

National Pharmacy Association (NPA) – Written evidence (FUI0022)

To the Subcommittee on the Ireland/ Northern Ireland Protocol,

I am writing to you on behalf of NPA Northern Irish Members in response to the update that was sent to us on the 6th May 2022.

Firstly, may I begin by thanking the committee for sharing the two pieces of correspondence received from the UK Government Ministers.

The NPA is assured in part that work is continuing on reaching a mutually satisfactory conclusion to the discussions between the UK and EU pertaining to the NI Protocol. The impact of medicine supply on the public health must remain of paramount importance within these discussions.

The NPA also supports the UK government proposal of July 2021, that the simplest way to ensure all citizens across the UK could have access to the same medicines at the same time was to remove medicines from the scope of the protocol.

The NPA welcomes the proposals as set out in both letters, but is still concerned around residual issues pertaining to the Falsified Medicines Directive (FMD), and the application of EU law for centrally authorised products (CAP).

As highlighted, Northern Ireland is a small country compared to the rest of the UK, and as already experienced, a number of short-line suppliers have now withdrawn from this market. This could have an adverse impact on availability and price, as well as additional hidden costs to the pharmacy due to the pharmacy staff taking extra time to source alternatives.

Since the application of the Northern Ireland protocol, NPA NI members have also seen a marked reduction in the availability of parallel imports. The alternative versions tend to be more expensive, and as the NI drug tariff is matched to the English counterpart, there does not appear to be any provision to mitigate against this increase in costs.

The NPA welcomes the newly established NI MHRA Approved Route (NIMAR) that has been set up to mitigate against the unavailability of prescription medicines. However, as the number of medicines being supplied through this route increases, the NPA seeks assurance that this process will continue to be responsive to match the current “just in time” mechanism that is currently employed for medicines supply across the UK.

NI NPA members also inform us of shortages pertaining to Over the Counter and Pharmacy Only medicines. This is not only limiting patient choice, but also removing the option of self-care, leading to longer waiting times for GP appointments.

NPA NI members also inform us of the ongoing issues pertaining to FMD compliance. This includes, but is not limited to, the increasing number of false negatives in the system.

Thus, the NPA welcomes the view that until the negotiations are concluded, FMD should not apply in Northern Ireland, particularly as the MHRA is currently working on a UK-wide FMD solution.

The NPA welcomes the pragmatic approach that MHRA and NI Pharmacy Inspectors currently adopt in their inspections and the ongoing co-operation that supports pharmacy owners and their teams to continue to provide optimum patient care to patients in Northern Ireland.

Whilst thanking the House of Lords Committee for its endeavours, the NPA welcomes the opportunity to discuss the points raised in this letter.

Helga Mangion MRPharmS

On behalf of NPA NI members

30 May 2022