

Reproduced by kind permission of Dogs Monthly Magazine

## Who can legally treat Animals with Complementary Therapies?

The issue of impostors posing as Vets has been in the news recently, along with a number of prosecutions. Attention now seems to be turning to the plethora of well-meaning people seeking to treat animals with complementary therapies, often advertising on the internet, who are clearly not qualified and registered Vets. The matter has even been noted in meeting in the House of Commons. Hence the Editor asked me to clarify the situation for readers.

The two main legal issues are the Veterinary Surgeons Act 1966, and the Animal Welfare Act 2006 [or, in Scotland, the Animal Health and Welfare (Scotland) Act 2006].

The law is very specific through the Veterinary Surgeons Act, as to who can and who cannot treat animals. The basic rule is that a qualified veterinary surgeon is the only person allowed to treat animals. There are a number of exceptions to this, for instance to allow people to give their own animals minor medical treatment, but non-veterinarians can only treat animals if one of the specific exceptions applies. ([see blue section](#))

The commonly-forwarded and erroneous notion that one can treat without charging or suggesting that the animal can self-select its therapy, in order to avoid acting illegally, is not a way around the law. Acupuncturists, Homeopaths, Aromatherapists and other complementary therapists can only treat animals if they are qualified vets.

The only non-veterinary therapists allowed to treat animals, but then only with direct referral by a vet, are those using treatment by physiotherapy.

[[Blue section in box?](#)]

[Section 19 of the Veterinary Surgeons Act 1966 says that, with certain exceptions, only registered veterinary surgeons may practice veterinary surgery in the United Kingdom. "Veterinary surgery" is defined broadly. Section 27 says that this expression "means the art and science of veterinary surgery and medicine and, without prejudice to the generality of the foregoing, shall be taken to include-](#)

- [\(a\) the diagnosis of diseases in, and injuries to, animals including tests performed on animals for diagnostic purposes;](#)
- [\(b\) the giving of advice based upon such diagnosis;](#)
- [\(c\) the medical or surgical treatment of animals; and](#)
- [\(d\) the performance of surgical operations on animals."\]](#)

The relevant exceptions are:

- 1) A doctor or dentist may carry out treatment at the request of a veterinary surgeon.
- 2) An animal may be treated by 'physiotherapy', if it is carried out under the direction of a veterinary surgeon, who has examined the animal and prescribed such treatment.
- 3) An owner [or a member of the owner's household, or the owner's employee] may administer minor medical treatment to his or her own animal.
- 4) The owners of farm animals, and people engaged or employed in caring for farm animals, may give them medical treatment or carry out minor surgery. They may not, however, do so for reward, and any minor surgery must not involve entry into a body cavity.
- 5) In addition, a lay person may administer first-aid in an emergency, for the purpose of saving life or relieving [pain or]suffering.

There is no exemption for non-vets, whether they be pharmacists, herbalists, aromatherapists, homeopaths, acupuncturists, bach practitioners, schuessler practitioners, anthroposophists or anyone else administering medicines [except within the terms of the exceptions mentioned above]. Even veterinary nurses are not allowed to prescribe the 'alternative' or 'complementary' medicines.

The current common practice of many chiropractors and osteopaths is to press on and treat an animal, if invited to do so directly by an owner. This is, strictly speaking, illegal. Physiotherapists, when approached directly by owners, often tell owners that they must ask for a vet's permission/referral. This is also, strictly speaking, incorrect practice. In both cases, a vet should have directly specified that form of therapy for it to be legally carried out, having first examined the animal, and should have actively recommended a particular manipulative therapy and practitioner. The treatment should then be properly monitored by that veterinary surgeon. If a physiotherapist, chiropractor or osteopath recommends or supplies medicines, in addition to the hands-on work, that is frankly illegal, as is offering advice on a vet's prescription.

On the prescribing and/or supply of medicines, the Veterinary Medicines Regulations 2007 specify who may prescribe and supply of medicines, and that prescription or supply otherwise than in accordance with the regulations does not become legal even if a vet consents to it. Accordingly non-veterinary homeopaths and non-veterinary acupuncturists, non-veterinary aromatherapists (etc) may NOT treat animals, even under the 'cover' of a vet. This is because that vet has no way of understanding or safely monitoring treatment, unless *au fait* with the therapy (in which case, he (or she) would surely use it himself

As can be seen from the detail of the Veterinary Surgeons Act, it is also illegal for a non-Vet to advise, based on a veterinary diagnosis. If therapists or dieticians are advising on illnesses, therefore, they should only do so through a vet.

Let us take a specific example with Aromatherapy. The reason being that there is a growing body of “practitioners” who claim to be outside the Veterinary Surgeons Act as they allow the animal to “self-select” the required remedy and dosage of such.

If we first look closely at ‘essential oils’, many are powerful and highly active ingredients of plants, which have very direct and well-known pharmacological activity. Some are even dangerous to use in pregnancy, having abortifacient properties. The term 'essential oils' is really a misnomer, since they are really any aromatic, volatile compounds from plants, not necessarily oils at all. Different remedies are variously described as emmenagogues, diaphoretics, antiseptics, vulneraries, vermifuges, vasoconstrictors, expectorants, hypertensors, hypotensors, sedatives, febrifuges, carminatives, cholagogues, cicatrisants, analgesics, antidepressants etc. Tisserand claims anti-viral properties for certain essences. These are clear descriptions of medicinal properties.

The 'essential oils' are usually used externally but are known to cross the skin, to act internally and systemically, to work their healing powers. This is, in fact, a major purpose of the practice. This fact alone would further justify their classification as medicines.

Further justification for the rôle of veterinary surgeons would be found in the safety aspects of the medicines. Nelly Grosjean says, in '*Veterinary Aromatherapy*': "We know that aromatherapy is the use of essential aromatic oils to prevent and cure disease. It is in fact one of the most important techniques used in complementary or natural medicine - also known as holistic or alternative medicine. Natural medicine is often thought of as 'gentle', but that would not really be an appropriate term here .....". Note, incidentally, that she again refers to 'medicine', quite apart from highlighting dangers. In '*Aromatherapy*', Danièle Ryman writes: "Sadly, however, it is a false claim that the therapy is 100% safe, and that the therapy is for everyone; there are actually some severe dangers in self-help aromatherapy." Other references to dangers exist in the literature.

So we know that the remedies fit the description of medicines and so their use is medical treatment for the purposes of the Veterinary Surgeons Act.

Those espousing “self-selection” argue there is no diagnostic element in their use of aromatherapy for animals, as if this was a way around the legislation, which it is clearly not. If this were truly to be the case, the 'art' of the aromatherapist would surely be reduced to a purely reflex offering of a remedy for a given symptom, as described by a modern vet. The 'art' would be removed completely. The fact is that many modern scientific veterinary descriptions do not sit well with the 'alternative' understanding of disease and therapy. This means that there must be application of 'alternative' understanding of disease, in order to properly and effectively select and offer the essential oils as therapy, just as there is for homeopathy or for herbal medicine. Aromatherapy, properly carried out, is a holistic treatment. Why would Aromatherapists run courses, if only to list certain remedies and concoctions for given symptoms? Why would not ‘ordinary’ vets be using the remedies, if it truly were that simple?

I would not wish to appear to denigrate Aromatherapy. Animals respond well and there are results unobtainable by other methods. I would not wish to be without Aromatherapy Oils. They are an indispensable part of the medical armoury. I respect them enormously, as the powerful and valuable medicines that they are. However, the conflict between those seeking to evade the Veterinary Surgeons Act causes further problems out with these arguments also. I don't remember ever having received a call from a non-Vet Aromatherapist, to check with me whether their treatments were compatible with mine before they have prescribed. This could lead to serious animal welfare problems, since aromatherapy has the ability to counteract Homeopathy and possibly other treatments as well. This is a worry to me and so we should also consider the Animal Welfare Act 2006.

The Animal Welfare Act places a positive requirement on a person responsible for an animal to ensure it is protected from pain, injury, suffering and disease to the extent required by good practice. The subjects of indemnity insurance and accountability thus also enter the equation here. Is an owner likely to be able to obtain the same satisfaction from a non-Vet "therapist" as is possible via the RCVS and a vet's indemnity insurance, should anything go wrong? If an owner and a non-veterinary practitioner have treated an animal, then there is a possibility of criminal prosecution, should that animal either fail to respond or worsen as a result of that "treatment". If a vet has been treating the animal, then the likelihood of success of such action is negligible, since an owner has taken all possible steps to relieve suffering.

To those who treat animals without proper veterinary training, I say apply and train to be a Vet so you can do your best for patients. Remember nearly 50% of those who apply to train get in to Vet School so there is little excuse for putting pets at risk by treating illegally.

While we cannot all be Vets, we can do our best for our pets and this ultimately must always be our aim when making decisions over treatment options, and what to do for the best.

Mark Elliott BVSc VetMFHom MRCVS MIPsiMed PCH DSH RSHom 280508