

**Testimony to the Federal Trade Commission's Pet Medications Workshop  
Connecticut Veterinary Medical Association**

**October 2, 2012**

Mr./Madame Chairman, Members of the FTC and Guests,

Thank you for the opportunity to offer comments on the state of pet medication availability to consumers.

In veterinary medicine we define our professionalism through the Veterinarian's Oath, and by the veterinarian-client-patient (VCP) relationships we develop. Our Oath admonishes us to use our "scientific knowledge and skills for the benefit of society." That scientific knowledge is hard earned, and directly bears on our ability to serve our patients and clients. Further, the VCP relationships we develop define the framework in which we practice and clarifies exactly who we are sworn to serve. Indeed, this relationship is unique amongst medical practitioners. While it is the animal owning client who makes the decisions and pays the bills, it is the animal patient that either gets well or doesn't and that benefits or doesn't, from our ministrations. While our hearts lie primarily with the fate of our animal patients, we remain responsible to both. Relative to the dispensing of medications to our patients, the highest degree of professional oversight must therefore be exercised, both for the safety and health of our patients, as well as for the protection of our clients.

The current trend of pharmacists and pharmacies routinely dispensing and supplying veterinary medications to the public in a manner similar to that of human medications continues to develop. While there is a reasonable consumer choice aspect to this endeavor, as well as sufficient financial motivation on the part of retailers and consumers alike, due consideration for the safety and health of veterinary patients must not be lost in the rush to please consumers and accommodate retailers.

The lack of specific education and training in veterinary medicine and veterinary pharmacology on the part of the vast majority of practicing pharmacists is nearly ubiquitous, and ought to be seen as scandalous. To us, this implies a lack of pharmacist commitment to veterinary patients and a cynical effort to profit in the absence of that commitment. This cannot be allowed to continue.

The depth and breadth of the medical and pharmacologic knowledge about humans required of undergraduate pharmacy students is massive (see: <http://pharmacy.uconn.edu/academics/pharm-d/professional-curriculum/>) and stands in stark contrast with the complete lack of analogous training in veterinary medicine or comparative pharmacology, in the overwhelming number of pharmacy educational programs. There is a good reason pharmacists need to know so much about the human patients they are licensed to dispense for, lives are at stake, and pharmacists may be the last line of defense before a serious mistake is made, or in the worst case, may be the source of such a mistake. Such unwanted results are thus even more likely in veterinary patients than in human patients,, due to the lack of appropriate pharmacist education. Most veterinarians are personally aware of such mistakes, or near mistakes, with their own patients.

Dogs and cats are not simply small people, and the physiologic and pharmacologic differences between species should make obvious the need for adequate education to properly dispense for them. For example, products like Tylenol® are deadly poisons to cats and can never be used in that species; the human formulation of the antibiotic in Augmentin®, while similar to the veterinary product Clavamox® is not identical, and thus Augmentin® is much less effective for its desired purpose in animals. There are many other examples where *similar* is not safe, nor adequate. Despite this, many pharmacists that dispense for animals consider the keeping of a basic veterinary pharmacology

textbook on their shelf, adequate to meet their need for veterinary pharmacology education. We vehemently disagree, and instead assert that the need for appropriate pharmacist training is essential, self-evident, and urgent, especially as the current trend towards the dispensing and purchase of veterinary pharmaceuticals at human pharmacies accelerates.

Our profession strives to protect animal health above all other considerations, and in so doing we build and maintain the VCP relationships on which we rely for our livelihoods. As practiced today, the unrestricted dispensing of veterinary pharmaceuticals by untrained pharmacists risks animal health and defies consumer trust. The untrained pharmacist is inadequately prepared to participate in the VCP relationship, nor to work with veterinarians as professional equals, in furthering the interests of our patients and clients. The Connecticut Veterinary Medical Association believes if veterinarians are to work closely with pharmacists, as do physicians, pharmacists should be required to achieve and demonstrate professional competence at least equal to that which they exercise in dispensing for human patients. We owe our animal patients no less. Thank you.

Sincerely,

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