

22 February, 2003

Scottish Executive

Primary care division,

St. Andrew's House,
Regent Road,
Edinburgh,
EH1 3DG

Dear Mr.Fraser:

I own a small Pharmacy in Penicuik. I am writing to you with regard to The Office Of Fair Trading's Report into NHS community pharmacy. The report's sole recommendation is that the control of entry regulations be abolished. I would urge The Executive to strongly reject this recommendation.

The OFT have NO REMIT to investigate the NHS or it's workings. Subsequently may I show you how the OFT report is at best misleading and at worst disastrous for the NHS dispensing service. First may I give you some background information: There are three legal categories of medication available to the public:

1. GSL [general sales list] these medicines are available to buy anywhere i.e. garage forecourts, supermarkets etc.
2. P [pharmacy only] these medicines are available to buy only in a registered Pharmacy and sold under the supervision of a Pharmacist.
3. POM [prescription only medicines] these medicines cannot be bought but are supplied by a registered Pharmacy with a Health Board contract to a patient with a Prescription written by his Doctor. i.e. NHS dispensing service

At the moment the status quo is that a pharmacy can be opened in almost any location as long as it meets the standards laid down by the registering body, namely The Royal Pharmaceutical Society. Once registered, the pharmacy can then sell medicines [GSL and P] to the public. However, in order to dispense NHS prescriptions [POM medication] it must have a contract with the Health Board. The Board awards these contracts where they deem it necessary or desirable to provide a comprehensive pharmaceutical service. The end result is a planned distribution of pharmacies where they are needed by patients.

Sadly the OFT report, fails to differentiate between medicine sales [GSL and P] and NHS dispensing services. Indeed I am sure that on release of this report *they* did not know there was a difference.

If the OFT recommendation goes through all the major supermarket chains will open pharmacies in their stores { not to provide a better health service but to try and sell more cans of beans}. This will take just enough business away from the Town Centre, Housing estate and even Rural pharmacies to result in wide spread closures. Subsequently the planned distribution of Pharmacies and the comprehensive pharmaceutical service {built up over the last 15 years} will be lost.

The Control of entry regulations were introduced in 1987 to secure a rational distribution of pharmacies throughout local communities and to ensure ready and easy access to pharmacy services. This would all be lost and the "walking " patient's i.e. the elderly, young mums with prams and those without cars will suffer greatly. Also at risk would be the Scottish Executive's *The Right Medicine*. This would be almost

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impossible to achieve without a proper-planned network of community pharmacies.

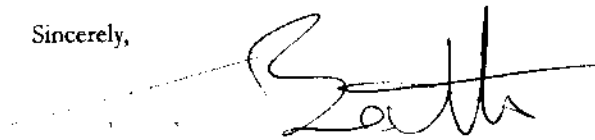
A recent report by The Scottish Consumer Council states that over 90% of the Scottish public are very happy with the community pharmacy network as it stands. It would appear that this system of care is not broken, so why is the OFT trying to fix it?

To sum up, I would strongly urge you to reject these proposals on the following grounds

1. That the elderly, infirm, housebound, families on low income, nursing mothers with young children, and those unable to travel by car will suffer greatly
2. That *The Right Medicine* will be impossible to implement.
3. That the supermarkets can open a pharmacy at present if they wish, without disturbing the planned network of NHS pharmaceutical services required by the people of Scotland.
4. That planned strategy for health in Scotland be made by the People Of Scotland via The Scottish Executive not by those major companies with the largest chequebooks via the OFT.

Lastly I would like to invite any concerned member of The Executive to my pharmacy to discuss these matters and to let them see firsthand how well the system works at present.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Beattie', with a long horizontal stroke extending to the right.

Tom Beattie