

ROYAL PHARMACEUTICAL SOCIETY

Review of the Veterinary Medicines Regulations 2013

Royal Pharmaceutical Society Response

Under the Veterinary Medicines Regulations (VMR) pharmacists are permitted to dispense veterinary prescriptions for POM-V medicines, to prescribe and supply POM-VPS medicines, to break bulk of all but sterile injectables and to carry out the extemporaneous preparation and supply of a homoeopathic remedy.

Whilst we will not be answering all the questions asked in this consultation, we would like to raise the following issues which impact on our profession.

General regulations: Advertising the Product

We are concerned that the proposals for restrictions on advertising are too severe and could even be damaging to adequate knowledge sharing and availability. If the restrictions were to be implemented this could prevent the display of veterinary products behind the counter in a pharmacy. We would want to encourage farmers and animal owners to consider “preventive medicines”, particularly vaccines for farm animals. If everything is hidden away and relies totally on conversations with customers then, in the busy environment of a store or pharmacy, such medicines (and the potential benefits they offer) will be missed or forgotten.

Classification and supply, wholesale dealers and sheep dip: Wholesale dealer’s authorisation

We welcome the proposal that *a pharmacist may supply a product mentioned in paragraph (6) for the purposes of the cascade without the requirement to hold a wholesale dealer’s authorisation.*

Classification and supply, wholesale dealers and sheep dip: Prescriptions

Where a veterinary medicinal product is supplied in accordance with an oral prescription the person who prescribes the product must make a record of the reason for prescribing the product.

We welcome this proposal as it prevents the supply of a medicine on the unreasonable or uninformed demand of the user of the medicine and protects the prescriber. This record must necessarily include the identity and quantity of the medicine (dictated by the number and weight of the animals) but needs also to include the reason for selection of the active.

There is also a need to identify the time available for this record to be created which may reasonably be twenty-four hours from the point of supply. Elsewhere in the regulations the term “as soon as is reasonably practicable” is used and this may also be appropriate here. The creation of this written (or digital) record may take more time than is practical at the pharmacy counter or is practically possible for the pharmacist or pharmacy support staff in the farmyard so the retrospective production of the record is necessary.

All prescriptions for veterinary medicines should be within the scope of this requirement. Supply via internet retailers, mail-order, email, or other routes that may not be considered oral should still have the requirement to record the reason for the issue of the prescription.

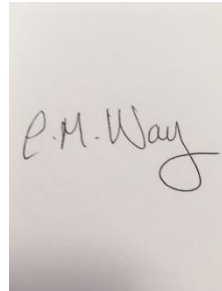
Consideration might be given to removal of the word oral or to some better way of ensuring that all routes of supply conform to this requirement.



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