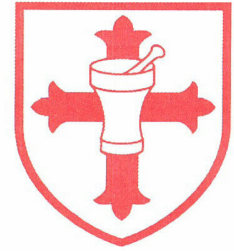

GHP

*Guild of
Healthcare
Pharmacists*



25th November 2008

Roy Drepaul
MHRA
16/139 Market Towers
1, Nine Elms Lane
London SW8 5NQ

Dear Mr Drepaul

**MLX 351: Proposals for Amendments to Medicines Legislation to Allow Dispensing Opticians
Access to Certain Prescription Only Medicines (POMs)**

Response from the Guild of Healthcare Pharmacists

Thank you for the opportunity to respond to this consultation. The Guild of Healthcare Pharmacists represents UK wide around 4,000 pharmacists including the majority of hospital pharmacists, pharmacists employed by Primary Care Trusts (PCTs) and pharmacists employed by other public bodies such as the Commission for Social Care Inspection and the Healthcare Commission. The Guild is part of the health sector of the union Unite.

In general we support the proposals but have some reservations on the reasons behind them.

1. Proposal to allow registered dispensing opticians to obtain wholesale supplies of POMs:

Tropicamide
Cyclopentolate Hyd.
Amethocaine Hyd
Oxybuprocaine Hyd
Chloramphenicol eye drops 0.5% and ointment 1%
Lignocaine hyd
Proxymetacaine hyd

President: Richard Cattell

*Professional Secretary: Jean Curtis, 6, The Sycamores, Bishops Stortford, Herts CM23 5JR
Tel / fax: 01279 831685 Mobile: 07979 245346 Email: Jeancm23@aol.com Website: www.ghp.org.uk*

It is not stated but we would expect that these drugs would be restricted to eye drops, not any other formulation.

We are not impressed by the reasons given for changing the law ie obtaining the optometrist's signature in time to avoid stocks being out of date etc. We consider that this would amount to poor organisation and control.

From the wording of the proposals it would appear that the use of these items is to be restricted to use by optometrists. Perhaps ophthalmologists may attend a practice and wish to use them?

It will not be possible for wholesalers to stop the products being used for other purposes and perhaps in some cases the use might be logical, for example a dispensing optician obtaining tropicamide eye drops for use in a retinal screening programme.

We agree in principle with the proposal but consider that the details need to be examined carefully.

2. Proposal to allow registered dispensing opticians who are also registered as contact lens specialists on the General Optical Council register to obtain wholesale supplies of POMs for administration in the course of their professional practice:

Amethocaine Hyd
Chloramphenicol eye drops 0.5% and ointment 1%
Lignocaine hyd
Oxybuprocaine Hyd
Proxymetacaine hyd

We assume these drugs would be restricted to eye preparations.

We support this proposal. Contact lens specialists should have access to the eye preparations they need in the course of their practice.

We hope these comments are of assistance

Our reply may be made freely available.

Yours sincerely

Jean Curtis

Jean Curtis
Professional Secretary