

Alexander S. Mathews
President and CEO

January 24, 2019

Ms. Karen Winkel
Rules Coordinator
Department of Consumer and Business Services
350 Winter St. NE
Salem, OR 97301

RE: Establishment of Oregon Prescription Drug Price Transparency Program, reporting requirements, fee, civil penalties

Dear Ms. Winkel:

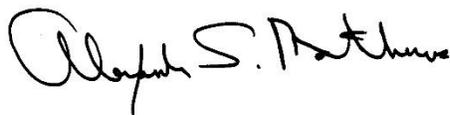
I am writing to ensure that a proper interpretation of a recently passed bill in the State of Oregon will allow farmers, veterinarians and pet owners to have access to important medicines for their animals. The Animal Health Institute is the national trade association representing companies that make medicines for animals.

As you know, House Bill 4005 was recently passed establishing a statewide prescription drug cost and price transparency program. It is clear from the bill and the legislative history that the intent of the bill is related to human drugs, not those used in veterinary medicine. While the definition of "drug" is broad and could be interpreted to include veterinary drugs, this is clearly not intended. The preamble of the bill includes clauses referring to the state's interest as a "major purchaser of prescription drugs" and the state's provision of tax expenditures for health care, situations that do not pertain to the veterinary drug market. There are significant differences between the distribution of human and animal drugs makes the application of this act unworkable for the animal drug market.

We ask that the rulemaking contain a clear statement that the requirements of this act do not apply to manufacturers of veterinary drugs.

Thank you for your attention to this matter.

Sincerely,



Alexander S. Mathews