

## **Community Pharmacy Lancashire Response to the Pregabalin and Gabapentin Consultation Proposals – To schedule under the misuse of drugs regulations including safe custody.**

### **January 2018**

In November 2017 the home office published a consultation on Pregabalin and Gabapentin because both drugs are considered to present a risk of addiction, potential illegal diversion and medicinal misuse.

The aim of the consultation is to increase the legislative controls on the two drugs and seeks views as to whether and how to do this. The consultation contains three options:

- 1) Control pregabalin and gabapentin as Class C Drugs under the 1971 Act and place both in Schedule 3 to the 2001 Regulations, applying the provisions of the Misuse of Drugs (Safe Custody) Regulations 1973 (the 1973 Regulations)
- 2) Control pregabalin and gabapentin as Class C Drugs under the 1971 Act and place both in Schedule 3 to the 2001 Regulations (but exclude the application of safe custody requirements).
- 3) Control pregabalin and gabapentin as Class C Drugs under the 1971 Act and place both in Part 1 of Schedule 4 to the 2001 Regulations.

After reviewing the impact assessment Community Pharmacy Lancashire believes that it has underestimated the number of these products that community pharmacies have in stock and the volume they occupy.

Furthermore, pharmacies are often space-restricted so the ability to install an additional CD cabinet may not be available. Current stock can be stored both in the dispensary and in stock rooms. This change would require all stock to be stored in the dispensary which may not be physically possible.

We do not object to changing the classification of these products to make them a Schedule 3 drug. However, given the lack of insight in the consultation regarding storage requirements we feel that the only appropriate options available are options 2 & 3.

There is also an operational efficiency cost to the option 1 proposal as, by definition, the CD cabinet is kept locked and will have to be unlocked, stock checked and locked again which all affects the operational efficiency of the pharmacy especially given the large volumes of these items which are dispensed.

Most pharmacies will NOT be able to accommodate the volume of pregabalin and gabapentin in their current CD cabinets, necessitating the purchase of a new cabinet and associated fitting costs to comply with the regulations; this involves significant cost and disruption in the pharmacy.

In addition, it would appear that no consideration has been given to the fact that completed prescriptions will have to be stored in the CD cabinet until collected by the patient which further impacts on the space required.



The above further supports the view that far too little consideration has been given to this proposal and, from a practical point of view, is completely unworkable.

Community Pharmacy Lancashire believes that if option 1 is adopted it will have an impact on wholesalers both in terms of storage and delivery procedures this will in turn have an effect on community pharmacy as the any costs to the wholesaler will be passed on to the community pharmacy through increased drug costs which will also need to be reflected in the drug tariff leading to an inflationary effect on NHS drug costs across community pharmacy and the managed sector which, again, we do not feel has been adequately reflected in the Impact Assessment.

There will also be an impact on prescribers and their software providers who will have to upgrade their knowledge and systems respectively. In addition, there will be a minor effect on pharmacists who may have to refer prescriptions back to the prescriber for amendment if they do not comply with the regulations.

We have no objection to increasing the controls on these drugs to help protect patient and public safety. We have an objection to the safe storage aspect of option 1. Clearly by removing the safe custody requirements option 2 is a more pragmatic approach to the daily works of a community pharmacy.

Therefore, after reviewing the consultation Community Pharmacy Lancashire's preferred option is option 2