

Community Pharmacy Lancashire Gluten Free Consultation Response - Sept 2018

The government has decided to restrict gluten-free prescribing to bread and mixes only, following the March 2017 consultation on the availability of gluten-free foods on NHS prescription.

The consultation provided draft regulations that will allow this and describes what will be done to apply the changes.

Question 1.

Do you think the definitions / descriptions of the products that will be allowed in future are clear and will be understood by prescribers, patients and suppliers?

Yes.

Table 1 within the consultation made it clear which products would be available. Once the list is included in the Drug Tariff this will provide the clarity to prescribers, pharmacists, suppliers and support groups etc. on what mixes and bread products are allowed on an FP10; who will therefore be able to share this new formulary with patients, carers and others. What patient educational literature and support will be provided by the NHS to support this change?

Question 2.

Do you think that the proposed Amendment Regulations as drafted will achieve the desired changes; to provide a staple list of gluten-free breads and mixes to patients on NHS prescription?

Yes.

The available remaining foods will provide a staple list of gluten-free (GF) breads and mixes. As stated in the impact assessment, South Herts highlighted the misconception that coeliac patients routinely used GF flour and that GF baking could only be done by using a mixture of different GF flours with an added gum (e.g. Xanthan gum) to replace the gluten. The staple list with the addition of eggs or milk could suffice for preparation of breads/pizza bases etc.

Question 3.

Do you think the proposed Amendment Regulations will have any unintended consequences?

Don't know.

The impact assessment states there will be no effect to adherence to gluten-free (GF) diets. Patients who have been having a varied diet using the existing formulary may therefore restrict their diet and choose not to buy their GF food as often, or to buy such a wide range. This may have the unintended consequence of restricting and reducing peoples diet leading to unhealthiness or potentially even lower control of their enteropathies. We do not know what the long-term effect on coeliac's from areas with educational barriers to gluten free food preparations, cooking skills and with high economic deprivation, make it hard to judge.