

HM Government

## Review into the Integrity and Assurance of Food Supply Networks

# Note of meeting with Veterinary Medicines Directorate (VMD)

**Location:** Nobel House

**Date:** 9 January 2014

**Attendees:**

Simon Hack - Head of Enforcement Team - VMD

Sarah Appleby – Secretary – Review into the Integrity and Assurance of Food Supply Networks

## 1. Introduction to the Elliott Review

SA thanked SH for taking the time to contribute to Professor Elliott's Review. She noted that Professor Elliott published his interim report on 12 December 2013, and his final report is due in spring 2014. She explained that the interim report contains a number of recommendations on which Professor Elliott is now seeking further input to enable early implementation, where possible, of measures to provide assurance in the food supply chain.

## 2. Introduction to VMD

SH explained that VMD is an Executive Agency of Defra. It has about 160 staff and is based in Weybridge. The Chief Executive Officer is Peter Borriello. SH leads the Enforcement team, which is part of the Operations Group led by Paul Green. Legislation and enforcement powers have been consolidated in the Veterinary Medicines Regulations 2013 (SI 2013/2033), and supplemented by a range of guidance documents for users, manufacturers, farmers etc. There are 10 inspectors that carry out checks on farms, at vets, manufacturers and dealers, to verify compliance with the regulations. Inspection of specified businesses is a statutory requirement and incurs a fee. VMD use a hierarchy of enforcement, escalating action where appropriate, based on risk. Prosecutions are taken through the Crown Prosecution Service, which can take a long time. However VMD staff have powers to serve Improvement Notices; and to seize and destroy non-complaint veterinary medicines (incinerate) and charge for costs of this action. VMD also use 'cautions' to deal with some offences, and would like to publish details on their website, and are currently seeking advice from lawyers.

Other deterrents include a 'name and shame' policy and publication of non-compliance on their website. There is evidence that industry actively use this information to ensure that they trade with complaint companies, and this links in with farm assurance schemes. VMD work closely with the Defra investigation team (part of core Defra in Rural Payments Agency). VMD use intelligence (5x5x5) reports. VMD play an active role in GAIN, and in the Working Group of Enforcement Officers, a European working group which meets twice

yearly. In particular this working group enables collaborative work between human and veterinary medicines organisations across the EU, and facilitation of cross border enforcement action. SH offered to share a presentation of a recent complex case. SH felt that VMD would support the case for a food crime unit (as recommended in Professor Elliott's interim report) and collaborate on enforcement issues.

In December 2013 VMD published a report on 'sales of antimicrobial products authorised for use as veterinary medicines in the UK' (<http://www.vmd.defra.gov.uk/pdf/VARSS.pdf>). There is concern about the use of these substances on animals likely to enter the food chain, particularly in relation to observance of 'withdrawal periods'. There is also concern about the general increase in uncontrolled use of antibiotics, and the potential increase in residues in food. VMD undertake a residue testing programme (led by Eric Crutcher), and produce an annual report.

VMD were involved with an incident in December 2013 about MRSA in a turkey flock. Whilst not thought to be a public health issue, there is concern about the transfer of MRSA to birds.

### **3. Supply chain controls**

SH discussed a number of examples where serious organised crime had involved veterinary medicines (e.g. ketamine, and lignocaine). There was a suggestion that criminals may target veterinary premises to illegally obtain veterinary medicines, or obtain products through unscrupulous vets or vets operating illegally. The Royal College of Veterinary Surgeons are responsible for registration of veterinary surgeons, and oversee a code of ethics. This would cover any illegal supply of veterinary medicines.

Some veterinary medicines are obtainable on prescription only. Some prescriptions are provided electronically, and can be used to buy products via the internet. As a response to concerns about the increase in the number of internet retailers, and the extent to which they comply with legislation, the VMD introduced the 'accredited internet retailer' scheme. The scheme provides some checks and balances, but may still be subject to fraud.

Retailers and industry may undertake their own testing for residues, and often provide feedback and share information with VMD.

The size of the veterinary medicine market is huge (worth millions of pounds) although not as large as the market for human medicine. Often the same multinational companies produce both types of products, and take great care to protect their market share. For this reason counterfeit material is not seen as an issue. The National Office for Animal Health (NOAH) oversees the pharmacy industry.

There is evidence that illegal medicines may be used to treat pets (small animals, specifically dogs and cats) and VMD work with a number of enforcement bodies, including non-public sector groups such as the RSPCA, to deal with any cases that arise.

SH expressed concern about the perceived failure of the horse passport scheme in relation to monitoring the 70 or so issuing bodies, and the lack of knowledge about the scheme by stables etc. VMD are working with the British Horseracing Authority to inform and SH referred to the recent case where illegal imported medicines had been used on race horses in the UK.

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