The Federation of Veterinarians of Europe, FVE, welcomed the proposal for a new European Union Regulation on veterinary medicinal products. However, it wishes to point out strongly that the text proposed with regard to the person making a veterinary prescription - “A veterinary prescription shall only be issued by a person qualified to do so in accordance with applicable national law” - is too vague. This could jeopardize the health and welfare of animals and the health of people.

The prescription is the decisive and critical step before using medicinal products. The prescription follows the examination of the animal(s), the evaluation of the conditions where under they live, and the diagnosis made. Prescriptions can only be made by the person under whose care the animals are.

Incorrect prescriptions go hand in hand with misuse and overuse of medicinal products, can endanger the health and welfare of animals and can enhance the occurrence and spread of resistance against antimicrobials and antiparasitic medicines. The quality of the prescription heavily relies upon the training, education and professional ethics of the prescriber. For this reason the prescriber shall be sufficiently educated, and be licensed by and accountable to the national regulatory or statutory body.

At this moment, 27 EU Member States allow only veterinarians to prescribe. In all 28 Member States only veterinarians can prescribe antibiotics, controlled drugs (e.g. sedatives) and other medicines with risk to animal and public health. Veterinarians are bound by their professional Code of Conduct. Failure to obey the Code of Conduct, including provisions on continuous professional education, leads to disciplinary actions and might result in the loss of veterinarian’s licence.

The vague wording in the legislative proposal leaves the door open for persons who are insufficiently trained and not regulated and licensed to make a prescription. This creates a risk for an increase in the misuse and overuse use of antimicrobials and consequently in the occurrence of antimicrobial resistance.

Additionally this Regulation has to be consistent with other pieces of EU legislation. The new Animal Health Law1, for which political agreement has been reached recently, clearly defines the role of the veterinarian in raising awareness of antimicrobial resistance and in advising animal owners with regards to prudent and responsible use of medicines. The obligatory animal health visits by a veterinarian are part of this strategy.

In conclusion, FVE calls for all legislators to take the responsibility to propose an explicit legislative framework by requiring that “A veterinary prescription shall only be issued by a veterinarian.”