

**PUBLIC CONSULTATION ON THE VETERINARY MEDICINES REGULATIONS 2013**  
**Royal Pharmaceutical Society response**

The Royal Pharmaceutical Society (RPS) is the professional body for every pharmacist in Great Britain. We are the only body that represents all sectors of pharmacy in Great Britain.

The RPS leads and supports the development of the pharmacy 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.

Its functions and services include:

**Leadership, representation and advocacy:** promoting the status of the pharmacy profession and ensuring that pharmacy's voice is heard by governments, the media and the public.

**Professional development, education and support:** helping pharmacists to advance their careers through professional advancement, career advice and guidance on good practice.

**Professional networking and publications:** creating a series of communication channels to enable pharmacists to discuss areas of common interest.

We thank you for the opportunity to respond to this consultation and we have included our comments below.

**References to membership categories of the Royal Pharmaceutical Society**

The wording in Schedule 2 Part 1 9(1)(a) reflects the Royal Pharmaceutical Society's ongoing involvement in the certification of eligibility for nomination as a qualified person (for manufacture). We request that the wording is revised further to remove "registered as a pharmaceutical chemist" as we are no longer the pharmacy regulator for Great Britain (since 27th September 2010). The wording used should reflect our role as a membership organisation. Where we use the term "member" in our proposed new wording (below) it refers to Royal Pharmaceutical Society membership categories and, as such, should be in lower case.

Our proposed wording is similar to the human legislation (the Human Medicines Regulations 2012 Reg 41(4)(2) includes "is a member of a body"). It is also similar to the wording used for both other membership organisations involved in the scheme (Royal Society of Chemistry and Society of Biology).

Requested change, Schedule 2, Part 1, 9(1)(a), from

***"(a) registered as a pharmaceutical chemist with the Royal Pharmaceutical Society or with the Pharmaceutical Society of Northern Ireland;"***

to our proposed new wording;-

***"a member of the Royal Pharmaceutical Society or with the Pharmaceutical Society of Northern Ireland"***

This requested change has been discussed with John O'Neill and Ravinder Sagoo with our Qualified Persons Officer Rachel Norton.

**VG MN no 20**

We understand that the Misuse of Drugs Regulations 2001 recognise directions which allow a total quantity to be supplied in instalments (instalment direction) and that this is different to the concept of repeat prescriptions which are described in paragraphs 11-13. We would ask that you check these paragraphs and discuss with Home Office colleagues overseeing the misuse of drugs regulations as appropriate.

Hopefully these comments have been helpful.

Kind Regards



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Royal Pharmaceutical Society

*For further information or any queries you may have on our consultation response please contact [consultations@rpharms.com](mailto:consultations@rpharms.com) or the RPS support team on 08452572570*