



Response to MLX 308

Response of the National Pharmaceutical Association to Consultation [MLX 308](#)

Thank you for giving the National Pharmaceutical Association (NPA) the opportunity to comment on consultation letter MLX 308 on the recommendations of the review of access to the Yellow Card Scheme.

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.

Patient reporting

The NPA welcomes the recommendation that direct patient reporting of suspected adverse drug reactions (ADRs) is to begin. Community pharmacists have a unique role in identifying and reporting ADRs in the community. Pharmacists are in contact with patients at the point of supply of their medication and are often the healthcare professional that patients will consult if they experience an ADR to their medication. Many patient returns of medicines are due to an ADR and the pharmacist has contact with the patient at that point and can advise on the existence of the Scheme. The community pharmacist is able to advise the public on OTC medication and herbal or complementary products which patients may feel are not appropriate to inform their practitioner about. We believe that community pharmacists will be able to support and encourage the public in direct reporting of suspected ADRs for OTC and herbal products as well as prescribed medication.

Strengthening the scheme

In our opinion pharmacists are well placed to raise the profile and awareness of the Yellow Card Scheme amongst the public and are an ideal location for distribution of the Scheme to the public. Pharmacies are an enormous potential source of information and are frequently visited by the public for advice. The community pharmacist is able to inform and support the public in using the Scheme.

Expenses and fees

We would ask for further clarification of the issue of expenses and fees. What expenses does the MHRA consider might be incurred by reporters? We are unable to comment without clarification of this point but we are concerned that financial incentives may lead to inappropriate and unnecessary reporting.