

## **Guidelines for Ethical Marketing by Veterinary Pharmacists**

Veterinary pharmacists play a crucial role in ensuring the safe and effective use of medications for non-human species while respecting the collaborative relationship between veterinarians, pharmacists, and clients. To uphold the integrity of this relationship and maintain trust, veterinary pharmacists should adhere to the following ethical marketing guidelines:

### **1. Respect the Veterinarian-Client-Pharmacist Triad**

- The veterinarian-client-patient relationship (VCPR) is the foundation for interaction among veterinarians, their clients, and their patients, and is crucial to the health of animals.
- Acknowledge the veterinarian as the primary decision-maker in an animal's treatment plan.
- Avoid any marketing practices that bypass or undermine the veterinarian's authority or recommendations.
- Collaborate with veterinarians to ensure the best outcomes for non-human patients.

### **2. Transparency in Communication**

- Provide clear, accurate, and evidence-based information about products and services, including, but not limited to, disclosing whether use is extralabel or FDA-approved.
- Do not exaggerate claims regarding medication efficacy or benefits beyond what is scientifically proven.
- Disclose any financial interests or incentives tied to specific products.

### **3. Promotion of Safe and Responsible Medication Use**

- Focus marketing efforts on educating clients and veterinarians about the proper use of medications, potential risks, and benefits.
- Do not promote extralabel uses of medications and dispense only with a valid prescription from the prescribing veterinarian.
- Caution about the risks and limitations of using human- or veterinary-labeled non-prescription medications and supplements without veterinary guidance.
- Educate clients on the dangers of sharing medications between humans and non-human species, among non-human species, and between patients.

#### **4. Compounding Medications**

- Ensure all compounded medications are prepared in compliance with state and federal regulations, guidelines, and USP and AAHA standards.
- Educate veterinarians and clients about the importance of compounding for personalized treatments, especially when no FDA-approved alternatives are available.
- When available and suitable, always recommend FDA-approved products as a first-line therapy, then compounded products as appropriate.

#### **5. Medications Not Approved for Non-human species**

- Do not market human medications for non-human use.
- Do not market FDA-approved products for extralabel use without explicit veterinary recommendation. [added 6-17-2025]
- Communicate the rationale, risks, and benefits of using medications not approved explicitly for non-human species.
- Ensure such use is based on veterinary oversight and scientific evidence.
- Drugs prohibited for extra-label use in any potential food-producing animal (e.g., cattle, swine, chickens, turkeys, rabbits or honeybees) will not be marketed, advertised, or dispensed. ([21 CFR § 530.41](#))

#### **6. Cost Considerations**

- Ensure that veterinarians and clients understand that cost savings is neither a legitimate nor a legal reason to compound a medication.
- Provide transparent pricing for all medications and services.
- Offer cost-effective alternatives or solutions where possible without compromising quality, safety, or efficacy.
- Do not promote unnecessary or overly expensive treatments purely for financial gain.

#### **7. Avoid Conflict of Interest**

- Do not engage in practices that create a conflict of interest, such as offering payments or other financial incentives (e.g. rebates, percentage of sales) to veterinarians for prescriptions filled.
- Maintain professional independence and prioritize the health and safety of the patient over commercial interests.

## **8. Confidentiality and Privacy**

- Do not use patient and/or client information in marketing materials without express permission.
- Safeguard patient and client information in all marketing communications.
- Ensure compliance with legal and ethical standards for data protection.

## **9. Educational Outreach**

- Use marketing as an opportunity to educate the public and veterinary community about advances in veterinary pharmacology.
- Share information about the pharmacist's role in compounding, medication safety, and improving compliance.
- Provide resources about potential toxicities of common human and non-human medications, and other items, including foods, plants, and household chemicals.

## **10. Equitable Access**

- Do not use discriminatory pricing or marketing practices that limit access to essential medications for certain populations.
- Strive towards making medications affordable and accessible to all clients.

## **11. Labeling of Compounded, Prescribed Products**

- The labeling shall include the name of the prescribing veterinarian and the name and address of the dispensing pharmacy, and may include the address of the prescribing veterinarian.
- The established name of the drug (active ingredient), or, if formulated from more than one active ingredient, the established name of each active ingredient.
- Strength of the active ingredient(s)
- Dosage form (capsule, topical, tablet, etc)
- Any directions for use specified by the veterinarian (including class/species or identification of the animal(s) being treated; dosage, frequency, and route of administration; and the duration of therapy).
- Beyond use date as established by USP standards
- Any cautionary statements.
- The veterinarian's specified withdrawal, withholding, or discard time(s) for meat, milk, eggs, or any food that might be derived from the treated animal(s).

## **11. Ethical Advertising**

- Ensure advertisements are truthful and not misleading.
- Do not use fear-based tactics or manipulation to drive sales.
- Clearly distinguish between educational content and promotional materials.

- Be transparent in identifying financial relationships regarding educational materials or promoted products and/or services.

## **12. Professional Development**

- Continuously update knowledge and skills to provide the most current and effective evidence-based treatments.
- Participate in professional organizations and adhere to established ethical guidelines and standards.

## **13. Feedback and Accountability**

- Encourage feedback from clients and veterinarians to improve services and marketing practices.
- Establish protocols for addressing complaints or concerns about unethical marketing behavior.

By adhering to these guidelines, veterinary pharmacists can ensure that their marketing efforts align with the highest standards of professionalism and ethics, fostering trust and collaboration within the veterinary care team.

## **Definitions:**

Extralabel.use means actual use or intended use of a drug in an animal in a manner that is not in accordance with the approved labeling. This includes, but is not limited to, use in species not listed in the labeling, use for indications (disease or other conditions) not listed in the labeling, use at dosage levels, frequencies, or routes of administration other than those stated in the labeling, and deviation from the labeled withdrawal time based on these different uses (21 CFR § 530.3)

Veterinarian means a person licensed by a State or Territory to practice veterinary medicine. (21 CFR § 530.3)

Client means the owner of the animal or animals or other caretaker (21 CFR § 530.3)

Food-producing.animal means an animal used to produce human food (21 CFR § 570.3(n)). Any animal or animal products, such as milk/eggs/honey, that are to be consumed by humans is considered to be a food-producing animal, regardless of client's intent (<http://www.usfarad.org/for-pharmacists.html>).

Non-human.species

Patient

