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Opinion of the Federal Chamber of Veterinary Surgeons (Bundestierärztekammer)

on the

FVE position paper and recommendations on the use of telemedicine

The Federal Chamber of Veterinary Surgeons (Bundestierärztekammer, BTK) welcomes the initiative taken by the FVE to pave the way for a further development and implementation of veterinary telemedicine. We agree with the FVE to regard telemedicine as a valuable opportunity to further improve veterinary services, provided that a suitable legal framework has been established.

Please find in the following some specific comments on the paper:

- **LI. 45 to 50:** The suggested definition of telemedicine is left quite broad. Consequently, a mere telephone consultation, which is already now part of a veterinarian's daily routine, is regarded as a telemedicine service. This must be kept in mind when establishing a legal framework.
- **LI. 83 to 90:** While the BTK fully supports the permission of remote consulting, we do not agree with permitting to make a full diagnosis via electronic tools. Although we generally appreciate a preferably unrestricted freedom of choice for the veterinarian, we do believe that a reliable full diagnosis can only be made through a face-to-face examination. Hence, we recommend to promote the use of telemedicine services for occasions, such as follow-up examinations or herd health management, provided that regular farm visits by the veterinarian are ensured, but not as a substitute for a first face-to-face examination. Exceptions may be justified for particular minor cases, and when temporarily unchangeable circumstances do not allow to carry out a face-to-face examination.
- **LI. 92 to 105:** In line with the above mentioned criticism of remote diagnosis and according to applicable law, the BTK opposes to providing prescription drugs without the face-to-face examination by a veterinarian. However, it may be acceptable to issue a follow-up prescription resulting from a follow-up examination via electronic tools, provided that a first examination has been carried out face-to-face.

Berlin, 27 March 2020

The Federal Chamber of Veterinary Surgeons (Bundestierärztekammer) is a working group of the 17 Federal Chambers of Veterinary Surgeons in Germany. It represents the interests of all about 43.000 veterinary surgeons, practitioners as well as official veterinarians, scientists and veterinarians in other professions, towards politics, administration, and public, on federal and EU level.