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30 August 2007

Dear Mr Reynolds

Distribution Category Review – Horse Vaccines and Cat Flea Treatments

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 pharmacist's 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 Pharmacists and Pharmacy Technicians Order 2007 also provides 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 like to make the following comments:

Cat Flea Products

The RPSGB supports the recommendation of the Working Group to reclassify *Advantage*, *Fleegard*, *Frontline* and *Top Drop* from POM-V to NFA-VPS. We would like to express concern that *Program Suspension for Cats* is being recommended for reclassification to AVM-GSL.

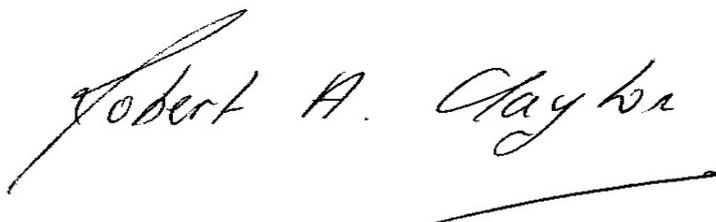
Program is not an adulticide. We would therefore recommend there is greater need for advice at the point of sale to highlight this limitation and ensure appropriate use of *Program*. This can be done in community pharmacies by suitably trained pharmacists.

We note that *Stronghold* is not in your list of Cat Flea Products and wonder if this is an omission.

Horse Vaccines

At the present time we would support the Working Group's recommendation that Horse Vaccines, especially if injectable, should remain POM-V. We would like to highlight that pharmacists have detailed knowledge of the use and administration of vaccines and those who are specialists in this area are competent to administer and instruct on the administration of vaccines.

Yours sincerely

A handwritten signature in black ink that reads "Robert A. Clayton". The signature is written in a cursive style and is positioned above a horizontal line that serves as a separator.

Robert Clayton
Head of Practice

cc:
Andrew Cairns (Chair VPG)
Meghna Joshi (Professional Secretary VPG)