



Response of the National Pharmaceutical Association to Consultation [MLX 313](#)

Thank you for giving the National Pharmaceutical Association (NPA) the opportunity to comment on consultation letter MLX 313 on the proposal for amendments to medicines legislation to allow supply of water for injection by people employed in needle exchange schemes.

The NPA represents the interests of community pharmacies. We have, in voluntary membership, around 11,000 community pharmacies, which comprises the majority of the 12,000 pharmacies in the UK, with the exception of the Boots chain. The NPA provides a representative voice for its members as well as a range of services to help them with both commercial and professional aspects of running their businesses.

Supply of Water for Injection

The NPA welcomes the proposal to amend the POM order so that people working in drug treatment services may also supply WFI to drug users for harm reduction purposes. Many community pharmacists provide a service to drug users and are in contact with patients at the point of supply of their medication, often on a daily basis. We believe that this proposal means that community pharmacists and other workers involved in drug treatment services and needle exchange schemes will be better able to support drug users and aid harm reduction.

Pack size and supply options

In our opinion we believe that it is appropriate for individual ampoules of WFI to be restricted to a maximum volume of 2ml. We would support the Option B supply option. If only pre-packs of WFI are permitted there is the possibility that the supply of WFI may not match the number of needle and syringe sets issued. This may lead to the supply of excess quantities of WFI thus encouraging needle sharing or needle reuse.