



INDEPENDENT REVIEW OF DISPENSING

FVE CONTRIBUTION

The Federation of Veterinarians of Europe (FVE) is an association of veterinary organisations from more than 30 European Countries, which represents and promotes the veterinary profession in Europe.

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Industry and Research
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FVE is grateful for the opportunity to contribute to the Independent Review of Dispensing and to assist the Review Group in its work.

FVE believes that classification of products authorised in the European Union (EU) should be harmonised, but that choice of distribution routes should be left to the individual EU Member States.

Classification

FVE is in favour of a two-tier system for the classification of veterinary medicinal products: prescription only medicines (POMs), which must be prescribed by a veterinary surgeon, and non-prescription only medicines (non-POMs), which may be purchased without a veterinary prescription.

In addition, the use of certain products must be restricted to veterinary surgeons only, when the safety, quality or efficacy profile of these products would require specific skills or precautions during their administration.

For example, it is important to differentiate between vaccines, which are used against diseases subject to a formal (national or EU) eradication or control program and those vaccines used against other diseases. Both classes must be POMs but the former should be administered by a veterinary surgeon, as their possible misuse or misadministration could have disastrous consequences on the eradication or control program. Furthermore, the vaccination is likely to be combined with some sort of certification and it is appropriate that the administration should be restricted to veterinary surgeons if they are then expected to certify that the animals have been vaccinated or not vaccinated.

FVE understands that most products authorised in the EU for veterinary use have a similar classification in all EU Member States. There seems to be however a few classes of products, such as anthelmintics, dry cow therapies or inactivated vaccines, for which classification differs from one country to another.

Classification is primarily determined by the risk that the use of a product represents for the target animal, the user and the environment as well as for the consumer in the case of products administered to food-producing animals. There are therefore few reasons why the risk should be different from one country to another and therefore why classification should

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differ between countries. Classification must therefore be harmonised throughout Europe to provide an equal level of safety, to avoid competition distortion as well as illegal imports.

Furthermore, products such as dry cow therapies, which contain antibiotics, should be classified as POMs throughout Europe, in view of the current and serious concerns on antimicrobial resistance and the need to limit the overuse or misuse of antimicrobial substances. Similarly, the emergence and the increase of resistance to anthelmintics plead for tighter controls and for the classification of these products as POMs.

Distribution

FVE considers that distribution is a national competence. However, the first objective of any distribution system must be to protect public health. It is therefore essential to build a system geared to providing animals with the appropriate treatment when needed and to avoiding that such treatment results in violative residue levels in the produce or meat of food-producing animals. Cost of medicines should therefore be a secondary issue when designing distribution systems.

FVE furthermore believes that from a farm management viewpoint, veterinary medicinal products costs represent a small percentage of the overall costs of running a farm. Thus, the economical advantage of one distribution system to another would be marginal for the farming community. On the other hand, changes to the distribution system can have a major impact on veterinary practice, on practice management and on the provision of veterinary services in rural areas.

Dispensing of veterinary medicinal products is important for many veterinary surgeons practising in rural areas. Without the income generated by the dispensing of products, many practices would indeed not be financially sustainable. Dispensing is therefore seen as essential to maintain a network of veterinary surgeons in rural areas.

In some countries veterinary surgeons are however not allowed to dispense veterinary medicinal products (Italy) or are not allowed to make any profit from the sale of medicines (Sweden, Denmark, Finland). However, in most cases veterinary surgeons will charge higher fees when providing a service to compensate for the loss or absence of income from the sale of medicines. This is typically the case in Sweden and Denmark.

In other countries, where veterinary surgeons have the right to dispense veterinary medicinal products (France, Germany, the Netherlands), veterinary surgeons make a profit from the sales of medicines. This is usually a well accepted practice by the farming community as well as pet animal owners, which recognise that otherwise the overall costs would be higher. Veterinary surgeons would indeed increase their fees to compensate for the lack of revenue from the sale of medicines, whilst other professionals would sell medicines and making also a profit from such sale. It is also important to note that reduction of medicines prices in Denmark has not been achieved through a change in the distribution system, but by imposing maximum profit margin on the sale of medicines.

One of the arguments advanced to limit the veterinarian's right to dispense is that when veterinary surgeons are authorised to prescribe and dispense, they will inevitably prescribe more to sell more, and thus make a greater profit. FVE can not support this view.

Farmers will always choose the veterinary surgeon offering the best service at the best price. Thus, an over-prescribing veterinary surgeon can not be the best choice for a farmer and will soon be replaced. Therefore, in such a competitive environment as the farming community,

veterinary surgeons can only maintain their business by dispensing the right amount of medicines at a correct price.

Furthermore, when other health professionals can also dispense veterinary medicinal products, as it is the case in the UK with POMs that can be purchased from pharmacies, there is a reasonable amount of pressure to guarantee that prices will be kept at a competitive level.

Another important factor is that the direct dispensing by the veterinary surgeon having examined the animals on the farm is certainly most convenient for both the animal's owner and the animal itself. This is especially important in remote areas where other health professionals might not be as readily available as the veterinary surgeon attending the animals and making the diagnosis. From an animal welfare viewpoint, dispensing by veterinary surgeons also allows immediate treatment of the animals.

Finally, resistance problems require a more responsible use of antimicrobial and anthelmintic substances. Also, residues of veterinary medicinal products, which must be kept under tolerated limits, require the appropriate use of veterinary medicinal products. Many codes of Good Veterinary Practice have been developed or are being developed to advise veterinary surgeons. Education of animal owners is however also essential to promote and ensure the correct and responsible use of veterinary medicinal products. The dispensing time is the time of choice to inform and educate animal owners. The attending veterinary surgeon, who regularly comes to the farm, can thus promote the responsible use of medicines to the farmer, when prescribing and dispensing.

When dispensing, veterinary surgeons can provide a holistic advice, which results from their knowledge of the product and of its conditions of use, contra-indications, possible side-effects, of the animal and of its living environment. This is a critical point for farm animals where for instance knowledge of the husbandry conditions, of the reproduction cycles, of the slaughter and milk collection time are essential for correct choice and use of a product. Other health professionals are unlikely to be in as good a position to advise on the use of a product, as they have no or little knowledge of the animal living environment, which is the cornerstone to proper advise.

Veterinary surgeons are also more sensitive to side effects, residue problems and resistance patterns, when they dispense. They can thus ensure a better surveillance. However, when products can be purchased from various sources, and especially so for non-POMs, it is difficult for the veterinary surgeon to keep an overall view of the medicines used on the farm and to ensure a proper surveillance. This is an important issue as inappropriate self-medication contributes significantly to the building up of resistant pathogens or parasites, thereby affecting both animal health and public health. This is even more important in the context of herd health surveillance programs, where many parameters need to be adequately monitored and controlled, and especially so the use or misuse of medicines.

Recommendations

FVE would therefore invite the Review Group to:

- Re-affirm the pro-eminent role of veterinary surgeons in the prescription, dispensing, administration and surveillance of medicines used in the field for the protection of public health, animal health and animal welfare;
- Encourage greater harmonisation of classification of veterinary medicinal products between EU Member States;
- Recommend tighter controls on antimicrobial and anthelmintic substances;
- Retain the current UK distribution channels, where animal owners have the choice of buying medicines direct from their veterinary surgeon or from a pharmacist against a veterinary prescription.

Independent Review of Dispensing

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15 August 2000

Dear Pierre

INDEPENDENT REVIEW OF DISPENSING BY VETERINARY SURGEONS

You should by now have received a copy of my letter of 11 August inviting “interested organisations” to submit evidence to the Independent Review Group to assist it in taking forward the terms of reference set for it by Ministers which were described in the News Release also attached to that letter.

The Review Group held its first meeting on 9 August and expressed a wish to meet representatives from the Commission and to make visits to a number member states. The purpose of these visits will be to provide the members of the Review Group with background information on the dispensing practices for prescription only veterinary medicines within the European Community. This will assist the Group in its objective of reviewing the current practice in the UK whereby virtually all veterinary prescription only medicines are dispensed by veterinary surgeons and in considering the impact this practice may be having on prices charged to their clients.

Along with the Commission, the Review Group hope to meet representatives of the relevant Belgium Government Department and the purpose of this letter is to ask whether the FVE would be interested in meeting the Review Group when it is in Brussels for that purpose. I cannot give you an exact date for this visit, as the arrangements are currently in hand with our Embassy and Permanent Representation, however I expect that it will take place during October/November

or possibly December. The meeting would of course in no way preclude the FVE from submitting evidence to the Review as requested in my earlier letter.

If the FVE would like to meet the Review Group as suggested above please let me know. I will then speak to you about possible dates/timing etc.

Yours sincerely

Chris Bean
Secretary, Independent Review of Dispensing



News Release



277/00

7 August 2000

ACTION PLAN FOR FARMING: INDEPENDENT REVIEW OF DISPENSING BY VETERINARY SURGEONS

Agriculture Ministers have announced the appointment of Professor Sir John Marsh CBE as chairman of the Independent Review of Dispensing by Veterinary Surgeons. In addition they have announced the appointment of Dr Jeremy Lucke, Mr John Moffitt and Lady Patsy Yardley as members of the Review Group.

The Review Group will hold its first meeting on 9 August and will commence its work by seeking evidence to enable it to review the current practice whereby virtually all veterinary prescription only medicines (POMs) are dispensed by veterinary surgeons and the impact this practice may be having on availability and prices. In addition, the Group will review the classification of veterinary medicinal products that are currently classified as POMs, to determine whether certain products should be made more widely available. It will make its report to Ministers by 31 March 2001.

Notes for Editors

1. The Independent Review of Dispensing by Veterinary Surgeons was announced by the Minister of Agriculture, Fisheries and Food as part of the Government's Action Plan for Farming launched at No. 10 Downing Street on 30 March. An update on progress made on all areas of the Action Plan so far is available in the Action Plan for Farming bulletin www.maff.gov.uk/farm/agenttwo/strategy/index.htm.

2. The terms of reference of the Independent Review of Dispensing by Veterinary Surgeons have been determined by Agriculture Ministers and are as follows:

- To review the procedures by which prescription only medicines (POMs) for veterinary use are classified and sold in the United Kingdom and the impact current practices may be having on availability and prices.
- To make recommendations to the Minister of Agriculture, Fisheries and Food by 31 March 2001.

3. The biographical details of the Chairman and members of the Review group are as follows:

Professor Sir John S Marsh, CBE (Chairman)

Professor John Marsh was Dean of Faculty of Agriculture and Food from 1986-1989 at Reading University and, in 1990, became Director of the Centre for Agricultural Strategy based there. From 1991-1999 he was Chairman of the Agricultural Wages Board for England and Wales. He is

Chairman of the Council of RURAL (the Society for the Responsible Use of Resources in Agriculture and on the Land), President of the British Institute of Agricultural Consultants (BIAC). In 2000 he served on the Committee of Inquiry into Hunting with Dogs (the Burns Committee). He is a member of the Food Chain and Crops for Industry Panel within the UK Foresight Programme. He is a past President of the Agricultural Economics Society, and is a Fellow of the Royal Agricultural Societies (FRAGS), of the Royal Agricultural Society of England (FRASE), and of the Institute of Biology (CBiol, FIBiol). He is a governor of the Royal Agricultural College, Cirencester and a member of the Governing Body of the Scottish Crop Research Institute.

Dr Jeremy Lucke

Dr Lucke is a veterinary surgeon with a wide experience of the profession having worked in general practice, academic clinical veterinary medicine and the Home Office. He is a past President of the Royal College of Veterinary Surgeons (1990-91) and has recently retired after 18 years as an elected member of RCVS Council. He has also served as a UK expert on the European Commission's Advisory Committee on Veterinary Training, as a delegate to the Federation of Veterinarians of Europe and as an expert on the regulation of the veterinary professions in the Central and Eastern European Countries. Dr Lucke was appointed as the first chair of the Ministry of Defence Animal Welfare Advisory Committee (1996) which, as a non-departmental public body, reports to the Chief Scientific Adviser, Parliament and publishes its reports. Dr Lucke continues to be actively involved in certain charities that support the veterinary profession.

Mr John E Moffitt, CBE DCL FRASE

John Moffitt has spent his lifetime as a practising farmer in Northumberland. He developed the renowned Hunday Pedigree Herd of 350 Holsteins. He pioneered Electronic I.D. Feeding and Recording Systems in the 1980's as Chairman of Hunday Electronics. He was also Chairman of the national AI and Embryo Transfer Company, Premier Breeders. He is currently a Director of the Roslin Institute of the BBSRC. He has served on

The Swann Committee 1971-75, assessing the future needs of the Veterinary Profession;

The Selborne Committee 1997-98, veterinary research;

The Richmond Committee 1989-90, Biological Food Safety, and

The Banner Committee, Ethical implications of Genetically Engineered Farm Animals

Lady Patsy Yardley

Lady Yardley graduated from the Birmingham College of Art and Crafts in 1954, and gained the Diploma in Education from Oxford University in 1978. She served on the Oxford City and Oxford County Councils within the period 1969-91, her main committees being education and Planning. She also served as Sheriff and Lord Mayor of Oxford. Lady Yardley breeds Burmese cats, is a Regional Adviser and Committee Member of the Burmese Cat Club and takes a keen interest in animal welfare.

4. The secretariat of the Independent Review of Dispensing by Veterinary Surgeons will be provided by the Veterinary Medicines Directorate, Woodham Lane, New Haw, Addlestone, Surrey KT15 3LS (tel: 01932-336911; fax: 01932-336618) to whom all enquiries about the Review should be addressed.