A ‘Model’ Internet Retailer

This document is a collection of information and procedures that the VMD considers a ‘model’ internet retailer will include.

The word ‘must’ indicates an essential requirement of the VMD’s Accredited Internet Retailer Scheme (AIRS) criteria. The word ‘should’ indicates additional features that a ‘model’ website would have. Text in blue is for information or is a suggestion that retailers may want to consider.

The website

The following must be displayed:

• The name of the owner of the business.

• The address at which the business is conducted, or a correspondence address (which may be a PO box address)

• The name and qualification of the RQP responsible for the internet retail business and how to confirm the registration status of that person*. There should be a link to the relevant professional body’s register:
  - veterinary surgeons http://www.rcvs.org.uk/registration/check-the-register-list/
  - pharmacists http://www.pharmacyregulation.org/
  - SQPs http://www.vmd.defra.gov.uk/registers/sqpregister.aspx

• Information on how to confirm the registration status of the online retail premises (this will be the link from the VMD logo to the Register of Accredited Internet Retailers, once the logo is issued)*.

• Details of the internet retailer’s general complaints procedure and, if the complaint relates to veterinary medicines and a satisfactory reply isn’t received from the internet retailer, how to make a complaint to the VMD*.

• For POM-V medicines, a statement that they may only be supplied against a written prescription.

• A link to the VMD’s Adverse Event (Suspected Adverse Reaction Scheme) online yellow form* https://www.vmd.defra.gov.uk/adversereactionreporting/

• A link to the VMD’s Product Information Database* http://www.vmd.defra.gov.uk/ProductInformationDatabase/

• The Retailer’s Terms & Conditions

* These details located in one specific section on the website e.g. ‘About Veterinary Medicines’
See Appendix 3 for a guide on what should be included on an ‘About Veterinary Medicines’ page on your website.

**Advertising**

No POM-V or POM-VPS products may be advertised on the retailer’s Homepage, pages aimed at the general public (including companion animal and horse products’ pages), or on ‘special offers’ pages.

The homepage of a website is considered to be a general public area and POM products should not be advertised on it. This includes POM-VPS products. Whilst a price list of products is not considered to be advertising, a price list should include all products in a particular category e.g. all horse wormers, not just selected ones from different product groups e.g. one dog vaccine, one horse wormer etc, as that promotes that one product over similar ones and is therefore advertising. Furthermore, to be a price list the list must contain product prices.

Further to the above, advertising POMs to the general public is not permitted. This includes promoting POMs to the public by offering ‘special deals’, ‘offers of the week’ and BOGOFs. In relation to POM-V products, pop ups such as ‘customers who bought ‘product X’ also bought ‘product Y’, is considered promotion and therefore advertising.

Visiting a website must not result in POMs being advertised to the general public for example by popping up in their email account or on search engines e.g. through the use of ‘cookies’.

There must be no human medicines, ‘specials’, products imported under the Special Imports Scheme or other unauthorised veterinary medicines advertised.

There must be no claims or reference to other species/treatments etc made which are not in a product’s Summary of Product Characteristics (SPC).

**Unauthorised medicinal claims**

Retailers should ensure that the descriptions of non-medicinal products offered for sale do not make medicinal claims. Medicinal claims can be both direct or implied i.e. if it gives the averagely well informed person the impression that the product treats or prevents disease, or if they gain that impression, it is considered to be ‘medicinal by presentation’ (see below). Remember that medicinal claims may also be made via leaflets, references to studies, customer testimonials and the product labels themselves.

Appendix 2 provides a list of commonly used terms that cannot be used for products that do not have a marketing authorisation. Further guidance on this and the UK controls of veterinary medicines can also be found on the VMD website at: [https://www.gov.uk/guidance/legal-controls-on-veterinary-medicines](https://www.gov.uk/guidance/legal-controls-on-veterinary-medicines)

Definition of ‘medicinal by presentation’: ‘any substance or combination of substances presented as having properties for treating or preventing disease in animals’.

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Definition of ‘medicinal by function’: ‘anything used or administered to animals with a view to restoring, correcting or modifying physiological functions by exerting a pharmacological, immunological or metabolic action or making a medicinal diagnosis’.

**Product Listings**

Products classified as POM-V must have that classification shown. POM-VPS and NFA-VPS should have those classifications shown.

For POM-V products there must be a statement that a veterinary prescription is required (or words to that effect).

For medicinal sheep dips there should be reference to the requirement for the purchaser and user to provide a Certificate of Competence number.

For Flubenvet premixture there should be reference to the fact that it is a medicated premixture manufactured from Flubenvet 5% (POM-VPS) and not a medicinal product *per se*.

Further information about Flubenvet is in Appendix 1.

There should be a link from each product to its SPC on the VMD’s Product Information Database (PID), or a link to the PID’s search page. Otherwise a reference to the PID in each product description and where it can be found on the retailer’s website.

If there is a link to a datasheet/information other than the product’s SPC then, because such datasheets/information can quickly be out of date, it’s suggested that a note is added to the product to say that “to be certain of the most up to date information, customers should check the SPC on the VMD’s Product Information Database” (or words to that effect) and provide a link to the search page or to a page on their own website which has the link. To directly link to an SPC, select the product, click on the little triangle which brings up the text ‘Click to View SPC’ then right click on that text and ‘copy shortcut’ to your website.

**Information Required**

Sufficient information must be obtained from a customer to enable the RQP to prescribe the most appropriate POM-VPS product or supply the most appropriate NFA-VPS product, and give advice on safe administration, warnings and contraindications.

**Customer’s details**

- the customer’s home address (for delivery)
- contact phone number and email address (in case of a query)
- if a returning customer, question about whether their or their animals details have changed [if they have – they should be required to update those details]
Questions about the customer's animal(s)
Details to be entered on drop down/tick boxes on the website or the information captured another way e.g. by an RQP contacting the customer by phone/email (if the latter, clearly explained on the website).

The following are examples of questions that should be asked:

For pets/companion animals:
- species
- breed
- weight
- age
- is the animal healthy
- is the animal pregnant or lactating
- is the animal on any other medication [if so, they should be required to provide details]
- have you used this product before on this animal [if so, confirm that the animal did not have an adverse reaction to this product]
- Do you require additional information on how to use the product [so an RQP can contact them]
- Confirm customer has read the Summary of Product Characteristics (SPC) for this product [with a link to the VMD’s Product Information Database]
- Confirm that the customer will use the product in accordance with its SPC (authorisation) and it will not be resold

For food producing animals:
- as above but with the weight of heaviest animal (to minimise the risk of under-dosing)
- the CPH number where the animals are kept
- overview of the farm (e.g. production systems, animal health plans, appropriate equipment available to use the product e.g. cattle crush, plunge dip)

For individual horses:
As above plus
- whether the horse is signed out of the food chain
- the worming programme used or animal health plan

For stables/livery yards
As above plus
- number of horses
- individual details ie breeds, ages, weights etc
- where the stables are (name and address)
- person responsible (owner/keeper of stables/livery)
- confirmation that all horse owners are allowing their horses to be wormed collectively.
- If any animals are pregnant/lactating
- other medications used
- product used before
- worming programme used
**At Checkout**

The customer should be asked to confirm that:
- the medicines are for use on the customer’s own animals and won’t be resold
- the medicines will be used according to the product’s authorisation [with a link to the Product Information Database]
- the customer has used the product before/knows how to use the product or would like the RQP to contact them to advise them how to use the product.

**Questionnaire after checkout**

If the questionnaire is completed after checkout, there should be an explanatory note to customers immediately prior to them confirming their order; for example:

‘When purchasing veterinary medicines classified as POM-VPS and NFA-VPS you will be required to complete a questionnaire after checkout. Veterinary medicines will not be despatched unless the questionnaire is properly completed. Our vet/pharmacist/SQP will contact you if they have any queries regarding the appropriateness of the medicine for your animal. Payment for the medicines will not be taken until the questionnaire has been assessed and the supply authorised by our pharmacist’.

**Prescriptions**

If the retailer has a downloadable prescription, it must comply with the requirements of the Veterinary Medicines Regulations (VMR). Checks must be carried out on the bona-fides of all prescriptions, but especially those without specific veterinary practice headings, including the retailer’s own downloadable prescriptions. Ideally, only prescriptions with a practice stamp or other authentication should be accepted. The prescriber should be contacted if there is any doubt about the authenticity of the prescription.

Retailers should include on their websites a statement to the effect ‘that it is an offence for a person to submit a fraudulent prescription to obtain veterinary medicines and for a person to alter a prescription unless authorised to do so by the prescriber. Any suspected cases of fraud or unlawful alteration of a prescription will be referred to the VMD.’

**Standard Operating Procedures**

SOPs should be dated and signed.

SOPs should detail:
- how an order is placed by a customer,
- what information is captured (online or email/phone back questionnaire ) and how the RQP assesses that information
- how customers are advised of the suitability of VMPs for administration to food producing horses
- how the RQP checks that the customer is competent to use the product
• how the RQP authorises the supply
• how the RQP advises on the safe administration of the product and any warnings or contra-indications, including the suitability for use in food-producing horses
• how the correct product is picked, packed and despatched
• the procedure for checking the authenticity of written prescriptions and what happens if there’s a query (are hard copies requested)
• the procedure for dealing with repeat prescriptions
• how ‘critical events’ such as supply of incorrect product or receipt of a fraudulent prescription (notify the VMD), are logged
• how/what special attention is given to products with the potential for abuse
• what records of supply are kept and their retention period
• how the integrity of products is maintained during transport
• that delivery agents/staff aware of any special handling and storage arrangements for products being delivered
• whether or not recorded delivery is used
• the procedure for dealing with returned medicines (if permitted)
• A ‘critical incident’ log should be kept
• A documented example of a retail supply. The example (using screenshots) should clearly demonstrate the documented procedures.
Appendix 1 – Flubenvet.

Flubenvet 240g and 60g pots are not POM-VPS medicines per se, but rather medicated premixtures (POM-VPS medicines mixed with other feed materials). Schedule 5 of the Veterinary Medicines Regulations restricts the supply of medicated premixtures to the manufacturer of the product or a Category 8 Distributor of medicated feeds/premixtures. They may only supply such medicated premixtures to another Category 8 Distributor or an approved manufacturer of final medicated feeds. If the supply is to an approved manufacturer of final medicated feeds for feeding to his/her own livestock (i.e. an on-farm mixer) then the supply of the premixture must be in accordance with a medicated feedingstuff prescription (MFSp) issued by a vet, pharmacist or appropriately qualified SQP.

In the case of final medicated feed containing Flubenvet (i.e. ready to use, without further mixing), only the manufacturer of the product or a Category 8 Distributor can supply it. They may only supply the medicated feed to another Category 8 Distributor, or the end-user (i.e. a poultry farmer). In the case of supply to the end-user, the supply must be in accordance with a medicated feedingstuff prescription (MFSp) issued by a vet, pharmacist or appropriately qualified SQP.

However, there is an exemption under Schedule 5 of the Regulations which permits a veterinary surgeon, pharmacist or appropriately qualified SQP to sell a medicated premixture or final medicated feed, from registered/approved premises, provided that:

(i) the vet, pharmacist or SQP treats the premixture/medicated feed as if it was a POM-VPS medicines – i.e. POM-VPS storage, prescribing, supply and record-keeping requirements apply; and

(ii) the premixture/medicated feed is only supplied to domestic keepers of poultry i.e. a person who keeps poultry on domestic premises, for feeding on those premises, non-food producing birds, or birds kept purely for private domestic consumption.

If meat or eggs are sold by the poultry keeper, even farm gate sales, then the exemption does not apply, and the user of the premixture must be an approved manufacturer of medicated feedingstuffs (this includes gamekeepers and shoots and particular attention is needed when selling the 240g pot).

It is recommended that retailers supplying Flubenvet under the exemption have a questionnaire to confirm that the customer only keeps poultry on domestic premises, for feeding on those premises - non-food producing birds, or birds kept purely for private domestic consumption and that they do not sell meat or eggs from their birds (or words to that effect).
Appendix 2 - Commonly noted unauthorised terms

The words 'increasing', 'improving', 'boosting', 'boosts', when used with reference to oxygen levels, stamina, performance and health, indicates that the product has a modifying effect and is acting as a performance enhancer. They are therefore 'medicinal by presentation'. NB 'maintains' or 'supports' health is acceptable.

The word 'bute' is a common abbreviation of Phenylbutazone which is a medicine. Products can be called e.g. ‘No Bute’, ‘Zero-bute’, ‘Buteless’ and ‘Bute-free’ provided that it is clearly stated on the product label and any advertising that the product does not contain Phenylbutazone.

The word 'anti-inflammatory' is considered to be medicinal by presentation, including in comparative terms e.g. ‘devils claw is considered to have the same anti-inflammatory properties as phenylbutazone’ and ‘MSM is believed to have anti-inflammatory properties’.

The words ‘relief’, ‘relieves’, protect’ and ‘protection’ are medicinal by presentation when used with reference to an illness or condition e.g. arthritis, rheumatism, cracked or brittle hooves.

Other commonly noted words considered medicinal by presentation include:

'treatment'
‘antacid’
‘antibodies’
‘immunoglobulins’
‘immuno-stimulator’
‘dose’ and ‘dosage’
‘wormer’

Wintergreen is considered the same as Methyl Salicylate, therefore medicinal by function if included at more than 0.25% w/w.

Further guidance can be found at:
Appendix 3 – About Veterinary Medicines page

This annex should be tailored for individual websites to reflect the classification of medicines supplied and the qualifications of the RQP.

About Veterinary Medicines

Buying authorised veterinary medicines

As a pet owner/horse owner/farmer, you'll want to be sure that the medicines you're giving your pet/horse/livestock are safe, effective and legal. Buying your veterinary medicines from us, a VMD-accredited internet retailer, you can be sure that:

- we are a UK-based retailer and authorised to sell veterinary medicines
- we only supply veterinary medicines that are authorised in the UK, meaning they're proven to be safe and effective when used as directed.

About Us (Note: if this information is already contained in an ‘about us’ section elsewhere on the site you may wish to include a link to it here instead of explaining it all again)

We are registered as a Veterinary Practice Premises with the Royal College of Veterinary Surgeons (RCVS). Our premises reference number is: XXXXXX. You can verify our registration by contacting the RCVS directly. See http://findavet.rcvs.org.uk/about-us/contact-us/ for details.

or

We are approved by the Veterinary Medicines Directorate (VMD) for the retail supply of POM-VPS and NFA-VPS veterinary medicines by a suitably qualified person (SQP). Our premises approval number is: XXXXXX. You can check our approval on the VMD’s website (http://www.vmd.defra.gov.uk/registers/approved-premises.aspx) or by contacting the VMD directly.

or

We are registered as a pharmacy with the General Pharmaceutical Council (GPhC). Our premises reference number is: XXXXX. You can check our approval on the GPhC’s website (http://www.pharmacyregulation.org/registers) or by contacting the GPhC directly.

Registered Qualified Person

Our registered qualified person with responsibility for the supply of veterinary medicines classified as POM-V/ POM-VPS/ NFA-VPS is Name / qualification. You can verify that [name] is a veterinary surgeon/pharmacist/SQP by checking the RCVS’s register (http://findavet.rcvs.org.uk/check-the-registers/) /GPhC’s register (http://www.pharmacyregulation.org/registers) /AMTRA’s list of SQPs (http://www.vmd.defra.gov.uk/registers/sqpregister.aspx)

For more details about SQPs, click here: http://www.amtra.org.uk/sqp.html
Our registered business address

The owner of the business is XXXX:

Address line 1
Address line 2
Address line 3
Tel:
Email:

Company No. VAT No.

The Veterinary Medicines Directorate (VMD):

The VMD is the UK government agency responsible for the controls on veterinary medicines in the UK, including their authorisation, manufacture and supply.

The Accredited Internet Retailer Scheme (AIRS)

In 2012 the VMD set up the Accredited Internet Retailer Scheme (AIRS) in response to the public’s concerns about buying veterinary medicines online. We are accredited under the Scheme.

You can learn more about the work of the VMD and AIRS by going to the following link: [http://www.vmd.defra.gov.uk/giao/public.aspx](http://www.vmd.defra.gov.uk/giao/public.aspx)

Authorisation and classification of veterinary medicines:

Any product in the UK that makes a veterinary medicinal claim must be authorised. You can tell if a veterinary medicine is authorised as it will include English language labelling that it’s important that you read and understand. The label will include a unique UK marketing authorisation number, which will appear in one of the following formats:

- Vm 04321/4001
- Vh 05467/4007
- EU/1/99/099/001-001

Alternatively, the product may include a statement "This veterinary medicine is marketed in accordance with Schedule 6 of the Veterinary Medicines Regulations - Exemptions for small pet animals" or similar on the label and packaging.
There are four classifications of authorised veterinary medicines:

1. Prescription-only Medicine – Veterinarian (abbreviated to POM-V)

2. Prescription-only Medicine – Veterinarian, Pharmacist, Suitably Qualified Person (SQP) (abbreviated to POM-VPS)

3. Non-Food Animal – Veterinarian, Pharmacist, Suitably Qualified Person (SQP) (abbreviated to NFA-VPS)

4. Authorised Veterinary Medicine – General Sales List (abbreviated to AVM-GSL)

You can use the VMD’s Product Information Database to check if a product is authorised and its classification, or to search for a UK-authorised veterinary medicine. The search facility allows you to search by trade name, active substance, species, legal classification and many other options. Each product has a Summary of Product Characteristics (SPCs) that tells you all about the medicine.

For more information visit the VMD’s Product Information Database here: http://www.vmd.defra.gov.uk/ProductInformationDatabase/

**Prescription misuse**

It is an offence to:

1. Alter a prescription issued by a vet, pharmacist or SQP e.g.
   - change the date the prescription was signed
   - change the quantity of the product
   - include additional medicines

2. Fraudulently produce a prescription e.g.
   - forge a prescription
   - forge the signature of a vet, pharmacist or SQP
   - send the same prescription to multiple retailers

Our RQP carefully checks all prescriptions and will report suspected prescription misuse to the VMD or the police.

**What to do if your pet suffers an adverse reaction:**

No medicine is risk free and all medicines have the potential to cause adverse effects. Some of the adverse effects are known about and these are explained in the product’s SPC. Others that may only rarely occur or are specific for certain breeds or groups of animals may only be seen when the products are used more widely.
If you suspect that you or your animal has had an adverse reaction to a veterinary medicine, or you think the medicine hasn’t worked as it should have done, report it to the VMD using the form available via the link below:
https://www.vmd.defra.gov.uk/adversereactionreporting/

Complaints about veterinary medicines:

If you have a complaint about the quality of a veterinary medicine please contact us in the first instance. You can find our complaints policy in our Terms & Conditions [add your link]. However, if you feel that we haven’t resolved your complaint satisfactorily, you can contact the VMD: postmaster@vmd.defra.gsi.gov.uk

Please note that the VMD will only consider complaints about veterinary medicines, not about service, delivery or cost and not about non-medicinal products.