

Key take-away

Opinion of German veterinarians to the Proposal for a regulation of the European Parliament and of the Council on veterinary medicinal products

(COM(2014)0558 – C8-0164/2014 – 2014/0257(COD))

Referring to ENVI Report A8-0046/2016 Françoise Grossetête

1. A veterinary prescription shall only be issued by a veterinarian

Article 4, No. 24, definitions

Article 110 – paragraph 2

“Veterinary prescription” means from our point of view unambiguously any prescription for a medicinal product issued by a **veterinarian**. A veterinary prescription shall only be issued **by a veterinarian** and by no other person.

Justification:

Any prescription only medicine (POM) entails potential risks. It is therefore essential that these veterinary medicinal products are only prescribed by persons with the highest competence: Veterinarians. Veterinarians are a clear defined profession whose qualification is regulated by EU law. Prescription issued by a veterinarian is also necessary as prescription and treatment are preceded by examination and diagnosis which can only be done by a veterinarian. A prescription by another person can by no means be verified all over Europe.

(AM 74 +/-) (AM 147 +) (AM 235 +/-)

2. Medicinal products for human use are sometimes required from another member state

Article 115, 116

There is no legal possibility of transfer medicinal products within EU for human use in a treatment emergency for animals. This must be changed as scheduled in Amendment 247 i first sentence.

Justification:

Medicinal products are often not available. Current fatal problem: Fludrocortison; Astonin H[®] to treat Addison’s disease in dogs is not available in Germany. The problem could easily be solved by import.

(AM 247 1b i Clause 1 + Clause 2 -)

3. Approval by the veterinary authority is not feasible

Article 115, 116

The approval of a prescription of antimicrobial medicinal products for human use by the veterinary authority is neither feasible nor expedient. For the sake of animal welfare, the authority’s approval cannot be awaited in case an animal would actually need such medication. An immediate and appropriate treatment of animals would become impossible. Even if the authority worked 365 days around-the-clock, this procedure is neither practical nor compliant with animal welfare.

(AM 247 1b i Clause 2 -) (AM 249 1 ba i Clause 2 -) (AM 250 Clause 2-)

4. No internet sales for prescription only veterinary medicinal products (POMS)

Article 108

We appreciate that antimicrobials, psychotropic and biological/immunological veterinary medicinal products are supposed to be excluded from **internet sales** according to amendment 230. Moreover we are of the opinion that **all prescription only veterinary medicinal products** should be excluded from this kind of retail.

Justification:

In Germany it has been shown that restrictions on the online and mail order sales at national level, as provided for in Article 108 para. 7 of the Commission proposal, are neither to control nor to sanction cross-border and are therefore often ignored. Unapproved agents or falsifications, which can be dangerous or ineffective, are offered online according to experience in several Member States. This results in an increased risk to the health of humans and animals. It is incomprehensible why it should remain at the nationally different regulations, particularly as the Commission itself emphasizes simultaneously to a danger to public health. It is apparent, that a transnational control and punishment of nationwide restrictions is not possible. It cannot be guaranteed at present that internet pharmacies comply with the law in force. Therefore we highly support strict and harmonized conditions for internet providers of veterinary medicinal products.

(AM 230 +/-)

5. No Antibiotics over the counter

Article 120

Some active substances - particularly antibiotics - should be excluded from **over-the-counter medicines**, even when it concerns **pets** (like small rodents, rabbits or homing pigeons), namely those that are also used for food-producing animals. (★)

Legend:

Amendments support +

Amendment refusal -

Own proposal ★

Berlin, 10 October 2016

The Federal Chamber of Veterinarians is a working group comprising the 17 federal state/chambers of veterinarians in Germany. It represents the concerns of the approximately 40.000 veterinarians, practitioners, veterinary health officers, scientists and veterinarians in other professions vis-à-vis politics, administration and the public sector at national and EU level.