

Pwyllgor Newid Hinsawdd, yr Amgylchedda Seilwaith /
Climate Change, Environment and Infrastructure Committee
Bil drafft Diogelu'r Amgylchedd (Cynhyrchion Plastig Untro) (Cymru)/
Draft Environmental Protection (Single-use Plastic Products)(Wales) Bill
SUP_03

Ymateb gan Fferylliaeth Gymunedol Cymru / Evidence from Community Pharmacy
Wales



Community Pharmacy Wales response to the Welsh Government consultation

Reducing Single Use Plastics

Date: September 2022

Part 1: Introduction

Community Pharmacy Wales (CPW) represent community pharmacy on NHS matters and seeks to ensure that the best possible services, provided by pharmacy contractors in Wales, are available through NHS Wales. It is the body recognised by the Welsh Government in accordance with *Sections 83 and 85 National Health Service (Wales) Act 2006* as 'representative of persons providing pharmaceutical services'.

Community Pharmacy Wales are the only organisation that represents every community pharmacy in Wales. It works with Government and its agencies, such as local Health Boards, to protect and develop high quality community pharmacy-based NHS services and to shape the community pharmacy contract and its associated regulations, to achieve the highest standards of public health and the best possible patient outcomes. CPW represent all 710 community pharmacies in Wales. Pharmacies are located in high streets, town centres and villages across Wales as well as in the major metropolitan centres and edge of town retail parks.

In addition to the dispensing of prescriptions, Welsh community pharmacies provide a broad range of patient services on behalf of NHS Wales. These face-to-face NHS Wales services, available from qualified pharmacists and Pharmacy Technicians six and occasionally seven days a week, include, Pharmacist Independent Prescribing Services, contraception services, Discharge Medicines Reviews, Smoking Cessation, Influenza Vaccination, Palliative Care Medicines Supply, Emergency Supply, Substance Misuse and the Common Ailments services.

CPW are pleased to have the opportunity to respond to this important consultation and are fully supportive, following the success of the *Single Use Carrier Bags* legislation, of the Welsh Government's desire to take another step forward in protecting our environment.

From a pharmacy perspective the Welsh Government's willingness to listen to the potential problems, raised by CPW, with the *Single Use Carrier Bag* initiative ensured that the process went smoothly and potential pit falls were avoided.

CPW are hopeful that the same approach can be taken with this follow up initiative.

Part 2: Concerns relating to the proposed single use plastics initiative from a community pharmacy perspective

The fact that the proposals relate only to nine categories has meant that that impact on community pharmacy will be minimal and CPW has limited its response to the issues of concern from a community pharmacy perspective, namely:

Item 2 - cutlery (including knives, forks, spoons, sporks and chopsticks)

Item 5 – straws

Item 9 - oxo-degradable products (plastic products which break down by oxidation into micro-fragments) Examples include carrier bags, agricultural mulch films and, most recently, certain plastic bottles.

Carrier bags

Item 2 – cutlery

We note that plastic spoons are included in the definition of plastic cutlery. In community pharmacies prescribed liquid medicines are supplied with a measuring spoon and many boxes of liquid medicines sold from a pharmacy contain a measuring spoon in the box.

It is therefore essential that there is an exemption for the sale or supply of liquid medicines from a community pharmacy and this is not currently in the draft legislation. This situation will also exist in general retail establishments that sell liquid medicines so Welsh Government may wish to consider a wider exemption.

Item 5 straws

In the guidance document it has been recognised that: *'based on our research, we believe the criteria set out at paragraph 25 above may be met in relation to single use plastic straws which are medical devices/used for medical purposes'*.

Community pharmacies supply thousands of oral nutrition substitutes against a prescription or occasionally as a private sale and some of these will be in tetra packs often with an attached plastic straw. *Exemption 1* in the proposed legislation is extremely helpful and will ensure that these supplies and other supplies of a similar nature can continue from a community pharmacy.

We are aware however that some baby milks may be supplied in single use cartons with an attached straw and whereas the current exemptions will cover their sale through community pharmacies, Welsh Government may wish to add these to their list of exemptions.

Item 9 - oxo-degradable products

Many medicines are repackaged to help patients who have difficulty in using their medicines. Some are supplied in a plastic tray with a plastic film seal and others are repackaged into plastic pouches. CPW are not aware of the details of the plastics used as there are many suppliers and some may well come under this category. It would again be helpful if there was an exemption for any plastic products used in the packaging or re-packaging of medicines.

Carrier bags

While not specifically mentioned in the consultation document, carrier bags are covered in the draft legislation. CPW is pleased to see that the exemptions originally introduced for community pharmacy remain in place and CPW would ask that Welsh Government to ensure that there is no inadvertent change to exemptions that apply to community pharmacy.

Part 3: Conclusion

CPW is fully supportive of the plans by Welsh Government to act to reduce the impact of plastics on the environment and feel that the proposals are both proportionate and practical.

CPW would wish to ensure that the supply of medicines and medicinal products to the people of Wales is not inadvertently impacted as has been highlighted above.

CPW agree that the content of this response can be made public.

CPW welcome communication in either English or Welsh.

For acknowledgement and further Contact:

Russell Goodway
Chief Executive
Community Pharmacy Wales
3rd Floor, Caspian Point 2
Caspian Way
CARDIFF, CF10 4DQ
Tel: 029 2044 2070

