

1. The NHS is pharmacy's biggest customer.

- The NHS is the major purchaser of pharmacy services, not individual consumers.
- 80% of the turnover of most pharmacies is from NHS services.

2. NHS and OFT consumer interests may differ.

- The NHS has a major interest in the pharmacy service and should be concerned about the recommendations of a body primarily concerned with competition and consumer interest.
- The Welsh Assembly Government should recognise that the interests of the NHS and patients using NHS pharmaceutical services differ from those of the Office of Fair Trading and consumers as general consumers of retail goods and services.

3. The NHS requires value, cost-effectiveness and policy support.

The concerns of the NHS are:

- ensure the taxpayer gets good value from expenditure on pharmaceutical services
- NHS pharmacy services should deliver the best and most cost-effective contribution to primary health care
- ensure that the nature and location of NHS pharmacy services support government objectives.

Competition should be encouraged where it supports achievement of these objectives, but not where it frustrates their achievement.

4. Recognition of pharmacy is developing.

- Appreciation of the potential of community pharmacy to contribute to delivery of primary care services is just beginning.
- The Cabinet Office Regulatory Impact Unit's report "Making a Difference" calculated that transfer of responsibility for repeat prescriptions from GP surgeries to community pharmacy could save 2.74million GP hours.
- In Scotland treatment of minor ailments pilots have been so successful, that the service will soon be offered nationally. It has been estimated that if one quarter of patients who currently consult a GP about minor ailments instead consulted a pharmacist, the NHS could save £380M a year.
- Community Pharmacy has been involved in developing 'Remedies for Success – A Strategy for Pharmacy in Wales' which seeks to develop new services for patients

5. New and better services from pharmacy.

- Community pharmacy leaders have identified new services that can be provided by community pharmacy: the principal services are medication management (required in the Older People's NSF) and treatment of minor ailments.
- Both of these can be brought on stream in short time and can make a visible improvement to patients' experience of primary care services.
- It is envisaged that public health roles will play an increasingly important part in pharmaceutical activity in Wales.

6. Obstruction to developing the services.

- Delivery of these services within a new community pharmacy contract will be delayed or frustrated by changes to the present arrangements for granting contracts.

7. Better competition already in hand.

- Competition already exists in the market for pharmacy services
- Competition will increase with the possible introduction of Local Pharmaceutical Services (LPS).
- There is likely to be very active competition among existing pharmacies for provision of additional services.

8. Adverse impact on LHB service planning.

- The likely impact of de-regulating the market will be the growth of pharmacies in two locations: large out-of-town supermarkets, and in or adjacent to GP surgeries.
- Pharmacies already exist in many such locations, but are balanced by many that are located within residential communities or small shopping parades. The latter are likely to become unviable in substantial numbers as a result of losing custom to new entrants. The changes will not add measurably to patient access; perversely they are likely to diminish access to local amenity services.

Office of Fair Trading Report on Control of Entry Regulations and Retail Pharmacy Services in the UK

KEYPOINT SUMMARY OF PHARMACY ARGUMENTS

9. **Damage to neighbourhood services.**
 - Planning guidance identifies community pharmacy as a valuable neighbourhood resource, and the Social Exclusion Unit has recognised the importance of a pharmacy in supporting a community.
 - It is the small, local neighbourhood pharmacy that is most likely to fall victim to total or near-total deregulation.

10. **Competition that enhances health service planning.**
 - The Welsh Assembly Government must evaluate the extent to which introduction of unrestrained competition in provision of pharmacy services is likely to be detrimental to the development of improved services for NHS patients.
 - It is the NHS interest that must predominate over the non-NHS consumer interest.
 - Where competition can be introduced, or controls relaxed, with no detriment then this should happen.
 - **Increased competition should support local health service planning, not frustrate it.**

More information on the services offered by community pharmacies are available on the PSNC website (via the CPW Link), or alternatively contact the Secretary of your Local Pharmaceutical Committee.



**Community
Pharmacy
Wales**

02920 660 143

www.psn.org.uk