



ASSURING THE SAFETY, QUALITY AND EFFICACY
OF VETERINARY MEDICINES

From the Chief Executive

Ref: 302617

BY EMAIL

Catherine O'Driscoll
Canine Health Concern
PO Box 7533
Rait
Perthshire
PH2 1AD

3 November 2010

Dear Ms O'Driscoll,

Thank you for your letter of 13 October and your e-mail of 14 October forwarding one you had received from Kim Moriarty.

As a dog owner myself I can sympathise with Ms Moriarty on the loss of her dog Bentley and offer my condolences. Having read her account of Bentley's symptoms, his illness was obviously serious but it is impossible to offer any other comment on likely causes without access to the pathological information and clinical signs. The diagnosis was leukaemia which is a disease of the white blood cells. Immune mediated haemolytic anaemia is a disease affecting the production of red blood cells. Although the veterinary surgeon's advice in this case may well be valid, the correct approach for Ms Moriarty would be to encourage her vet to report the case to the pharmacovigilance scheme and, if this is not possible, then to report the case herself. This can now be carried out on-line at www.vmd.gov.uk. This will capture all the relevant information, allow it to be assessed as a suspected adverse reaction and will add to the information database on medicines. Your own attempts at distance diagnosis are, I am sure, well intended but, on the basis of such limited evidence, is unwise. By way of illustration neither of us knows from the email sent to you from Ms Moriarty which vaccines the dog received.

Turning to your letter of 13 October, you asked me to tell you why redundant 1-year core MLV vaccines are on the market and when you can expect them to be withdrawn. You seem to accept in your letter that the VMD has no direct regulatory powers over the behaviours of a veterinary surgeon. It is, of course, the RCVS, not the VMD, who is responsible for a veterinary surgeon's conduct. However, you feel that the VMD can influence the veterinary profession because we are able to authorise or remove veterinary medicinal products (VMPs) from the market. Clearly, if a medicine is no longer authorised then a veterinary surgeon should not use it. However, your position ignores the fact that the VMD can only operate within the powers granted to it by legislation for authorising VMPs or, as you wish here, revoking such an authorisation.

Veterinary Medicines Directorate

Woodham Lane, New Haw, Addlestone, Surrey KT15 3LS
Telephone (01932) 336911 Fax (01932) 336618 Website: www.vmd.gov.uk
Director and Chief Executive **Steve Dean** BVet Med DVR MRCVS

The Veterinary Medicines Directorate is an Executive Agency of the Department for Environment, Food and Rural Affairs



INVESTOR IN PEOPLE

The relevant part of the Veterinary Medicines Regulations 2009 says "the Secretary of State must suspend a marketing authorisation on being satisfied that the risk:benefit balance is unfavourable". To determine the risks, an incident rate of suspected adverse reactions is derived from the data on the suspected adverse reaction system. We also consider the seriousness of reports and whether there is a direct link between use of the medicine and the adverse reaction reported. The current reporting on canine vaccines does not support your view that the benefit:risk balance is unfavourable and, therefore, no action is likely. You have in the past criticised the pharmacovigilance system and CHC has resisted advice to encourage members to report their suspected adverse reactions to the scheme. In my view this is flawed as the scheme offers the opportunity to provide the independent experts, forming the Veterinary Products Committee, access to the information that you rely upon to support the CHC views on over-vaccination.

In closing, I note you have not addressed my request that you justify your comments on the integrity and impartiality of the VMD staff and myself. Unless you are able to provide evidence that supports your previous allegations it will be assumed you are unable to do so and that your comments were made in an attempt to unjustifiably damage the reputation of the VMD staff and myself as part of your campaign.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S. Dean', written in a cursive style.

Professor Steve Dean
Chief Executive