



**EU DOG & CAT
ALLIANCE**

Position on the Proposal for a Regulation on the manufacture, placing on Veterinary Medicinal Products

COM(2014) 558 final, 2014/0257 (COD)

1. About the EU Dog and Cat Alliance

The EU Dog and Cat Alliance represents over 50 organisations from across the European Union. This includes veterinary organisations, organisations which are involved in the rescue/rehoming of dogs and cats and organisations which are working to protect dog and/or welfare. The Alliance's main focus is on lobbying the EU to introduce and improve EU legislation in relation to dogs and cats.

2. Background

In September 2014, the European Commission adopted a proposal for a Regulation on Veterinary Medicinal Products, which aims in particular to make more medicines available in the EU to treat and prevent diseases in animals. The proposal from the Commission is available [here](#).

3. General position

The EU Dog and Cat Alliance has the following comments on the proposal for a Regulation on Veterinary Medicinal Products:

- The definition of 'veterinary medicinal product' should be expanded to clarify the various categories of Veterinary Medicinal Products available, to better define individuals that are able to supply and/or dispense veterinary medicinal products. This classification should be pan-European.
- The EU Dog & Cat Alliance welcomes the establishment of a Union database of veterinary medicinal products. However, for veterinarians to be able to comply with the 'cascade' system for prescribing medicinal products, it is important that they are able to find alternatives if certain products are unavailable. The product database should therefore have a search facility, allowing products to be searched by trade name, active substance, company, species or therapeutic intervention.
- To avoid disproportionate record keeping, detailed records should only be required to be kept for products which require a veterinary prescription.
- The online sale of veterinary medicinal products introduces certain risks. It is important that these are minimised by ensuring that appropriate checks on online retailers are undertaken across Member States. To minimise the risks of antimicrobial resistance, the online sale of antimicrobials should be prohibited.



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- The minimum requirements for a veterinary prescription should be extended to include the number of repeat prescriptions permitted. As veterinary medicinal products may have different trade names in different Member States, it is also important that the active substance is listed in the veterinary prescription.
- The EU Dog & Cat Alliance has concerns about the use of medicinal products for species or indications outside the terms of the marketing authorisation in non food producing species. The current wording gives the same weighting to medicinal products for human use as to veterinary medicinal products with indications for use outside those for which the medicine is required. The EU Dog & Cat Alliance believes that medicinal products for human use should only be considered when there are no authorised veterinary medicinal products available.

Due to these concerns, the EU Dog & Cat Alliance has drafted specific amendments to the proposal which we believe are necessary to protect the health and welfare of dogs and cats. For further information, please contact: info@dogandcatwelfare.eu