

04 July 2023



Paul Davies MS
Chair of the Economy, Trade, and Rural Affairs Committee, Senedd

By email: paul.davies@senedd.wales

Dear Chair

PRIMARY CARE ELECTRONIC PRESCRIBING SERVICE MOVEMENT OF PRESCRIPTIONS ACROSS BORDERS

Thank you for recently meeting with Community Pharmacy Wales to discuss our concern regarding the movement of prescriptions across the border to England. Below are our concerns that we raised during our meeting.

Although it is feasible, very few Welsh prescriptions are currently dispensed in England, either from England based community pharmacies or England based Distance Selling Pharmacies (DSPs). This is because it would rely on a paper prescription flowing across the border which would require a patient to present the prescription in person or by post to access their services. Unless action is taken by the Welsh Government to prevent it, it will be impossible to retain this position following the introduction of the Electronic Prescription Service in Wales. We are asking for this protection from the Welsh Government to the community pharmacy network in Wales, particularly during the roll-out phase of implementation of the EPS, because of the risk to individual businesses prior to achieving a level playing field.

In England the number of items dispensed by Distance Selling Pharmacies is growing monthly but is currently some 4.5% of the total number of prescription items dispensed in England. Following the introduction of EPS in Wales, there is no reason to believe that the same % of Welsh prescriptions will not be dispensed by DSPs located in England due to the very aggressive marketing campaigns that they currently undertake. We are aware that they intend to increase their marketing activity in Wales immediately following the introduction of EPS and to target GPs located in the pilot sites.

The Wales based GP network operates two separate patient record systems. The Wales based community pharmacy network operates 8 patient management systems and it is intended to roll out EPS to community pharmacies over a fifteen-month period. This means that different areas across Wales will "go live" at different times making it easier for England based DSPs to target those areas. DSPs have existed in England for many years and are very slick and

Chief Executive: Russell Goodway OBE OSTJ

2 Caspian Point, Caspian Way, Cardiff, CF10 4DQ
2 Caspian Pentir, Ffordd Caspian Caerdydd, CF10 4DQ
Tel./Ffon 029 2044 2070
Fax/Ffacs 029 2044 2071
russell.goodway@cpwales.org.uk
www.cpwales.org.uk

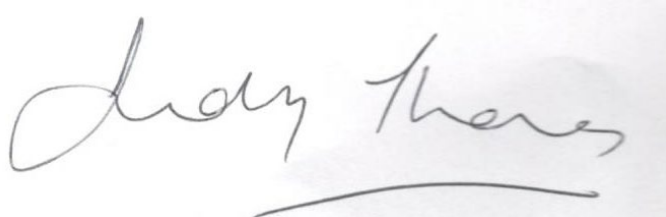
polished at blanketing areas with publicity – they have already been in contact with DHCW and others in Wales to find out more on the Welsh roll-out.

Prescriptions are footfall drivers into community pharmacies – so without prescriptions the pharmacies will have a reduced opportunity to deliver Clinical Services which will then impact on other parts of the NHS. Additionally, community pharmacies are also footfall drivers for the rest of the high street – reduced prescriptions in community pharmacies will result in reduced footfall. It is likely that the loss the lost income associated with the reduction in the number of prescriptions dispensed in Wales, together with the loss of associated retained purchase profit will result in further pharmacy closures. The rate of pharmacy closures in Wales is currently higher than in England where the reduction in the number of pharmacies was expected due to Government funding policy. By the end of August 2023, Wales will have less than 700 pharmacies for the first time in over 15 years with only 699 pharmacies compared to 717 in December 2019 – an overall reduction of 2.5%.

We would be grateful if your committee would reflect on the current proposal as a matter of urgency to ensure that Wales based practices are best protected in the interests of the patient population in Wales.

We would be happy to meet with you again or fellow committee members to discuss our concerns in more detail, if you feel that would be helpful.

Yours sincerely

A handwritten signature in black ink that reads "Judy Thomas". The signature is written in a cursive style and is positioned above a horizontal line that serves as a separator.

JUDY THOMAS
ACTING CHIEF EXECUTIVE