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25thFeb.2003

Dear Mr Fraser

I am writing to you on the subject of the Office of Fair Trading Pharmacy Inquiry.

We have extensively upgraded our premises to meet the future challenges laid out in the Scottish Pharmacy Strategy "The Right Medicine" on the future of community pharmacy. This, as you know, laid great emphasis on using pharmacists' existing skills to relieve the pressure on local doctors and to create in the longer term a further "medical centre" to improve patient care especially in relation to providing repeat prescriptions and monitoring drug use by the elderly and infirm. With your white paper in mind the following points should be appreciated.

- 1) 80 to 90% of a pharmacist's job and turnover is as a provider to the Health Service not as a retailer.
- 2) The main thrust of the OFT report is that drugs should be cheaper to the consumer if a free for all were to be allowed. This is already the case as retail price maintenance was scrapped two years ago so that there is full competition for the sale of our over-the-counter drugs.
- 3) One of the most important services provided by a pharmacist is the monitoring of the patients' medication and ensuring they understand its purpose and how it should be used. We maintain detailed computer records of all our patients so that drug interactions may be monitored and if a serious interaction is highlighted then conferring with the doctor to ensure they are aware of the issues and to try and protect the patients from adverse reactions.
- 4) With the present numbers of pharmacies a close relationship is built up with the local GPs and very useful professional exchanges on patient care take place daily. Clearly if the number of pharmacies increase and supermarkets have three pharmacists operating a shift system per day this form of relationship would not exist and most importantly the patients might move from one to another not understanding that their records would not be available.
- 5) The present system ensures a fair and equitable distribution of pharmacies. It does not prevent pharmacies from opening ONLY deciding whether a new NHS contract for dispensing is **necessary and desirable**. This was the reason that a limited licensing procedure was adopted.

- 6) The distribution of pharmacies would revert to clustering around GP surgeries as previously rather than being spread amongst the community as now. In September 2002 the Scottish Consumer Council reported that 90% of people are happy with the location of their pharmacy and other surveys have shown equally high satisfaction with the service provided. The OFT might well say it would benefit consumers to have a pharmacy on every street – as they would for having GP surgeries on every street but given the limited resources available in NHS, the control of entry represents an effective and logical method of resource allocation. The OFT suggests there could be substantial savings in regulating the present system but the cost of overseeing an even greater number of pharmacies would largely off-set this apparent saving and massively increase the cost of the NHS trying to implement your white paper.
- 7) If numbers of prescriptions by each pharmacy dropped many smaller local pharmacies would become unviable. Most of these are within walking distance of the patients and provide a delivery service for the high percentage of elderly people who require several prescriptions and certainly are not able to drive to a supermarket.

In conclusion patients are not the same as consumers and the OFT has ignored the fact that 80 to 90% of most pharmacy work is carried out for the NHS and failed to see the importance of the relationship of patient, pharmacist and doctor at a local level, thus throwing away the elements of personal care for “our patients” for a misconceived possible saving on over-the-counter drugs which in fact already exists. If successful such a free-for-all would destroy the aims and important patient-care improvements suggested by the well-researched and fully supported Scottish Pharmacy Strategy – the Right Medicine.

Please do not let the logic of our parliament be over-whelmed by the OFT.

Yours Sincerely



Ian Brown
Pharmacist
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