



# Royal Pharmaceutical Society of Great Britain

Helping pharmacists achieve excellence

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PRACTICE AND QUALITY IMPROVEMENT

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Dear Ms Lawrence,

## **Re: ARM 25 – Request to reclassify a product from POM to P**

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

The Society welcomes the proposal to reclassify chloramphenicol eye drops 0.5%, with the proviso that pharmacists involved in sales are issued with appropriate guidance and training to ensure the safe and effective use of this product.

The Society believes that the public is best protected by purchasing their medicines through a pharmacy where professional advice is available and that pharmacists are equipped with the knowledge and skills to safely diagnose and recommend appropriate treatment for the indications proposed.

The Society requests that the following points be taken into consideration:

- *Wording of the indications:* A definition of conjunctivitis might be appropriate.
- *Risk of misdiagnosis:* There will always be a risk of possible misdiagnosis and this may occur within the GP surgery setting as well as in community pharmacies. To reduce the risk, training should be targeted to all pharmacists likely to be involved in supply.
- *Length of treatment to be advised before seeking medical advice if symptoms worsen or do not improve:* Two days is the period of treatment to be advised which would appear to be appropriate. It is important to stress that no improvement in symptoms would require the customer seeking further medical advice.
- *Total length of treatment:* Five days seems appropriate for a course of treatment.

- *Advice for contact lens users and those who have had eye surgery:* The patient information leaflet should detail in bold, underlined or larger typescript the cautions for contact lens users and those who have had eye surgery. Pharmacists should have this advice incorporated within their training material.

Public health and patient safety issues, which apply to all eye drops, are that:

- The design of the packaging permits easy differentiation between eye and ear drops.
- The labelling is clear on both the eye drop container and packaging to indicate the product is for ocular use only. This is a particular problem for chloramphenicol as it is available in both eye and ear drop formulations.

Thank you for consulting the Society.

Yours sincerely,

Sadia Khan  
Practice Pharmacist

