14 June 2006

PRACTICE AND QUALITY
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Mr Lea Reynolds
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Dear Mr Reynolds

Re: The Veterinary Medicines Regulations 2006, Supporting Regulatory Impact Assessment and Veterinary Medicines Guidance Notes

The Royal Pharmaceutical Society of Great Britain (RPSGB) is the professional and regulatory body for pharmacists in England, Scotland and Wales. It also regulates pharmacy technicians on a voluntary basis, which is expected to become statutory under anticipated legislation. The primary objectives of the Society are to lead, regulate, develop and represent the profession of pharmacy.

The Society leads and supports the development of the profession within the context of the public benefit. This includes the advancement of science, practice, education and knowledge in pharmacy. In addition, it promotes the profession's policies and views to a range of external stakeholders in a number of different forums.

The Society has responsibility for a wide range of functions that combine to assure competence and fitness to practise. These include controlled entry into the profession, education, registration, setting and enforcing professional standards, promoting good practice, providing support for improvement, dealing with poor performance, dealing with misconduct and removal from the register. The Society also produces a Code of Ethics containing standards governing the conduct, the practice of pharmacists and pharmacists competencies.

Pharmacists under their Code of Ethics are only able to operate within their range of competence. All pharmacists must adhere to the RPSGB Code of Ethics and it is enforced through the RPSGB regulatory machinery. The ultimate sanction would be removing the pharmacist's name from the Register. The Society's forthcoming Section 60 Order will also provide the ability to suspend or restrict practice and where necessary prevent a pharmacist prescribing.

The Royal Pharmaceutical Society of Great Britain welcomes the opportunity to participate in the consultation process.

We would make particular comment on the following: -

Schedule 3 Pharmacist Premises

States 27. (1) "A pharmacist may only supply a veterinary medicinal product classified as POM-V, POM-VPS or NFA-VPS from premises registered as a pharmacy with the Royal Pharmaceutical Society of Great Britain or with the Pharmaceutical Society or Northern Ireland".

This would appear to prevent pharmacists for supplying VMP's from any location that is not a registered pharmacy. A number of pharmacists operate form premises that are dual registered as pharmacies and merchants and need to be able to supply from premises registered as merchants.

Schedule 3 Form of Prescription

Paragraph (5) does not indicate any limit on the number of times a prescription may be instructed for repeat.

We would suggest that a limit on number of repeats or the total time during which repeats are issued may be considered.

Schedule 3 Labelling at the time of retail supply

Paragraph 11.(2) states that a label may be altered "provided that the un-amended information remains clearly visible".

We feel that may lead to ambiguity, for dosage instructions in particular, where these have been altered by the prescriber.

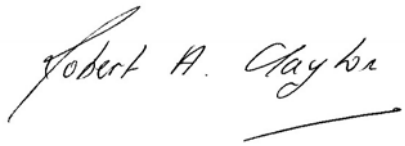
In addition we would make the following observations: -

1. Regulation 18 (1)(b). It may be useful to have the proprietary name of the product or the manufacturer's name here. There may be a number of generic equivalents for some products.
2. Regulation 19 (3). Should the quantity disposed of be included here?
3. Regulation 23 (1) (b). A mixture of batches may have been supplied. Should this say "…batch number(s)?
4. Regulation 25 p.13. There is no definition of "unauthorised veterinary medicinal products"

5. Regulation 6 p.72. Should this include “or official representative”?
6. Regulation 8 p.73 How do you propose to enforce this regulation?
7. Regulation 10(2) p.73. Why remove the requirement for “in ink or other indelible format”?
8. Regulation 13 (4) When SQPs supply from premises other than approved premises there appears to be no criminal sanction only a new administrative action under Regulation 13 (7) p.76. This is inequitable with regulations 7 (1) and (2) p.72.

We hope these comments are useful.

Yours sincerely



Robert Clayton
Head of Practice

Cc John Fitzgerald - VMD