# REVIEW OF VETERINARY MEDICINES LEGISLATION

**Introduction**

Veterinary Ireland, the representative organisation of the profession, has been invited to meet Department of Agriculture & Food officials on Thursday 19 February 2004 to review Department proposals on revisions to Veterinary Medicines Legislation, which were circulated on 16 February 2004.

We note that following this round of meetings with stakeholders that the Department will outline its proposals to the Animal Remedies Consultative Committee.

Veterinary Ireland has serious concerns about these proposals and has outlined these below – and has also presented alternative proposals where considered appropriate.

***(1) Department Proposal***

- Removal of the general requirement on veterinary practitioners to clinically examine animals before prescribing, thus according greater weight to professional judgement in relation to diagnosis and prescription. At the same time, it is intended to retain the requirement for a 'bona fide' relationship between practitioner and client as the context within which prescriptions will be issued;

***Veterinary Ireland Comments***

*Veterinary Ireland is wholly unhappy with this proposal. Nobody could conclude that removing the requirement for clinical examination accords greater weight to professional judgement. It might accord greater weight to judgement of the farmer but that's about all. This statement removes the link between diagnosis and treatment which is unjustifiable and possibly encourages inappropriate use of medicines which is in conflict with good veterinary practice to say nothing about consumer protection and minimising onset of increased resistance to antibiotics and anti-parasitics.*

Two divisions should be made for animal remedies supplied under prescription control:

- Class 1 POM would require the veterinarian to meet all of the criteria outlined in Regulation 45 taking into account Regulation 44 and other relevant regulations.
- Class 2 POM would require advice by the veterinarian without the need for meeting the requirements of Regulation 45 c(i) (i.e. without the need for immediate prior clinical examination) before the sale is completed. These Class 2 POM category medicines to be used within the next stated period in the animal health programme should be written and signed into the programme by the vet. The supply of such medicines could be completed either by the bona fide vet or by a pharmacist, from a pharmacy, on foot of the protocol agreed in the programme.

***(2) Department Proposal***

- A new requirement that veterinary practitioners must in all cases issue written prescriptions and if the practitioner supplies the medicine that he/she issues the client with an invoice for supplying the product which is distinct from the invoice in respect of the provision of professional services;

***Veterinary Ireland Comments***

*This is a workable way of providing a paper trail for all animal medicines for use in food-producing species. Under the current system, the animal remedies register is the most unused document on the farm except the herd register part of it. Whether or not this additional paper work is charged for, is a matter, which will probably be dealt with subsequently.*

***Veterinary Ireland Proposal***

*Full consideration should be given to this added element of bureaucracy as it could result in increased costs (such as an additional charge or a higher rate of VAT) for farmers.*

***(3) Department Proposal***

- Amendment of the 1996 Regulations to remove the exception for intramammaries from the general rules on antibiotics and also to decouple intramammaries from controls under Poisons legislation;

***Veterinary Ireland Comment***

*Veterinary Ireland foresees no difficulty with this as long as they are categorised as class 2 POM's and can only be supplied if there is an operational mastitis control programme on the farm as part of the Herd Health Management Programme.*

***Veterinary Ireland Proposal***

*Intramammaries to be treated as Class 2 POM's.*