Comment on Proposed Amendment to 16 CCR Section 1707.2

Protection of Animals and Pet Owners in Pharmacy Consultation

Submitted by	Salomon Stupp, Founder, The Lizzie Initiative for Pet Protection

September 28, 2026

California State Board of Pharmacy
Enforcement and Compounding Committee
2720 Gateway Oaks Drive, Suite 100
Sacramento, California 95833
Via email: Julie.McFall@dca.ca.gov

Re: October 1, 2026 meeting and draft amendment to 16 CCR section 1707.2, Duty to Consult

Dear Chair Barker and Members of the Enforcement and Compounding Committee:

The Board should not advance the draft amendment to section 1707.2 unless it expressly and effectively protects veterinary prescriptions dispensed by community, human, mail-order, and commercial pharmacies. Pet owners and animal representatives depend on pharmacists for safe dispensing and meaningful consultation, especially when a medication was developed, labeled, or commonly explained for human use but is prescribed for an animal.

The draft contains useful consumer protections, including written notice of consultation rights, documentation of consultation and declination, staff training, adequate staffing, and a next-business-day response requirement. Those protections should be retained and made expressly applicable to veterinary prescriptions. At the same time, the draft would remove the current regulation's listed minimum counseling subjects and would exempt prescriptions shipped by mail or another delivery method from required consultation. Those changes create a serious veterinary medication-safety concern.

Requested revisions

1. **Expressly cover veterinary prescriptions and animal representatives.** State that section 1707.2 applies when a pharmacy dispenses a prescription for an animal and that the animal's owner, caretaker, or authorized representative is entitled to consultation. The regulation should not leave this coverage to implication.
2. **Preserve minimum consultation subjects for veterinary medications.** For a new veterinary prescription, consultation should address directions and storage, species-specific dose and route, duration, preparation and administration, precautions, common serious adverse effects, contraindications, clinically significant interactions, missed doses, monitoring, and when to contact the veterinarian or seek emergency care.
3. **Require veterinary-specific drug information.** Consultation and written information for an animal prescription must be appropriate to the animal species and condition. Human-only information is not an adequate substitute when animal dosing, toxicity, formulation, metabolism, administration, or adverse effects differ.
4. **Protect delivered and mail-order veterinary prescriptions.** Do not create a complete consultation exemption merely because a prescription is delivered. At minimum, require an affirmative consultation offer, readily available real-time consultation before first use, written veterinary-specific safety information, and documented follow-up access to a pharmacist.

5. **Require access to an authoritative veterinary drug reference.** A community, human, mail-order, or commercial pharmacy that dispenses veterinary prescriptions should maintain current access, electronically or in print, to an authoritative veterinary drug reference. Examples include Plumb's Veterinary Drugs and the Merck Veterinary Manual. A consultation duty cannot reliably protect animals if the pharmacist lacks veterinary-specific source material.
6. **Document consultation and declination for animal prescriptions.** The pharmacy's policies should require documentation of the animal patient, species, pet owner or animal representative, prescribing veterinarian, consultation method and date, material warnings provided, questions referred to the veterinarian, and any consultation declination.
7. **Coordinate the rule with Lizzie's Laws.** The Board should ensure that section 1707.2 complements Business and Professions Code sections 4829.5 and 4069, known as Lizzie's Laws, and does not permit generic human-drug paperwork to displace veterinary-specific drug documentation or meaningful medication counseling.

Why these protections are necessary

Veterinary prescriptions frequently involve off-label use, species-specific doses, formulations that may be unsafe for particular animals, and adverse effects or interactions that differ from those described in human-oriented materials. Pet owners may reasonably assume that a dispensing pharmacy has the veterinary information necessary to answer safety questions. Without an authoritative veterinary reference and clear consultation standards, the system may complete the mechanics of dispensing while leaving a preventable patient-safety gap.

Pharmacists are essential medication-safety professionals, and the purpose of these recommendations is to give them the tools and regulatory clarity needed to protect animal patients. Clear standards would also help pharmacies train staff, answer questions consistently, document compliance, and identify when immediate coordination with the prescribing veterinarian is required.

Notice concerning legal remedies

The Board is now on notice of the foreseeable safety consequences of leaving veterinary prescriptions unaddressed. If the Board ignores veterinary prescriptions or adopts a framework that arbitrarily or inadequately excludes animal patients and pet owners from meaningful medication-safety protections, The Lizzie Initiative for Pet Protection and affected persons reserve all rights to pursue available administrative and judicial remedies. Depending on the final action and the circumstances, those remedies may include petitions for administrative review and actions seeking declaratory or injunctive relief in court. We hope litigation will not be necessary and urge the Board to resolve this issue through clear, protective regulatory language.

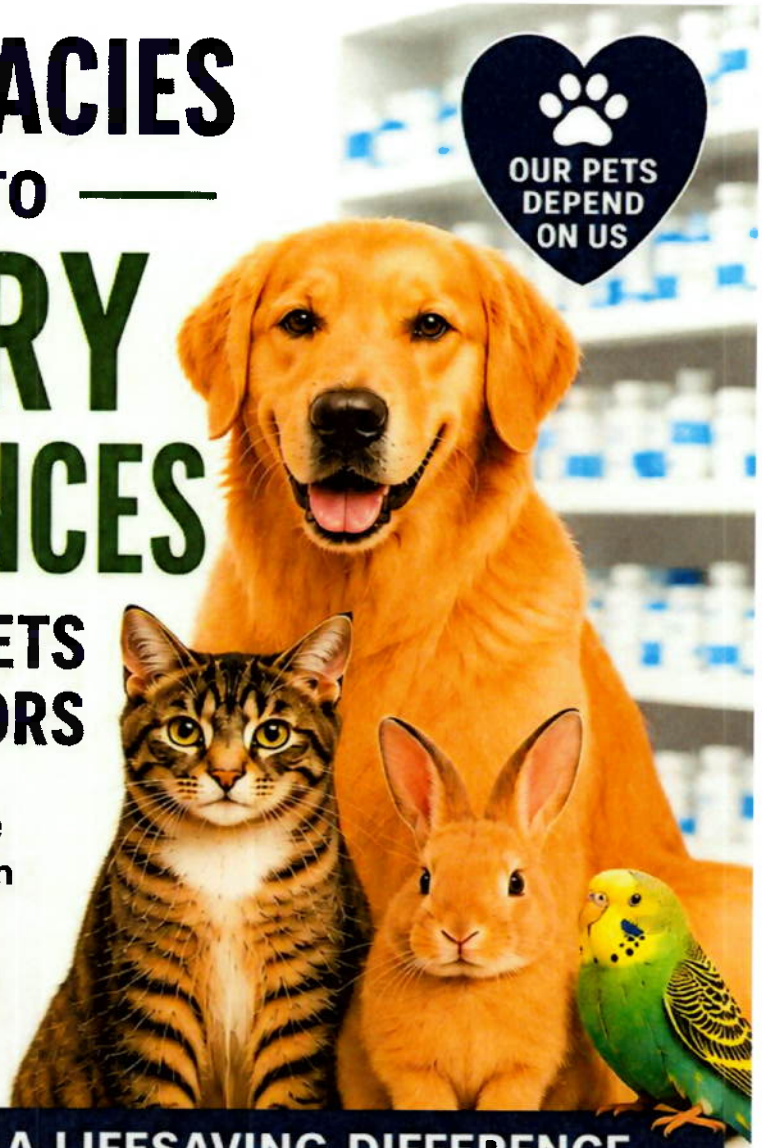
Requested committee action

Please revise the draft before referring it to the full Board, or direct staff to return with language that expressly covers veterinary prescriptions, preserves minimum veterinary counseling content, protects delivered prescriptions, and requires access to an authoritative veterinary drug reference. Please include this letter in the public record for the October 1, 2026 meeting.

Respectfully submitted,

Salomon Stupp
Founder
The Lizzie Initiative for Pet Protection

REQUIRE PHARMACIES
TO HAVE ACCESS TO
VETERINARY DRUG REFERENCES
TO PROTECT BELOVED PETS FROM MEDICATION ERRORS



Thousands of pets receive medications filled at human pharmacies.

Without access to veterinary drug references, dangerous errors can happen.

A SIMPLE REQUIREMENT. A LIFESAVING DIFFERENCE.

Veterinary drug references provide critical species-specific dosing, warnings, and safety information.

Access to authoritative online veterinary drug references helps pharmacists prevent medication errors and protect pets.

Protect pets from preventable harm, suffering, and even death.

Give pet families peace of mind knowing their beloved pets are safer.

WE URGE LAWMAKERS TO REQUIRE ALL PHARMACIES THAT DISPENSE VETERINARY PRESCRIPTIONS TO HAVE ACCESS TO AUTHORTATIVE ONLINE VETERINARY DRUG REFERENCES.



THE LIZZIE INITIATIVE
— FOR PET PROTECTION —

Stronger protections.
Safer medications.
Healthier pets.
A better future.
Because they can't speak for themselves.

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