

[RESPONDENT]

Annex: Response to Consultation Questions of Remedies Working Paper Dated 01 May 2025

Remedy 7: Changes to how consumers are informed about and offered prescriptions

Question 40: *We would welcome views as to whether medicines administered by the vet should be excluded from mandatory prescriptions and, if so, how this should be framed.*

1. [RESPONDENT] notes that in the case of injections, this is an act of veterinary surgery, which is regulated by the Veterinary Surgeons Act 1966 and a mandatory written prescription may neither be appropriate or practical in such circumstances. Consideration should be given as to whether there are any specific storage conditions which the product is subject to, which a pet owner may not be able to replicate - a vet being requested to administer a product purchased elsewhere may have concerns about its storage and therefore whether it is safe to administer.
2. In addition to injectables there may be instances where it is appropriate that the first dose of an oral or topical treatment is administered at the FOP/by the veterinary surgeon, for example for legitimate demonstration purposes. It would seem unnecessarily complex to require a written prescription to do this. This is different to offering a written prescription should the pet owner choose to have the remainder of the treatment dispensed from a pharmacy.

Question 41: *Do these written prescription remedies present challenges that we have not considered? If so, how might they be best addressed?*

3. [RESPONDENT] considers that obtaining a written prescription in order to purchase from an alternative dispensary may, in some circumstances, have a significant impact on animal welfare if a pet has to wait for a medication delivery to arrive rather than it being dispensed at point of need. The urgency of the situation may, in reality, mean that there is little time for the pet owner to consider alternatives and to purchase elsewhere, and the pet owner may need to rely on what is available at the vet practice. This may be particularly relevant in acute circumstances, however any delay can also be significant in the case of some chronic medications, as it may be important for the animal to start treatment as soon as possible (e.g. anti-epileptic drugs, medications to treat endocrinopathies). In contrast, [RESPONDENT] notes that when treating a chronic condition, the vet may consider that there are a range of appropriate alternative treatments and the condition may allow for a more thoughtful deliberation and ongoing discussion about treatment options between the vet and the pet owner.
4. As noted in response to Question 40 above, [RESPONDENT] also considers that the demonstration of how to correctly administer a product should be considered as a particular challenge to a mandatory written prescription proposal.

Remedy 8: Transparency of medicine prices so pet owners can compare between FOPs and other suppliers

Question 44: *What price information should be communicated on a prescription form? Please explain your views.*

5. [RESPONDENT] considers that there is merit in a prescription form containing the information about the medication, strength, amount, frequency of administration, route, duration and the animal and species the treatment is for. Further, if Remedy 9 (generic prescribing) is implemented, the prescription form should only list the products with identical SPCs that may be used as alternatives (please see paragraph 11 of [RESPONDENT]'s main submission regarding the Remedies Working Paper (**Main Submission**)). [RESPONDENT] considers that pricing information may not be suitable to be included as it should form part of the consideration but not necessarily the primary focus. Furthermore, according to Schedule 4 of the VMRs, cost is not cited as a reason for prescribing under the cascade and it therefore seems contradictory to have this as a primary focus. Price transparency should be communicated and communicated well but outside the actual prescription.

Question 45: What should be included in what the vet tells the customer when giving them a prescription form? Please explain your views.

6. As is proposed in Options C, D and E of Remedy 7, when providing a prescription [RESPONDENT] considers it appropriate for vets to explain the cost of purchasing the medication from the FOP and to be clear on all the associated costs, including prescription fees and dispensing costs. Vets should also advise that the medication may be available online or from other dispensaries, and clearly explain any prescription charges (as noted at paragraph 21 of [RESPONDENT]'s Main Submission). Vets should also be able to explain any merits in immediate dispensing for both the pet from a welfare perspective but also for the pet owner, particularly if it enables a demonstration of how to effectively administer medication.

Remedy 9: Requirement for generic prescribing (with limited exceptions) to increase inter brand competition for medicine sales

Question 47: How could generic prescribing be delivered and what information would be needed on a prescription? Please explain your views.

7. As set out at paragraph 11 of [RESPONDENT]'s Main Submission, [RESPONDENT] considers that the definition of 'generic' is key and that in the context of prescriptions this should be limited to those products that have identical SPCs to the branded product.

Question 49: Are there any potential unintended consequences which we should consider? Please explain your views.

8. [RESPONDENT] refers to paragraph 9 of its Main Submission.