

AIRS REVIEW 2016 - Feedback from stakeholders

Proposed Changes	Comments
<p>Modify the AIRS application process so that the VMD doesn't assess non-medicinal products for medicinal claims. Instead, on the application form include:</p> <ul style="list-style-type: none"> (i) a declaration from the applicant that their website does not make medicinal claims for non-medicinal products; and (ii) an undertaking from the applicant that they will promptly correct all non-compliances brought to their attention by us and that they understand that failure to do so may result in their accreditation being suspended or revoked. 	<p>This is a good proposal, however it may not deter bad practice by some retailers. The problem we have as an internet retailer is that we often use the copy supplied by the manufacturer, and they are the ones that we have found are making medicinal claims – I think the VMD should look at penalising the manufacturers (which I'm sure you do).</p> <p>VMD comment: <i>Our enforcement team contact manufacturers when these issues are identified and work with them to bring documentation, labelling and associated advertising material into line with the regulations. If you are selling products which are making medicinal claims, it may be worth contacting your supplier again to make sure your product literature is up to date. It's possible that the problem has already been addressed.</i></p> <p>A declaration from the applicant especially by a pharmacist bound by the Royal Pharmaceutical Society & or the General Pharmaceutical Council Code of Conduct, Ethics & Performance section 6 – to 'Be honest and trustworthy'; or any other applicant bound by their professional code and ethics should give the VMD a greater level of assurance in such a declaration.</p> <p>We believe that not assessing non-medicinal products for claims is a negative step. This is an ongoing issue that requires ongoing attention. There are also anecdotal reports of counterfeits being an issue for non-medicinal products. If the VMD believe they cannot continue to assess non-medicinal products, perhaps the inclusion of a requirement for applicants to declare they have read VMD guidance on the words and phrases that should not be used for unauthorised products would be appropriate, even</p>

	<p>though misinterpretation of the guidelines could mean problems may still arise. If the VMD promoted the scheme more effectively to the public, internet retailers may attach greater value to the accreditation and be willing to pay for it, which in turn, may allow the VMD to carry out a more thorough assessment of the material.</p> <p>VMD comment: <i>The declaration made by the applicant in their application will make their obligations and commitments in this area clear.</i></p>
<p>To accredit the website only for the retail supply of authorised veterinary medicines classified POM-V, POM-VPS and NFA-VPS.</p>	<p>This is a good idea, however there should be a much more “standardised” rules on what information is required to order POM-V, POM-VPS and NFA-VPS medicines.</p> <p>VMD comment: <i>We will review and where appropriate revise the guidance we provide to applicants.</i></p> <p>The VMD’s remit should perhaps be limited to assessing only POM-V, POM-VPS and NFA-VPS categories, giving a clear indication that this is all that has been assessed.</p> <p>VMD comment: <i>The new logo will show what categories of medicines the retailer has been accredited to supply.</i></p> <p>We should prefer AVM-GSL products to be included.</p> <p>VMD comment: <i>See below</i></p> <p>While there are no legal restrictions on the retail supply of AVM GSL</p>

	<p>medicines, a responsible approach is still expected. Therefore, the exclusion of AVM GSL medicines from the list of what class of products they can sell could be misinterpreted to be a denigration of their medicinal status as fully authorised medicines.</p> <p>VMD comment: <i>There are no controls on the retail supply of AVM-GSL medicines. Consequently, there are no procedures or controls which the internet retailer must have in place for the VMD to assess. Internet retailers can explain in their 'About Veterinary Medicines' sections that AVM-GSL are authorised medicines.</i></p>
<p>Revise the wording of the 'strapline' that appears when a mouse pointer hovers over an accredited retailer's logo, so that it:</p> <ul style="list-style-type: none"> (i) Shows the classifications of the medicines that the retailer is accredited to supply. (ii) States that non-medicinal products haven't been assessed. (iii) Asks the customer to report anything they see wrong with the website to the VMD. 	<p>There is a problem at present that many veterinary prescription forms now advise clients to use only VMD-accredited web sites not all of which can lawfully dispense POM-V products. This causes confusion particularly as legitimate veterinary practices and pharmacies may not be accredited. We are not sure that the revised procedure would resolve this issue unless there was a simple explanation of what the classifications mean. This would greatly reduce the AIRS application processing time and would immediately indicate the classifications of veterinary medicines the retailer is accredited to supply.</p> <p>VMD comment: <i>Guidance on the categories of veterinary medicines will be available via clicking on the revised logo. The logo will also make it clear which categories the retailer is accredited to supply.</i></p> <p>There is a widespread lack of awareness among consumers about the AIRS</p>

	<p>scheme. Any efforts that could be made to improve this would be welcome. Members of the public would be unlikely to recognise anything that was wrong with the website, so most of the policing would be need to be done by veterinary pharmaceutical companies.</p> <p>VMD comment: <i>We will continue to raise the public's awareness of AIRS, for example through taking our publicity stand to shows and exhibitions. We also welcome individual companies and trade organisations publicising the Scheme and will provide them with advice and support, if requested.</i></p>
<p>Update the List of Accredited Retailers published on GOV.UK, to show the legal classification(s) of the veterinary medicines the retailer has been accredited to supply.</p>	<p>A simple explanation of the meaning of the classifications would also be required.</p> <p>VMD comment: <i>Guidance on the categories of veterinary medicines will be available via the revised logo.</i></p> <p>When someone clicks on the accredited logo the type of premises the retailer is supplying from, SQP, RCVS, GPhC etc should also be shown.</p> <p>VMD comment: <i>This information should be available on the retailer's website but we will further consider the suggestion.</i></p>

<p>Substitute a blank text box to for the AIRS logo on the website of a retailer that has lost accreditation (which may be a voluntary action or imposed by us) but has not removed the logo. [We would also take steps to ensure that ultimately the retailer removed the logo altogether].</p>	<p>Many retailers don't currently seem to promote their accreditation – the VMD logo is usually small and at the bottom of the homepage. If it was replaced by a blank text box, it is unlikely that anyone would notice. It all comes back to taking steps to raise the profile of the scheme with the public and making accreditation something that internet retailers really want to have and make use of in their marketing.</p> <p>VMD comment: <i>We do encourage AIRS members to promote their accreditation but ultimately this is a decision for each company. As previously stated, we will continue to raise the public's awareness of AIRS.</i></p>
<p>Other comments</p>	<p>We still have issues here over hard copy POM-V prescriptions - we insist on having the hard copy or a fax from the Vet. We think that this prevents unauthorised multi use of scrips. However, we constantly suffer from loss of trade on this stance as our some competitors accept e-mails, scans faxes from owners etc. This could be a big source of unauthorised use. A simple change to say that the hard copy must be at the Internet dispensary (or bona fide fax from the practice) would solve it and level the playing field.</p> <p>VMD comment: <i>This would be beyond the requirements of the Veterinary Medicines Regulations, which AIRS is intended to reflect. It is the responsibility of the RQP to ensure the validity of prescriptions. Prescription misuse can be reported online to our Enforcement team.</i></p> <p>As an accredited retailer with yourselves we believe it would be much fairer for us as a retailer and better for the customer if all sites selling POM-V and POM-VPS products were accredited with your organisation. That way it would be a level playing field and all customers would be confident in the</p>

knowledge that when they bought on line it was from an approved source, rather than as it is at the moment with people such as Amazon able to direct customers to sites which are not approved, do not ask for prescriptions and allow the purchase of drugs from abroad. We believe that all sites should have to pay to be accredited. It should also help you to monitor all sites by their accreditation number. Anyone not displaying this number and your logo could be shut down immediately. Why should practices have to pay for a VMD inspection and internet sellers not, it seems neither fair nor sensible.

VMD comment:

Any move to make AIRS compulsory would require a change to Veterinary Medicines Regulations, which would be contrary to the government's deregulation agenda. In order to retail supply veterinary medicines on the internet, a retailer has to be a registered veterinary practice premises, retail pharmacy or approved SQP Retailer; all of which are regularly inspected under the Veterinary Medicines Regulations.

All accredited retailers should be asked to sign a document that says they will adhere to the "advertising and marketing" rules for each appropriate POM or NFA group of products. There are VMD accredited retailers currently advertising brand name wormers on Google which as I understand is against the rules. Non-compliant retailers or those who break the rules should be struck off.

VMD comment:

Applicants to the Scheme are required to declare that they have read and understand the rules on retailing and advertising veterinary medicines. Any that we find breaking the rules are dealt with according to our published Enforcement Strategy, which aims to 'advise, insist, enforce'. Ultimately, any formal action taken against an AIRS member will also result in their accreditation being suspended or withdrawn.