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AMTRA Response to Working Paper "Competition in the Supply of Veterinary Medicines"

We write further to our initial response of 30 July 2024, and in particular in response to the working paper published on 6 February 2025.

There are 6000 Suitably Qualified Persons (SQPs) on the AMTRA Register who are qualified and registered to supply companion-animal medicines. While some work within FOPs, the large majority work in pet stores, "country stores" and other retailer premises.

SQPs working away from FOPs can offer advice and medicines in competition with FOPs, but the supply of medicines is limited to those classified by the DEFRA Secretary of State (in practice the VMD) as NFA-VPS and AVM-GSL.

In principle, POM-VPS medicines are also available to companion-animal SQPs, but in practice hardly any companion-animal medicines are currently POM-VPS, though there is no legislative barrier to future such classification – active consideration of this option as an alternative to NFA-VPS classification should be implemented by VMD and marketing authorisation holders.

Medicines classified POM-VPS or NFA-VPS ("VPS medicines") are ones that are used to reduce or prevent effects of endemic diseases, particularly internal and external parasite control. They have been judged by VMD to need professional advice on their safe use, but that advice need not come from a veterinary surgeon. They do not require a veterinary diagnosis.

However, SQPs' ability to offer competition to FOPs in terms of supply of companion-animal medicines is constrained by the range of medicines currently classified POM-VPS, NFA-VPS or AVM-GSL.

The legal classification is normally determined by the VMD in accepting an application for a marketing authorisation, or variation thereof, from the medicines manufacturer or marketer.

As far as we are aware, the VMD has never chosen to use its legislative power under the Veterinary Medicines Regulations to make compulsory "downwards" variations to the distribution classification of any medicine, or to implement a "lower" classification than that sought by the applicant, and so the distribution classifications in practice remain in the hands of the pharmaceutical companies.

AMTRA is of the view that there could be greater competition in the marketplace with FOPs in the supply of companion-animal medicines were more medicines reclassified from POM-V to POM-VPS, NFA-VPS or AVM-GSL.

The classification should ensure safety (for the target animal, for humans, and for the environment) but where that can be achieved at a "lower" distribution classification, then the competition gains with wider access to medicines should be relevant. Where a veterinary diagnosis is needed, or where advice that can only be provided by a veterinary surgeon is required, then a POM-V classification is needed. But where those don't apply, other options are available that can enhance access and competition, and benefit animal welfare through that increased access and potentially lower prices.

Those best placed to make safety assessments on existing authorised medicines are the Marketing Authorisation Holder and the VMD, but it is not clear to AMTRA that all existing POM-V medicines, having demonstrated an extended period of safe use in the field, continue to justify a POM-V classification.

VMD should consider whether existing POM-V medicines could be safely reclassified as POM-VPS, NFA-VPS or AVM-GSL to increase competition and potentially improve animal welfare, as well as encouraging MAHs to include the option of POM-VPS in their considerations.