



Tennessee Veterinary Medical Association

September 14, 2012

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex X)
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Pet Medications Workshop - Project No. P12-1201

Dear Sir or Madam:

I am writing on behalf of the membership of the Tennessee Veterinary Medical Association (TVMA) representing the more than 1,000 veterinarians in the State of Tennessee. The following represents a summary of the feedback that the TVMA leadership has received from practicing veterinarians, academic veterinarians, and one veterinary/human pharmacist in the state concerning the Federal Trade Commission's (FTC) request for public comment in connection with a workshop to review issues surrounding consumer protection in the pet medications industry.

The TVMA opposes the "mandatory" prescription writing for pet medications. The overriding guiding principle in developing this position is the safety, health and well being of our patients. Secondly, we are concerned that mandatory prescription writing for pet medications is not in the best interest of the consumer and their need for quality health care for their animals. Society will not be well served by mandating a move away from the veterinarian playing a major role in the procurement of preventive health care products and medications.

Currently, veterinarians have at their discretion the ability to write prescriptions to outside pharmacies or to provide appropriate medications from their clinic or hospital directly to the client/patient. In Tennessee, veterinarians follow state laws and the American Veterinary Medical Association's (AVMA) Principles of Veterinary Medical Ethics.

The safety, health and well being of our patients would be jeopardized by mandatory prescription writing because:

Lack of Knowledge and Expertise

- At the present time, pharmacy schools do not teach about veterinary pharmacy.
- Pharmacists have no knowledge of veterinary pharmacology or the translation of the use of human drugs to animals.
- Pharmacists are not aware of the unique dosing requirements that animals have for human drugs.
- The lack of knowledge, expertise and experience in species-specific differences in our patients prevents the proper matching of drug dose, frequency, etc to the species and significantly increases the potential for adverse reactions.

- The lack of knowledge and experience significantly affects the success or failure of a treatment, or even the life or death of the patient.
- Human pharmacists do provide the extra label of protection to prescriptions for animals like they do for humans and therefore it is like providing an over-the-counter product.
- There is no guarantee of product safety and quality and therefore drugs and other products may be below FDA standards. This may endanger both animal and human health.
- Some medications that are used in animals are risky, dangerous and can have significant side effects and require special considerations during administration. Often there is no human drug equivalent. Veterinarians cannot support the release of these types of drugs/products unless they are under their direct control.

It is inadvisable for pharmacists that are untrained in and have no knowledge of veterinary medicine and animals to fill prescriptions for animals. This lack of knowledge has seriously endangered patients and has promoted the potential for the development of antibiotic resistance.

The best interest of the consumer would be jeopardized by mandatory prescription writing because:

- The consumer has no way to verify the safety and efficacy of medications received in this fashion.
- The provision of in-clinic prescriptions allows for verification of the source of the medication and multiple cross checking procedures that prevents accidents and mistakes.
- There is no guarantee of product safety and therefore the safety of the animal. This may endanger both animal and human health.

Allowing pharmacists to fill veterinary prescriptions with no training is a disservice to the consumer. The consumer has the right to deal with a trained professional in the species and the medication for which the prescription is written.

Mandatory prescription writing places an undue burden on the veterinarians and veterinary practice. In one instance, 10-20% of veterinary prescriptions written to an outside pharmacy required multiple contacts with the outside pharmacists for clarification of the written prescription because they think it was incorrectly written because of a lack of knowledge of drug use in animals.

Unlike human pharmacies and other retailers, veterinarians and veterinary practices have invested significant amounts of time and education to assure that drugs prescribed and supplied are appropriate and to be able to supply the owner with information on their use, tracking side effects, drug interactions, and species variations. Another burden that may occur for veterinarians includes the time to write prescriptions in every case and in some cases multiple prescriptions.

In summary, The Tennessee Veterinary Medical Association does not support mandatory prescription writing for pet medications because we feel that it will seriously jeopardize the health and welfare of our patients and that it would not be in the best interest of the consumer. The value of quality veterinary care is created by the fact that the "person with the most knowledge" (the veterinarian) is able to provide not only the medication or health care product but also provides the knowledge about species differences, potential side effects, dosage, and expected outcomes.

Respectfully submitted,

Dennis R. Geiser
President, Tennessee Veterinary Medical Association