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Ref: mlx 306
18 August 2004

Dear Mrs Ryan,

Re: MLX 306: Amendments to the Range of Medicines which can be sold, supplied or Administered by Optometrists

I write on behalf of the Royal Pharmaceutical Society of Great Britain to respond to the above consultation document. The Society welcomes the opportunity to comment.

1. The consultation document proposes the extension of POM medicines which optometrists may sell, supply or write orders for. (Sale or supply being subject to the requirements that it is part of their professional practice and in an emergency.) (paragraphs 8-9)

The Society is content with this proposal.

2. The consultation document proposes to allow optometrists, who have undertaken extended training and are accredited by the GOC to sell, supply or write orders for an additional range of POMs (paragraphs 11 - 12)

The Society has concerns that some of the products in the extended list are POMs but with an exemption in certain conditions as a P, eg azelastine and sodium chromoglycate. If they are used outside the licence and supplied by an optometrist to a patient, then a patient may then request a repeat from the pharmacist. Pharmacists cannot supply P medicines outside their licensed indications.

Will the optometrist always be supplying a product within the terms of its license? An optometrist cannot write a prescription, therefore there would have to be a change in the Marketing Authorisation of the product for the optometrist to be able to supply against an optometrists written order. The pharmacist would have to be able to check which optometrists had undertaken further training.

For the reasons stated above the Society objects to this part of the proposal at this time.

3. The consultation document proposes to allow optometrists to sell or supply GSL and P medicines other than in an emergency (paragraph 14).

The Society believes that the public is well served by community pharmacies, where GSL and Pharmacy medicines are available without a doctor's prescription, and with professional advice from a pharmacist who is an expert in the use of medicines. We believe that this would be the preferred source of medicines for most patients.

For the reasons stated above the Society objects to this part of the proposal at this time.

Yours sincerely

Mrs C Green
Pharmacist Adviser