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CORPORATE AND STRATEGIC
DEVELOPMENT

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Dear Alex

Consultation Letter MLX 296: Proposals to Prohibit the Sale, Supply or Importation of Unlicensed Herbal Medicinal Products for Internal Use Which Contain *Senecio* Species

The Royal Pharmaceutical Society of Great Britain is the professional and self-regulatory body for pharmacists in Great Britain. The Society's functions include: maintaining the register of pharmacists and pharmacies; regular inspection of pharmacies to monitor standards of practice and compliance with legal and professional requirements; accrediting undergraduate pharmacy degree courses; ensuring fitness to practise at the point of registration; promoting continuing education; producing clinical audit tools for pharmacy practice and tools to support uni- and multiprofessional clinical governance. The Society also produces a Code of Ethics containing standards governing the conduct and practice of pharmacists.

The safety concerns of herbal preparations for internal use containing *Senecio* species are well documented and we are not aware of any substantial efficacy or other data that would alter the risk-benefit profile. Further, we too consider that any continued supply of *Senecio* in unlicensed medicines for internal use poses a serious risk to public health.

We therefore support the Agency's proposal that an order should be made under Section 62(3) of the Medicines Act 1968 to prohibit the sale, supply or importation of unlicensed medicinal products containing *Senecio* species, except in relation to those for external use.

We note that this proposal does not affect any medicinal product containing *Senecio* which holds a marketing authorisation, or registered homoeopathic medicines.

Yours sincerely

Prof A C Moffat
Chief Scientist