ASSURING THE SAFETY, QUALITY & EFFICACY
OF VETERINARY MEDICINES

ATI 290

Request

From: [Redacted under section 40 of the FOIA]
Sent: 4 March 2014
Subject: Freedom of Information Act (2000) Requests

I would like to make the following further - individual - Freedom of Information Act (2000) requests relating to this matter:

1, How many instances of irregularities / errors or poor procedures (as outlined in the VMD Best Practice Note – Medicated Feedingstuffs Prescriptions (MFSp) Best Practice) relating to the supply of medicated feedstuffs to farmers is the VMD aware of between March 2004 and the present day?

2, How many instances of irregularities / errors or poor procedures (as outlined in the VMD Best Practice Note – Medicated Feedingstuffs Prescriptions (MFSp) Best Practice) relating to the supply of medicated feedstuffs to farmers is the VMD aware of between 2007 and 2012?

3, How many of these reports / instances were brought to the VMD's attention via inspections of feed mills or other relevant locations by VMD inspectors?

4, What the specific contents of those reports made by VMD inspectors were - including the date of each report, the nature of the irregularities / errors or poor procedures, and what remedial action was subsequently advised / acted upon?

VMD Reply

Sent: 28 March 2014
To: [Redacted under section 40 of the FOIA]
Subject: Freedom of Information Act (2000) Requests

Your Request

Thank you for your email dated 4 March 2014.

We dealt with your request under the Freedom of Information Act 2000.

You asked:

1, How many instances of irregularities / errors or poor procedures (as outlined in the VMD Best Practice Note – Medicated Feedingstuffs Prescriptions (MFSp) Best Practice) relating to the supply of medicated feedstuffs to farmers is the VMD aware of between March 2004 and the present day?

2, How many instances of irregularities / errors or poor procedures (as outlined in the VMD Best Practice Note – Medicated Feedingstuffs Prescriptions (MFSp) Best Practice) relating to the supply of medicated feedstuffs to farmers is the VMD aware of between 2007 and 2012?

3, How many of these reports / instances were brought to the VMD's attention via inspections of feed mills or other relevant locations by VMD inspectors?

4, What the specific contents of those reports made by VMD inspectors were - including the date of each report, the nature of the irregularities / errors or poor procedures, and what remedial action was subsequently advised / acted upon?

Our Reply

Background

Before we answer your individual questions I want to describe the chain of events that resulted in the MFS Prescription Best Practice documents and the VMD Management of MFS Prescriptions Workshop. The first point I want to make is that the VMD was alerted to problems in the management of MFSp by phone calls and some written correspondence, either from a vet or from a mill that was unhappy about the procedures used by the other.

Secondly, the VMD inspectors do not report observations on individual inspections to the VMD's Policy Team that deals with the related legislation. Whenever such calls and correspondence has prompted the Policy Team to investigate the management of MFS prescriptions, it has asked inspectors such questions as: "have you noticed an improvement in practices since the issue of the Good Practice Note" or "can you tell us what irregularities you most commonly see?" The Policy Team has then described these irregularities in the Good Practice Note.

In addition, an inspector will only have entered a non-compliance in their inspection reports where they observed a breach of the Veterinary Medicines Regulations (VMR); they would not have reported a non-compliance for failing to observe the Good Practice Guide.

Summary

To summarise, we were made aware that the sequence of vets prescribing medicated feed and issuing a medicated feedingstuff prescription (MFSp) to feed mills was not as expected i.e. vets visiting farms, prescribing the medicated feed by way of sending an MFSp to the mill. However, the sequence was not specified in the EU legislation that was transposed into the VMR, and as such there were no actual offences taking place. Nevertheless we did think it necessary to produce the two Good Practice Notes, and the advice in them was repeated by the Agricultural Industries Confederation to their members.

Since the publication of the Good Practice Note in 2012, in recognition of challenges which are preventing best practice as reported to us by the various stakeholders, we held a workshop to draw together an action plan for all to sign up to, in order to improve the management of medicated feedingstuffs prescriptions.

Specific numbers in answer to your questions above

1: 32 written irregularities/errors or poor procedures. We do not have a note of telephone reports. The number of irregularities etc. does not relate to the number of reports. If one report listed 5 irregularities etc., we have counted one report as 5.

2: 29 irregularities/errors or poor procedures. None listed in 2004/2005, 3 in 2006.

3: Failure to comply with the good practice guides are not breaches of the VMR and as such were not recorded on the inspection reports.

4(a) Please see Q3 - the details were not included in inspection reports. The remedial action carried out was to publish the good practice guides and to hold an industry workshop.

4(b): The Agricultural Industries Confederation (AIC) circulated two briefs to their Members in 2009 and 2012. AIC also carried out a survey of their members over a 3 month period from 1 Sept 2006 - 30 November 2006 to establish the areas where prescriptions were not being completed correctly.

The VMD issued 2 Best Practice Notes in 2007 and 2012. We held several meetings with the AIC and we organised the Management of MFS prescriptions workshop in December 2013 in order to draw together an action plan for all to sign up to, in order to improve the management of medicated feedingstuffs prescriptions.

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Our Service

If you are unhappy with the service you have received in relation to your request and wish to make a complaint, you may request an internal review within two calendar months of the date of this e-mail. If you would like to request an internal review please write to [Redacted under section 40 of the FOIA] at the VMD via ati@vmd.defra.gsi.gov.uk. If you are not content with the outcome of the internal review you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office
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