

28 January 2022

To

Anthony Stewart
Senior Investigator
Commerce Commission
44, The Terrace
Wellington 6140
New Zealand

From

Laura Green
Tony Dellow

By Email

anthony.stewart@comcom.govt.nz

Dear Anthony

Response to Statement of Issues

We refer to the Commerce Commission's Statement of Issues relating to Zoetis' application for clearance to acquire Betrola Pty Ltd (including its wholly owned subsidiary, Jurox Pty Ltd) (**Jurox**).

In general, Zoetis does not have additional matters to raise over and above those already set out in the application. In this response, we provide additional information and data that has subsequently come to light, in respect of the two markets that the Commission is continuing to investigate.

The market analysis for the clearance application was based on Baron 2020 data, whereas we are now able to rely on the Baron 2021 Dec MAT data. In this response, we refer also to the SVS price books for 2020 and 2021, which SVS has provided to Zoetis. The books contain the full set of products that SVS sells in New Zealand. As set out in the clearance application, SVS is the largest, nation-wide distributor to the vet channel in New Zealand. As far as we are aware, SVS is the only distributor that makes their price book available.

Opioid-based pre-anaesthetics and sedatives for companion animals

There are more market participants than it was originally possible to identify in the clearance application, based on Baron 2020 data. The updated status of Zoetis and Jurox's competitors in this market is as follows:

Supplier	Products	Status in New Zealand
Troy	Illium Butorgesic	[] sales revenue based on Baron 2021 Dec MAT data (and sold by SVS).

MSD	Dolorex	[] sales revenue based on Baron 2021 Dec MAT data (and sold by SVS). For completeness, sales revenue for MSD's Dolorex was also included in the Baron 2021 June MAT data but was not reported in the Baron 2020 data. []
Ceva	Vetergesic	Registered and marketed – sold by SVS
Dechra	Calesdate	Registered but no evidence of being marketed in NZ
Akorn	Butorpic	Registered but no evidence of being marketed in NZ
Ausrichter	Butomidor	Registered but no evidence of being marketed in NZ

Antidotes for short-term pre-anaesthetic sedatives for companion animals

There are more market participants than it was originally possible to identify in the clearance application, based solely on Baron 2020 data.

The updated status of other players in this market is as follows:

Supplier	Products	Status in New Zealand
Ceva	Reversamed Injection for Dogs and Cats	Registered and marketed – sold by SVS
Ferrari Animal Health Pty Ltd	Mobitor Injection	Registered – sold in Australia (see https://www.ferrarianimalhealth.com.au/mobitor-injection) but no evidence of being marketed in NZ
Le Vet Beheer B.V.	Sedastop 5 mg/ml solution for injection for cats and dogs	Registered but no evidence of being marketed in New Zealand

In addition, antidotes in this market are a "nice-to-have" for the earlier wake up and comfort of the animal, but they are not a necessity. Instead of using an antidote, the animal can be left to wake up as the sedative wears off. That being the case, a constraint on the price of Zoetis and Jurox's products in this market is the option for vets not to use them at all.

Zoetis understands that most vets would use sedatives (Domosedan) to carry out minor procedures (eg. x-rays, stitching up small wounds under local anaesthetic), and would aim to reverse the sedation. Pre-anaesthetic sedation with this type of sedative is used very rarely, as these sedatives are very hypotensive. An example of when they would be used is if a vet conducts an x-ray and decides to go straight into surgery. In those cases, the vet would most likely not reverse the sedation.

We hope the above is useful, please do not hesitate to contact us if you have further queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tony Dellow', on a light yellow background.

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