Cascade prescribing Scientific Position Statement – additional guidance

Reviewed February 2024

This document provides additional guidance for cascade prescribing, beyond what is included in the **cascade prescribing Scientific Position Statement.** It should be read in conjunction with the **cascade prescribing Scientific Position Statement.**

Background information

The principle of the Cascade is that, if there is no suitable veterinary medicine authorised in the UK to treat a condition, the veterinary surgeon responsible for the animal may, in particular to avoid causing unacceptable suffering, select a treatment for the animal in accordance with the following sequence:

For vets in **Great Britain**:

Step 0	Permitted source of medicine/treatment.
Step 1	Veterinary medicine with a Marketing Authorisation valid in GB or UK wide for indicated species and condition.
Step 2	Veterinary medicine with a Marketing Authorisation valid in NI for indicated species and condition. For products not authorised in GB or UK wide a Special Import Certificate from the VMD is required.
Step 3	Veterinary medicine with a Marketing Authorisation valid in GB, NI or UK wide for a different species or condition. For products not authorised in GB or UK wide a Special Import Certificate from the VMD is required.
Step 4	Human Medicine with a Marketing Authorisation valid in GB, NI or UK wide OR an authorised veterinary medicine from outside of the UK. For products not authorised in GB or UK wide a Special Import Certificate from the VMD is required; in the case of a food-producing animal, the medicine must be authorised in a food-producing species.
Step 5	Extemporaneous preparation prepared by a vet, pharmacist or person holding an appropriate Manufacturer's Authorisation, located in the UK.
Exception	In exceptional circumstances, a human medicine may be imported from outside of the UK. For products not authorised in GB or UK wide a Special Import Certificate from the VMD is required.

For vets in **Northern Ireland**:

Step	Permitted source.
Step 1	Veterinary medicine with a Marketing Authorisation valid in NI or UK wide for indicated species and condition.

Step 2	Veterinary medicine with a Marketing Authorisation valid in NI or UK wide for a different species or condition.
Step 3	Human medicine with a Marketing Authorisation valid in NI or UK wide OR a veterinary medicine with a Marketing Authorisation valid in an EU member State. For products not authorised in NI or UK wide a Special Import Certificate from the VMD is required; in the case of a food-producing animal, the medicine must be authorised in a food-producing species.
Step 4	Extemporaneous preparation prepared by a vet, pharmacist or person holding an appropriate Manufacturer's Authorisation, located in UK.
Exception	In exceptional circumstances, a veterinary medicine with a Marketing Authorisation in GB or outside the EU may be imported, or a human medicine from outside of NI. For products not authorised in NI or UK wide a Special Import Certificate from the VMD is required.

When considering using a medicine under the Cascade a veterinary surgeon should take note of the guidance from the RCVS: https://www.rcvs.org.uk/setting-standards/advice-and-guidance/code-of-professional-conduct-for-veterinary-surgeons/supporting-guidance/veterinary-medicines/

The decision to use a medicine which is not authorised for the condition in the species being treated where one is available should not be taken lightly or without justification. In such cases clients should be made aware of the intended use of unauthorised medicines and given a clear indication of potential side effects. Their consent should be obtained in writing. In the case of exotic species, most of the medicines used are unlikely to be authorised for use in the UK and owners should be made aware of, and consent to, this from the outset.

The responsible use of veterinary medicines for therapeutic and prophylactic purposes is one of the major skills of a veterinary surgeon and crucial to animal welfare and the maintenance of public health.

The Cascade is a risk based decision-tree to help veterinary surgeons decide which product to use when there is no authorised veterinary medicine available.

The veterinary surgeon intending to prescribe the medication will need to appraise the available evidence on the safety and efficacy of the product for the particular species and condition. The veterinary surgeon should also obtain informed consent from the client for the use of an unauthorised medicine and provide them with information on use of the product and potential side effects. BSAVA provides information to assist the practitioner through its publications which are available at www.bsava.com.

Responsibility for the use of a medicine 'off-label' lies solely with the prescribing veterinary surgeon. He or she should inform the owner of the reason why a medicine is to be used under the Cascade and record this reason in the patient's clinical notes. When electing to use a medicine under the Cascade always:

- Discuss available therapeutic options with the owner
- Use the cascade to determine your choice of medicine
- Obtain signed informed consent if an unauthorized product is to be used, ensuring that the main risks are explained to the client. Written consent should be kept for 5 years and made available upon request from a duly authorised person.

Whilst the implementation of the Cascade in the treatment of species or diseases for which no licensed products are available is its most obvious application, the Veterinary Medicines Directorate provide other examples which may justify "off label" usage:

For use in NI – allowed substances are listed in the Annex

Dosage Considerations - Sometimes a veterinary surgeon may consider that the effective treatment of a particular condition in a particular animal requires a different dosage regime from that on the label of a product.

Individual Characteristics - If a particular animal has characteristics, such as age, general condition or known sensitivity to a particular substance, which the veterinary surgeon judged to present unacceptable risks and to contra-indicate the use of the authorised product, he or she could conclude that no authorised product existed for that condition in that animal and consider other treatments.

Chronic Infections - If a condition persists following treatment with an authorised product, the veterinary surgeon may consider in a particular case that there is no authorised treatment for that particular condition and that further use of medicines containing substances in the same chemical group is not appropriate.

Complex Conditions - Diagnosis is a matter for the veterinary surgeon under whose care an animal or animals have been placed. If he or she considered that in the circumstances there were two or more concurrent conditions, the treatment of each would need to be considered in accordance with the VMR. However, due account of the usual factors such as drug incompatibilities or side-effects must be considered.

Unavailability of Products - If a product cannot be obtained despite diligent search and in a reasonable time, the veterinary surgeon may conclude that in the circumstances it does not exist.

Animal owner considerations - If a veterinary surgeon considers that, for example, an elderly or disabled pet owner would have difficulty in crushing and administering tablets which were the only form in which an authorised product was available, it would be unlikely that action would be taken if he or she concluded that medicine in tablet form were not appropriate in the circumstances, and alternatives in line with the Cascade were considered. Economic reasons are not considered sufficient justification for using the Cascade.

Medicines commonly found around the home - Sometimes a veterinary surgeon may judge there is a need to alleviate a pet's discomfort until a home visit can be made or the animal brought to the surgery. It would be unlikely that action would be taken if in such circumstances a home remedy, e.g. aspirin, were to be recommended.

Antimicrobials

The VMD have stated that it is justified on a case by case basis, where culture and sensitivity indicate that a particular antibiotic active ingredient is effective against a bacterial pathogen and where knowledge of pharmacokinetics indicates that the selected product is likely to be safe and effective for the species and condition being treated, to select an VMP on the cascade that is likely to minimise resistance, i.e. a narrow spectrum antibiotic over a broad spectrum antibiotic, in place of one that has a specific indication for that condition.

VMD statement on Responsible antibiotic use under the cascade:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/522887/646732_Responsible_Use_of_Antibiotics_on_the_cascade.pdf

Vaccinations

Using a vaccination in a manner other than outlined in its Summary of Product Characteristics is an example of off-licence use. Recent vaccination guidelines from the AAHA, AAFP, ABCD and WSAVA recommend making vaccination decisions based on a risk:benefit analysis for the individual dog or cat, which may result in off-licence use. **The VMD has stated** that "a vet may make the decision to use either a shorter or longer revaccination schedule based on the age, health, or vaccination history of the animal. This is considered to be off-label use of the product and the vet takes responsibility for the decision. It is recommended that the course of action is agreed with the animal owner".

It should also be noted that using a vaccine other than in accordance with the SPC may affect the ability of a manufacturer to provide support should an adverse event occur, and have implications in terms of insurance cover and acceptance by boarding facilities.

If the outcome of the risk:benefit analysis means that a vaccination will not be given in accordance with the SPC, it is recommended that the vet makes a record of the discussion and the owner's decision, and could ask the owner to sign an off-licence consent form.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/921383/MB_23.09.20_V2_-_281595-v7-VMD_Position_paper_on_Authorised_Vaccination_Scedules_for_Dogs.pdf

Food producing animals

Veterinary surgeons should be aware that additional conditions apply when prescribing under the Cascade to food producing animals and should ensure that they are fully aware of the requirements regarding prescribing and withdrawal times for their territory:

- For use in NI – allowed substances are listed in table 1 in the Annex to Regulation (EU) No. 37/2010 https://health.ec.europa.eu/system/files/2016-11/reg_2010_37_en_0.pdf
- For use in GB – substances with an MRL are listed in the GB MRL Register as established under Article 14A of retained Council Regulation 470/2009. This can be found here https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1100404/MB_2__2097921-v1-MRLs_in_GB_editable_version.pdf

When the product is not used as authorised, for example, when a higher dose or longer duration of treatment is used, or a species for which the product is not indicated is treated, care needs to be taken to ensure that a suitable withdrawal period is set. This ensures that no residues of veterinary medicines above the MRL remain at the time of slaughter or when produce is taken.

The minimum statutory withdrawal periods are:

- 7 days for eggs and milk
- 28 days for meat, including fat and offal from poultry and mammals
- 500 degree days for fish meat

However, in cases where the authorised withdrawal periods are close to, or longer than, the statutory minimum withdrawal periods, the vet should consider other factors when setting a suitable withdrawal period.