlife Veterinarians. The APVMA Fluralaner permit clearly states it is NOT to be used on wombats 5 kilos or less and IS to be applied by pipette (spot on) following the manufacturer's instructions. The Fluralaner permit (minor use) is held by Intervet Australia, the distributors of Bravecto, a product owned by MSD and their application instructions are quite specific. Hence, WPSA is not suggesting that either the APVMA or Intervet/MSD have in any way failed to properly supply information; what WPSA is suggesting is that mange treaters have been so impressed with the potential for Fluralaner to help manage mange that they are acting outside the parameters of the Fluralaner permit.

If used correctly the Fluralaner permit would, in our opinion, limit its' application to captive wombats primarily, and would have given time to establish the reporting of any adverse reactions. It is only very recently (Wilkinson et al.2021) that a small sample study of healthy captive wombats established pharmacokinetics outcomes for Fluralaner spot on use on healthy, adult wombats using one dose only. In that same study it was reported that three mild to moderately mange affected animals taken into care, two juvenile and one adult were treated, pharmacokinetics were not presented for those three animals.

WPSA knows of anecdotal reports of "success" using Fluralaner, but we also know of at least one report of wombat death following the use of Bravecto. WPSA is also concerned that some treaters have the impression that one application of Bravecto will "cure" mange, that some are using it weekly, and that some start treatment with Moxidectin and then when they think they may not be able to keep treating the wombat use Bravecto. Some have been literally mixing Bravecto and Cydectin together.

WPSA notes Veterinary Surgeons may also use and prescribe products for "off label" application outside of the permit system, and researchers may achieve Animal Ethics approval through a variety of systems that vary State to State to do similarly. Veterinary/ Animal Ethics approved use of products have the advantage of tight adverse effects reporting and, in many cases, proper examination of the animal being treated.

The above exceptions do not extend to treaters acting under the permits (unless they are working under Veterinary or Ethics Approvals) in which case they are not acting under permits. There are also differences State to State regarding permissible methods of treatment irrespective of APVMA permits, in Victoria treatment kits can be sent to members of the public, in NSW (currently) members of the public cannot treat; in Tasmania a separate permit is required to approach a wombat using pole and scoop. It is vital these issues are understood, particularly when information is coming from people interstate or researchers who may have approval to act from their jurisdiction/approval source different to in field treaters acting under the APVMA permits.

WPSA is very concerned that failure to act strictly in accordance with permits and State to State legislation has the potential to totally derail the whole treatment program we have fought so hard and for so long to establish and could see the APVMA restrict or remove all minor use permits from mange treaters.

Following responses to the WPSA Permit Fact Sheet as a result of what we view as confusion in the treatment field we posed several questions regarding the Fluralaner permit to the APVMA to seek their opinion and advice. We will distribute this to the treatment field as soon as we receive it.

WPSA also wishes to be totally transparent regarding concerns and WPSA does have serious concerns regarding potential environmental impacts if Fluralaner is widely used in burrow flaps. The entire class of isoxazolines (Fluralaner) passed through the various overseas regulatory authorities on the basis they were to be used for companion animal treatment only, hence avoiding broader environmental studies such as are needed to register products for agricultural/ food animals as they were to be limited to dogs, initially as chewable/ later dogs and cats as spot-on. Concerns regarding this class of chemicals were addressed by limiting the number of doses per packet, child resistant packaging and later warnings about not patting pets after treatment and still later warnings about potential adverse (primarily neurotoxicology) effects, warnings that the products could cause harm to the unborn child. The point is, changing a spot on to a pour on product or using for wide distribution as via burrow flaps is not, in the opinion of the WPSA appropriate unless and

until the same rigorous environmental studies as would be required for a stock product be published.

WPSA accepts that there are environmental issues regarding moxidectin, but the point is these are known and well documented, whereas virtually no environmental studies have been done for Fluralaner. Moxidectin is a product that was derived from a naturally occurring soil bacterium from Australia and our opinion is that Australian animals have been exposed to the now synthesised form of the molecule where that is not the case for Fluralaner. Unfortunately, the only environmental studies occurring are towards expanding the use of Fluralaner as an agricultural product and it is showing toxicity to a wide array of insects, pest and otherwise, including pollinators like honeybees.

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