

Judith Thompson  
Policy, Government and Corporate  
MHRA  
5<sup>th</sup> Floor  
151 Buckingham Palace Road  
London  
SW1W 9SZ

**MLX 381 - PROPOSALS FOR AMENDMENTS TO MEDICINES LEGISLATION TO  
ALLOW SALE OF MEDICINES ON TRAINS AND PLANES**

Dear Ms Thompson,

We write on behalf of the Royal Pharmaceutical Society (RPS) to respond to the above consultation document.

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

The RPS leads and supports the development of the pharmacy profession to deliver excellence of care and service to patients and the public. This includes the advancement of science, practice, education and knowledge in pharmacy and the provision of professional standards and guidance to promote and deliver excellence. In addition, it promotes the profession's policies and views to a range of external stakeholders in a number of different forums.

The RPS does not support the proposal to sell medicines on trains and planes. RPS has a commitment to make Great Britain the safest place to take medicines. We advocate that medicines should only be sold where a pharmacist or other health professional is available to give advice and ensure patient safety.

Medicines are not ordinary items of commerce because they have the potential to cause harm. We recognise the need to balance this with access to medicines and acknowledge that we already have a variety of outlets selling GSL medicines. Sales on planes and trains would therefore not diverge widely from current policy.

However, we advise caution where medicines are being sold as an extra profit making enterprise which has little added patient benefit. Even on long haul plane journeys immediate patient need can be catered for by homely remedies and first aid measures while travelling. We question the need for sales of any medicines in these circumstances, particularly on planes.

The public should be encouraged to take a responsible attitude to their health by purchasing supplies in their own countries before travelling whenever possible and where professional advice is available.

Where GSL medicines are sold without access to professional advice the patient information leaflet is vitally important to ensure patient safety. This is increasingly

important with today's complex medicines regimens and the potential for interactions with many GSL products.

How would the safety of international travellers be assured with UK licensed medicines and patient information leaflets normally available only in English?

If medicines were to be available for sale there would be requirements for safe and secure storage to be considered. Stock control with particular attention to expiry dates is important and correct temperature control must be assured at all times.

Manufacturers take great care to ensure packaging gives protection for normal exposure to heat and humidity with recommended temperature ranges for storage of individual items. General cabin conditions would not pose a problem but care would need to be taken as to where in a cabin items were stored to avoid extremes of heat and humidity, and to ensure temperatures did not exceed the normal range.

In trains there is much less control over temperatures in general and again care would need to be taken with regards to storage in close proximity to equipment releasing heat or moisture.

We hope these comments are useful and would reiterate that medicines are not the same as other categories of retail items. Due caution should be taken in considering the commercial motives and rationale in this proposal versus the perceived patient benefit. Patient safety should be paramount at all times.

Kind regards,

A handwritten signature in cursive script that reads "Aileen Bryson".

Aileen Bryson

Practice and Policy Lead, Scotland  
Royal Pharmaceutical Society.