

BVA response to VMD call for Evidence on veterinary medicines containing fipronil or imidacloprid

Section 1 – About you

The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.

We welcome the opportunity to respond to this call to evidence on veterinary medicines containing fipronil or imidacloprid.

Section 2 – Your use of flea and tick treatments

Not in our remit to comment [Questions aimed at pet owners re how they buy their products]

Section 3 – Evidence relating to environmental contamination

13. Do you hold any published or non-public evidence relating to the effects of residues from veterinary medicines containing fipronil or imidacloprid on insects that live in water or other non-target species? (For example, evidence such as reports, datasets, publications on environmental contamination from veterinary fipronil or imidacloprid, and any monitoring or ecological studies on environmental levels or risks).

- Yes
- No
- Unsure

14. If yes, please upload supporting evidence (maximum file size: 25 MB). You may also include written evidence below: [Free text option]

The BVA, BSAVA and BVZS policy position on responsible use of parasiticides for cats and dogs summarises key research in this area, and calls for a more considered, risk-based approach to the use of small animal parasiticides.

Section 4 – Your view on any potential impacts of a change in distribution category to restrict supply routes

Note: The VMD is not considering a full ban on veterinary medicines containing fipronil or imidacloprid. These medicines are important for treating and preventing flea and tick infestations and associated disease, reducing zoonotic risks, and avoiding discomfort in pets. Animal health and welfare remain paramount and continued access to these medicines for pet owners remains a key priority.

This Call for Evidence will inform the review on whether professional advice (from a vet, SQP or pharmacist) at the point of sale could support responsible use and help reduce environmental risks.

15. Do you agree with a change in distribution category to restrict supply routes for these medicines?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know

16. Please provide additional information, particularly on impacts of a potential change in distribution category for you, your business, or the wider sector (for example costs, accessibility, animal health and welfare).

Parasiticide products are commonly used on cats and dogs to prevent and treat for various parasites, including fleas, ticks and worms. As well as preventing many animal health and welfare problems, these treatments help to prevent human health risks from associated zoonotic threats. However, there is increasing evidence from multiple sources that some parasiticides are contaminating the environment. Given the importance of being able to use these products, it is essential to ensure they are used responsibly, so they continue to remain available and effective in the future, whilst being used in a way that minimises harm to the environment.

The [BVA, BSAVA and BVZS policy position on responsible use of parasiticides for cats and dogs](#) calls for a more considered, risk-based approach to the use of small animal parasiticides. We believe everyone must take concerns about the possible environmental impacts seriously, proactively promoting discussion and highlighting these challenges. Among our recommendations, we specifically call on the VMD to reconsider the classification of parasiticides which are currently AVM-GSL, and so welcome this call for evidence.

All uses of parasiticide products carry potential risks to the environment and must therefore be carefully considered. Though further research is needed to confirm pathways of environmental contamination and identify an alternative sources, there is now a significant evidence base highlighting the potential risks posed by imidacloprid and fipronil, and potentially significant quantities of active ingredients from small animal parasiticide products may be entering waterways via household drains^{1,2}. Both fipronil and imidacloprid compounds have been detected in urban dog swimming ponds in the UK³. Although data sheet advice is usually to avoid dogs bathing and swimming for a few days after treatment, imidacloprid and fipronil have been detected up to 28 days post product application in wash-off samples from bathing dogs, owner handwashing and dog bed washing⁴, as well as in the water after a simulated swimming situation⁵.

¹ Perkins, R., et al. 2020. "Potential Role of Veterinary Flea Products in Widespread Pesticide Contamination of English Rivers." *Science of the Total Environment* 755: 143560. <https://doi.org/10.1016/j.scitotenv.2020.143560>

² Perkins, R., L. Barron, G. Glauser, M. Whitehead, G. Woodward, and D. Goulson. 2024. "Down-the-Drain Pathways for Fipronil and Imidacloprid Applied as Spot-On Parasiticides to Dogs: Estimating Aquatic Pollution." *Science of the Total Environment* 917: 170175. <https://doi.org/10.1016/j.scitotenv.2024.170175>

³ Yoder, L. E., M. Egli, A. K. Richardson, A. Brooker, R. Perkins, C. T. Collins, and J. Waage. 2024. "Dog Swimming and Ectoparasiticide Water Contamination in Urban Conservation Areas: A Case Study on Hampstead Heath, London." *Science of the Total Environment* 955: 176686. <https://doi.org/10.1016/j.scitotenv.2024.176686>

⁴ Perkins, R., L. Barron, G. Glauser, M. Whitehead, G. Woodward, and D. Goulson. 2024. "Down-the-Drain Pathways for Fipronil and Imidacloprid Applied as Spot-On Parasiticides to Dogs: Estimating Aquatic Pollution." *Science of the Total Environment* 917: 170175. <https://doi.org/10.1016/j.scitotenv.2024.170175>

⁵ Perkins, R., G. Glauser, and D. Goulson. 2025. "Swimming Emissions from Dogs Treated with Spot-On Fipronil or Imidacloprid: Assessing the Environmental Risk." *Veterinary Record* 2025: e5560. <https://doi.org/10.1002/vetr.5560>

Some spread of these chemicals can be controlled through correct usage. Current advice on using treatments includes:

- ensuring clients use the correct dosage, can apply a product correctly, and avoid hand contamination and spillage.
- refraining from washing an animal or allowing them to swim for a certain number of days after treatment. As a minimum, owners should follow the advice on the data sheet, although it should be noted that recent evidence has shown topical parasiticides may be available for release into the environment for at least 28 days after application. Therefore, where reasonable and possible, products that are administered topically or through a collar should not be selected if pets swim, are having hydrotherapy, or are bathed.
- disposing of unused products, packaging, faeces and used cat litter trays responsibly and disposing of pet hair so there is no environmental and wild bird risk.
- not applying topical products prior to a grooming appointment which will involve bathing the dog.

It is possible that this advice is not strictly followed, especially when animal owners have purchased treatments without professional advice. There has been some work to improve communication around this in recent years, including from [BVA](#) and [NOAH](#), but more work is needed to ensure clear consistent messages reach the public. In the meantime, clearer communication from professionals who provide the treatments, and on the product packaging for those on general sale, may help to ensure owners are aware of the advice and the risks associated with not following this. Veterinary surgeons and SQPs prescribing and supplying parasiticide treatments must recognise they have a duty to ensure they understand the risks associated with using these products, and are able to advise clients appropriately. Advice for professionals, including through training and codes of practice, should also be updated to ensure environmental impacts are consistently taken into consideration when products are recommended to owners.

Many of those products classified as AVM-GSL are readily available in pet shops, supermarkets and online and can be purchased without professional advice on their suitable usage. Ultimately, subject to confirming a sound evidence-base and situational assessment, we'd like to see these AVM-GSL products reclassified to either NFA-VPS or prescription only (POM-V) to ensure suitable advice can be given by either a Suitably Qualified Person (SQP) or vet. Anecdotally, we have heard from professionals who were concerned that clients advised not to treat with parasiticides would simply buy a product off the shelf and potentially use this incorrectly, so removing the AVM-GSL option could help professionals to more confidently advise clients not to use parasiticides in appropriate cases. We recognise that restricting access to POM-V only could result in barriers to some pet owners accessing the care they need, but the continued use of the NFA-VPS category would mean products remain accessible and affordable.

There is evidence^{6,7} to show that the majority of cat, and especially dog, owners purchase parasiticide products from veterinary practices, but little is known about how well owners follow the advice provided, or how safely they use parasiticide products at home, especially when purchased without professional advice. A 2023 UK survey found that although spot-on treated dogs were reported to swim and be bathed less frequently than non-spot-on treated dogs, a third were still reported to swim at least monthly. How the packaging and any unused products are disposed of in homes could also be having an impact, as owners are unlikely to bring the medicines to their vet for safe disposal.

Given the potential for serious harm to natural invertebrate populations and other wildlife, we call for a proportionate and targeted approach to treatment to be taken when using any parasiticides. We

6 Berny, P. J., D. Belhadj, B. España, and A. Lécu. 2024. "Fecal Elimination of Fluralaner in Different Carnivore Species after Oral Administration." *Frontiers in Veterinary Science* 11. <https://doi.org/10.3389/fvets.2024.1279844>

7 PDSA. 2024. Animal Wellbeing (PAW) Report 2024. <https://www.pdsa.org.uk/what-we-do/pdsa-animal-wellbeing-report/paw-report-2024>

support this VMD proposal to reclassify AVM-GSL products containing imidacloprid and fipronil to require professional advice at the point of sale. It is possible that this leads to other pet parasiticide products containing alternative ingredients becoming more widely used, and given the current lack of evidence on their ecotoxicity, we call on the VMD to monitor the impacts closely. There is also an urgent need need for more research into the prevalence and impacts of veterinary parasiticide products in the natural environment, including all commonly used parasiticides, in addition to fipronil and imidacloprid, and the impacts of long acting and combination products. Research into the drivers and barriers to consumer behaviour related to purchase and use of parasiticide products would also be beneficial, and could support use of behavioural science techniques to encourage owners to use parasiticides responsibly.

It also important to consider that the European Medicines Agency (EMA) appears to be moving towards tighter controls on small animal parasiticide products, with their Committee for Medicinal Products for Veterinary Use (CVMP) developing new guidance specifically for environmental risk assessment (ERA) of ectoparasitocidal veterinary medicinal products (VMPs) for cats and dogs. Although the UK is no longer part of the EMA, under the announced SPS agreement we expect to be working closely together, and recognise that any divergence in standards could add complexity to this relationship, particularly in Northern Ireland.

Please refer to the [BVA, BSAVA and BVZS policy position on responsible use of parasiticides for cats and dogs](#) for more information and references.