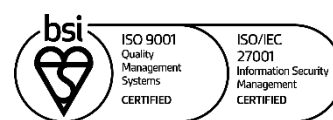




Veterinary Medicines Directorate

Promoting animal health and welfare by assuring
the safety, quality and efficacy of veterinary
medicines



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[Welsh Language Policy](#)
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VMD response to the CMAs draft substantive Order and Undertakings consultation into veterinary services for household pets in the UK

- [Draft substantive order](#)

2. Interpretation

‘Authorised Online Pharmacy’ means a retailer listed on the VMD Register of Online Retailers.

As we have explained in our previous responses, the term “online pharmacy” should be replaced with “online veterinary medicines retailer” or simply “online retailer”. Pharmacy is a protected term controlled by GPhC. Not all online veterinary medicines retailers are also registered pharmacies; therefore, this terminology may lead to confusion.

Parasiticide Price List

Veterinary medicines will only have one name, there is no difference between the full product name and the brand name, therefore the practice should only have to state the full product name.

‘Reference Product’ means the ‘reference veterinary medicinal product’ as defined in Section 2 and paragraph 10(1) of Schedule 1 of the VMRs, which is sometimes referred to as the originator product and describes the clinically equivalent medicine from which an Own Brand Medication is derived.

The majority of the own brand medicines aren’t generics of a reference product. They are usually the same product, in a different livery/branding, which has gone through an authorisation process. The terminology used here is likely to be confusing and will likely mean you will not capture most “Own Brand Medications”. We suggest you require vets to provide more general information on alternative products or alternative sources, such as online retailers.

‘VMRs’ means the Veterinary Medicines Regulations 2013 (SI 2013/2033).

We suggest you add (as amended) after the SI number, as this SI has been amended by several subsequent SIs. We also suggest you use VMR, rather than VMRs throughout this document, and any other documents where it is used.

‘Written Prescription’ means a formal physical or electronic document, issued by a Vet, which authorises a pharmacist, Vet or SQP to dispense specific medications. It must include certain information including dosage and instructions on how to administer the medication(s)

We do not have an explicit requirement in the VMR for administration instructions to be included on the written prescription. A vet who prescribes a veterinary medicine must be

satisfied that the person who will use the product is competent to do so safely and intends to use it for a purpose for which it is authorised. When prescribing, they must also advise on its safe administration and on any warnings or contra-indications on the label or package leaflet.

14.1(b) – online pharmacy should be replaced with online retailer.

15.1 (b)(ii) – both references to pharmacies should be replaced by retailers

17. The majority of the own brand medicines aren't generics of a reference product. They are usually the same product, in a different livery/branding, which has gone through an authorisation process. The terminology used here is likely to be confusing and will likely mean you will not capture most "Own Brand Medications". We suggest you require vets to provide more general information on alternative products or alternative sources, such as online retailers.

26. This appears to give RCVS powers of entry to vet practices, a power which they currently do not have. If this is the intention, then we believe a full industry consultation is required as this is a significant change to the current approach and enforcement powers currently granted to RCVS officers. Some vet practices are established in places of residence, such as ambulatory vets who visit other people's homes. There will be a significant concern and risk if the order was to grant such powers to a person's home to ensure these orders are being complied with. If this is not the intention, then this should be clarified. In the RCVS Monitoring Proposal, point 17 appears to suggest that the approach will be to check information, not practices. However, the wording here appears to suggest otherwise.

- [Draft schedule 2 - standard written prescription notice](#)

The reference to online pharmacies should be changed to online retailers. The wording is also unclear in that it suggests that information on these retailers is available on the RCVS website, when the information is held on the VMD's [Register of Online Retailers](#). The RCVS will also only hold information on vet practices that supply online and will not have information on SQP retailers and pharmacies who can also legally supply medicines online. Therefore, the pet owner will not have all the information on where to purchase medicines online.

- [Draft schedule 3 - standard flyer for ongoing medication](#)

The reference to online pharmacies should be changed to online retailers. The wording is also unclear in that it suggests that information on these retailers is available on the RCVS website, when the information is held on the VMD's [Register of Online Retailers](#). The RCVS will also only hold information on vet practices that supply online and will not have information on SQP retailers and pharmacies who can also legally supply medicines online. Therefore, the pet owner will not have all the information on where to purchase medicines online.

- [Draft explanatory note](#)

65.(a) – Veterinary medicines will only have one name, there is no difference between the full product name and the brand name, therefore the practice should only have to state the full product name.

140 and 141. All references to pharmacies should be replaced by retailers.

150. The majority of the own brand medicines aren't generics of a reference product. They are usually the same product, in a different livery/branding, which has gone through an authorisation process. The terminology used here is likely to be confusing and will likely mean you will not capture most "Own Brand Medications". We suggest you require vets to provide more general information on alternative products or alternative sources, such as online retailers.

- [Draft substantive undertakings](#)

2. Interpretation

POM-V' means 'Prescription-only Medicine – Veterinarian', which under the Veterinary Medicines Regulations 2013 may be sold to a Pet Owner only in accordance with a prescription from a Veterinary Surgeon for a Pet under the care of the Veterinary Surgeon.

We suggest you amend to add (as amended) after 2013.

'VMD Register of Online Retailers' means the register, hosted on the Veterinary Medicines Directorate website, of all online pharmacies which are authorised to sell POM-V medication.

Pharmacies should be replaced by retailers. It should also be amended to say "...all online retailers which are authorised to sell POM-V, POM-VPS and NFA-VPS medication."

6.1 (e) pharmacy should be replaced with retailer

- [RCVS monitoring proposal](#)

2. 2(c) Pharmacies should be replaced by retailers.

2. 8. The majority of the own brand medicines aren't generics of a reference product. They are usually the same product, in a different livery/branding, which has gone through an authorisation process. The terminology used here is likely to be confusing and will likely mean you will not capture most "Own Brand Medications". We suggest you require vets to provide more general information on alternative products or alternative sources, such as online retailers.

Proposed Approach

We have concerns that the wording may provide RCVS assessors with powers of entry to vet practices, which is not something that has been given to them previously and if this was being proposed then we would recommend that industry be fully consulted on such a change. Point 17 appears to suggest there will be monitoring of information, rather than practices. But it would be beneficial to clarify this point.

16. The VMD is responsible for inspecting premises that are not part of PSS, approximately a third of vet practices in GB. It appears to be a gap that the VMD is not included as a

potential source of information from their inspection programme and appears to unfairly target PSS premises. There may also be a small risk that premises disengage from PSS due to this inconsistency.

- [Annex A - RCVS monitoring flowchart](#)
- [Draft schedule 4 - complaint log](#)
- [Draft substantive order notice](#)
- [Draft schedule 1 - price list schedule](#)
- [Draft annex 1 - indicative price list](#)
- [Draft annex 2 - pet care plan information](#)
- [Draft substantive undertakings notice](#)

No comments on these documents