

Health and Social Care Committee Inquiry

Impact of a no-deal Brexit on health and social care

Written evidence submitted by PSNC

October 2018

The Pharmaceutical Services Negotiating Committee (PSNC) promotes and supports the interests of all NHS community pharmacies in England. We are recognised by the Secretary of State for Health as the body that represents NHS pharmacy contractors. We work closely with Local Pharmaceutical Committees to support their role as the local NHS representative organisations.

Our goal is to develop the NHS community pharmacy service, and to enable community pharmacies to offer an increased range of high quality and fully funded services; services that meet the needs of local communities, provide good value for the NHS and deliver excellent health outcomes for patients.

There are 11,619 community pharmacies in England.

Introduction

1. The Pharmaceutical Services Negotiating Committee (PSNC) supports the interests of all NHS community pharmacies in England. PSNC is recognised by the Secretary of State for Health and Social Care as the body that represents NHS community pharmacy contractors.
2. PSNC's goal is to develop the NHS community pharmacy service, to enable community pharmacies to offer an increased range of high quality and fully funded services that meet the needs of their local communities and provide value and good health outcomes for the NHS and the public.

What the impact of a no-deal Brexit is likely to be on their sector of the health and care system (whether that be patients, suppliers to the health and social care system, providers of NHS or social care services, NHS or social care staff, or others).

3. For many patients, particularly those managed in primary care, medicines are the most important intervention offered by the health service. Community pharmacies are responsible for obtaining those medicines and dispensing them to patients; they do so safely and efficiently, ensuring that patients have access to the medicines they need, when they need them. In 2017/18, community pharmacies dispensed more than one billion prescription items.
4. Our primary concern about a no-deal Brexit is the potential impact that this could have on the availability of medicines to patients via community pharmacies. The market in medicines, particularly generic medicines, is global and extremely complex, but any delays to medicines coming across the border into the UK could lead to shortage situations. These are often highly unpredictable and vary in severity in different geographical locations, but they can lead to significantly increased workload for pharmacies, delays for patients, and large increases in medicines prices. Where shortages do occur, stockpiling can further exacerbate the problems. Any delay in getting medicines to patients can cause distress for patients, but in some cases, this could also pose worrying risks to their health. We are particularly concerned about potential delays for medicines that have special storage requirements e.g. they need to be kept below a certain temperature.
5. Pharmacies may also be impacted by a no-deal Brexit from a legislative perspective. The EU Falsified Medicines Directive (FMD) was adopted in 2011 and introduced measures to ensure that medicines in the EU are safe and that trade in medicines is properly controlled. Member states have until 9th February 2019 to implement the final part of the Directive, the 'safety features' of the Delegated Regulation, which will allow the authenticity of medicines to be traced throughout the supply chain using a central database, the FMD hub. After the UK exits the EU, access to the EU FMD hub will depend on the relationship between the UK and the EU. Access is likely to continue during the transition period, but a no-deal Brexit could undermine the time, money and effort that has been put into complying with this legislation by revoking access to this central system.
6. A no-deal Brexit may also impact on the community pharmacy workforce. There could be a shortage of pharmacists due to fewer registrations from Europe and, in the longer term, the attractiveness of the UK as a place for overseas pharmacists to register needs to be considered and a no-deal Brexit may have an adverse effect.

Specifically, what the risks are to patients and to the health and social care system of leaving the European Union without a withdrawal agreement. The Committee would be particularly pleased to hear from patient representative groups about the extent of the potential risk to patient care of any disruption to the supply from the EU-27 to the UK of medicines, medical devices or substances of human origin.

7. As outlined above, the key concern for community pharmacy about a no-deal Brexit is the potential impact this could have on the availability of medicines that are used routinely in patients' care.
8. Many prescription medicines, even those supplied through primary care, are vital, life-saving medicines for patients, such as the regular provision of insulin for people with diabetes. Any delays to the provision of these medicines could have life-threatening consequences.
9. Many people also rely on Over the Counter medicines to control conditions such as allergies. Without the medicines they need, many patients could experience distress or discomfort, and some could see their symptoms worsening leading to higher than usual demand for GP appointments or even hospitalisation.

How effectively stakeholders are planning for the possibility of a no-deal Brexit.

10. Community pharmacies, like all other healthcare providers, have been asked by the Secretary of State to continue with business as usual in the lead up to the UK's exit from the European Union. This includes, specifically, refraining from any activity to build up stockpiles of medicines.
11. Given the significance of the potential impact of a no-deal Brexit on community pharmacies, PSNC has established a community pharmacy Brexit Forum, bringing together the chief executives of organisations from across community pharmacy. The aims of the Forum are to provide a route through which community pharmacy can communicate with the Government to raise any concerns or issues, and to ensure that pharmacies have all the information that they need from the Department of Health and Social Care about Brexit and any implications for them and their patients.

How effectively they consider the Government is planning such an outcome.

12. The Government has set out a scheme to try to ensure a sufficient and seamless supply of medicines in the UK in the event of a no-deal Brexit. The current assumption is to ensure the UK has an additional six weeks supply of medicines in case imports from the EU through certain routes are affected. We understand that the Department of Health and Social Care, who attended the first meeting of the community pharmacy Brexit Forum, are working closely with companies who provide medicines to the NHS, to build up this 6-week stockpile.
13. A 6-week additional stockholding should go some way to providing a buffer stock that can ensure the supply of critical medicines to patient in the event of a no-deal Brexit, but as it is not possible to say what the conditions will be in the event of no-deal Brexit, it is difficult to comment on whether this will be sufficient.

What further planning, or reassurance, are required in order to ensure that the impact of a no-deal Brexit on health and social care would be minimised.

14. There are a number of issues that need to be considered to help assure the efficient supply of medicines to patients. In particular, the Government could consider:

- The competitive market in generic medicines, which over the years has driven down costs for the NHS, may behave differently in a time of crisis, leading to supply issues and an increase in the cost of medicines.
- Community pharmacies need to have the ability to exercise appropriate professional discretion to ensure the continuity of an alternative equivalent medicine to patients, responding to patient need.
- Patient and prescribing behaviour needs to be considered, and reassurances given and measures taken, as appropriate, to ensure stocks remain available for as long as appropriate, to ensure the continuity of supply to patients.
- Additional costs to the community pharmacy sector must be covered and measures need to be taken to ensure community pharmacy has quick and clear reimbursement; there also needs to be appropriate regulatory and practical support to ensure the continuity of medicine supplies to patients from each community pharmacy.
- Issues associated with the Falsified Medicines Directive should be considered, including its importance, its cost and its implementation approximately one month before Brexit.

We are working with the Department of Health and Social Care to assist the Government as it seeks to ensure continuity of medicine supply during the Brexit process.