



September 14, 2012

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

**Re: Pet Medications Workshop, Project No. P12-1201**

Dear Secretary:

The Washington State Veterinary Medical Association (WSVMA), representing nearly 1,400 veterinarians in various sectors of the profession, submits the following comments in advance of the October 2, 2012 workshop on pet medication issues.

The WSVMA is concerned that animal health will be negatively affected if H.R. 1406 Fairness to Pet Owners Act is passed. Our concerns are as follows:

- Veterinarians, through their advanced education and training are uniquely qualified to provide the best professional guidance and education to pet owners when dispensing prescription products for animal patients. Pharmacists are not trained in veterinary pharmacology and do not understand the complex physiological responses to drugs among varying species. Furthermore, pharmacists are only trained to manage one species, whereas veterinarians are trained to manage multiple species.
- Consumers have an expectation that the place where they purchase their pet's prescriptions come with knowledgeable staff trained in pharmacology for their pets. The WSVMA is aware of anecdotal evidence where retail pharmacists, applying their knowledge of human pharmacology to non-human species, have altered dosages or made substitutions without obtaining authorization from the veterinarian, resulting in harm to the animal.
- Veterinarians are uniquely qualified to advise pet owners on administering medication in difficult situations for a variety of species, which can require altering dosages or switching medications.

The WSVMA also has concerns that H.R. 1406 overreaches in its' attempt to regulate veterinary prescriptions:

- The WSVMA is supportive of a client's right to choose where a client has their prescription filled. However, H.R. 1406 is unnecessary when Washington laws and regulations already govern compliance by veterinarians.

- H.R. 1406 will cause unnecessary and costly burdens on veterinary practices, which are operated as small businesses. Requiring a written prescription be provided, regardless of whether or not the client is having the prescription filled by the veterinarian provides no benefit to the public. Furthermore, the provision requiring verification of prescriptions, regardless of whether the pharmacy is accredited or licensed, places the veterinarian in both a legal and ethical dilemma and it could put consumers at risk.

There is no comparison between H.R. 1406 and the Contact Lens Consumer Act. Contact lenses are a single commodity used to treat a limited number of conditions and are dispensed by those who have a familiarity with the product. There are multiple species and breeds combined with a multitude of medical conditions. Drugs used for animal treatment have numerous dosages, contraindications, side effects and interactions. Contrary to contact lens dispensing, the average pharmacist simply is not trained in veterinary medicine to properly advise pet owners when it comes to filling prescriptions.

The WSVMA believes that veterinarians are the most qualified to provide professional guidance when prescribing and dispensing pharmaceuticals to their animal patients. We believe there is no need for this legislation and are confident that the existing model protects both animals and their owners.

Sincerely,

Candace Joy  
Executive Vice President