

### Comments about Pet Medications and Consumer Protection

When evaluating these issues, please consider that it is difficult to draw accurate comparisons between human medicine and companion animal medicine. Since animals do not have the advantage of spoken language to communicate about their physical health, on-going healthcare needs and compliance, the veterinarian plays a more prominent role in helping a client better understand the needs of their pet. In other words, the patient cannot be its own advocate. The role of advocate falls to the veterinarian. This is one reason why a doctor/patient relationship is so important to the health and well being of the animal.

Some manufacturers choose to sell their products only to veterinarians because the efficacy of the Rx is dependent on proper dosage, proper administration of the dosage and monitoring of the patient after dosage. A direct understanding of the patient needs (doctor/patient relationship) and client education helps to mitigate risks like improper dosage, false dosage, drug intolerance or adverse reactions that need to be monitored carefully. Since the efficacy of the product and subsequent health of the animal are contingent on successful administration of the medication, veterinarians are the most qualified to counsel clients and help manage medications.

Regardless, the consumers have an array of choices when purchasing pet medications:

1. Consumers have a choice regarding which products to buy. There are numerous competing products.
2. Consumers have a choice regarding where they can buy these products:
  - a. There are numerous competing sales channels
    - i. Veterinarians
    - ii. Dedicated retail stores
      1. Big box retailers
      2. Pharmacies
      3. Pet Stores
    - iii. Online retailers
  - b. There are numerous resellers within each respective sales channel.

Yes, pet meds may be a \$7 Billion industry, but it is currently serviced by hundreds of thousands of retail outlets, online retail stores and veterinary clinics.

We practice in the state of Florida where the issue of providing prescriptions is already regulated. Florida Statute 474.2165 (3), states:

*“Any records owner licensed under this chapter who makes an examination of, or administers treatment or dispenses legend drugs to, any patient shall, upon request of the client or the client’s legal representative, furnish, in a timely manner, without delays for legal review, copies of all reports and records relating to such examination or treatment, including X rays. The furnishing of such report or copies shall not be conditioned upon payment of a fee for services rendered.”*

The actual statute can be viewed by clicking:

[http://www.leg.state.fl.us/Statutes/index.cfm?App\\_mode=Display\\_Statute&Search\\_String=&URL=0400-0499/0474/Sections/0474.2165.html](http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=0400-0499/0474/Sections/0474.2165.html)

As a small business owner, I believe pet medications are sufficiently regulated and the consumer has many choices when it comes to obtaining medications for their pets. No additional consumer protection measures are needed.

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