

**MHRA consultation on codeine linctus
Royal Pharmaceutical Society response**

Do you agree that Codeine Linctus should only be available as a Prescription Only (POM) medicine?

- **Agree**
- Disagree
- Not sure

Please provide any comments or evidence to support your response:

It is our view that Codeine linctus should be reclassified from a P medicine to a POM (prescription only) medicine.

There is a lack of evidence to demonstrate the clinical effectiveness of codeine linctus to relieve a dry cough. Codeine has been used in several double-blind placebo-controlled studies that failed to demonstrate a significant effect of this drug in suppressing cough compared with placebo. There are many other non-codeine based proprietary products on the market for the treatment of dry cough which pharmacists and their teams supply and provide advice on.

In 2010 the UK Commission on Human Medicines advised that over-the-counter liquid medicines that contain codeine should not be used for cough suppression in people under 18, due to increased risks associated with its use. A move from P to POM would support enforcement of this advice.

The RPS is only supporting a P to POM change for this particular product based on the lack of evidence of efficacy, combined with the abuse potential.

Do you agree that the proposal to reclassify to POM would limit the potential for recreational use or use for illegal purposes.

- **Agree**
- Disagree
- Not sure

Please provide any comments or evidence to support your response

The risks of supplying an opiate-based medicine that has limited potential use, outweighs the benefits of enabling this medicine to be sold and supplied from a pharmacy. Many community pharmacies have already decided not to stock this product due to the lack of evidence and the potential for misuse. With studies showing up to 60% of people are genetically predisposed to opioid dependence, the role of codeine linctus in treating what is ultimately a self-limiting condition is questionable.

Do you agree that the proposal to reclassify to POM would help the pharmacist to monitor use in patients who would benefit from the prescription of codeine linctus?

- **Agree**
- **Disagree**
- **Not sure**

Please provide any comments or evidence to support your response

In principle this should make it easier to monitor use of codeine linctus as it will be recorded in GP systems. However, there is a need for all care providers to be able to share information across systems to support patient care, including community pharmacies. We continue to advocate for full read and write access to electronic patient records for all pharmacists, whichever care setting they are working in.

Do you agree that pharmacist training materials would help to educate pharmacists and patients

- **Agree**
- **Disagree**
- **Not sure**

Please provide any comments or evidence to support your response

While pharmacists have continued to manage the supply of this medication, there is evidence patients continue to use the medication incorrectly and outside of product license. Pharmacists and pharmacy teams are trained and well placed to provide help and advice on the appropriate and safe use of P medicines to patients including options for management of dry cough and do so on a daily basis.

Do you think that the proposal could risk impacting people differently, or could impact adversely on any of the protected characteristics (covered by the Public Sector Equality Duty set out in section 149 of the Equality Act 2010 or by section 75 of the Northern Ireland Act 1998)?

- **Yes**
- **No**
- **Not sure**

Please provide any comments or evidence to support your response

For those patients who may require codeine linctus, this reclassification will mean they would need to pay a prescription charge for the product (if they are not exempt). The prescription charge is significantly higher than the cost of buying the product over the counter from a pharmacy. We have long campaigned to remove prescription charges in England because they create a financial barrier to patients receiving the medicines needed to keep them well.

Do you agree that the proposal to reclassify would have little impact on primary care?

- **Agree**
- **Disagree**
- **Not sure**

Please provide any comments or evidence to support your response

We do not anticipate that this change will have a significant impact on primary care. Many pharmacies have already ceased to stock codeine linctus.