



## **Ref: MLX 351 - Proposals for Amendments to Medicines Legislation to Allow Dispensing Opticians Access to Certain Prescription Only Medicines (POMs)**

24 November, 2008

Thank you for the opportunity to comment on the MHRA consultation on proposals for amendments to medicines Legislation to allow dispensing opticians access to certain prescription only medicines (POMs).

This is a joint response from the Association of British Dispensing Opticians (ABDO), Association of Optometrists (AOP), and The Federation of Ophthalmic and Dispensing Opticians (FODO).

Together ABDO, AOP and FODO represent over 10,000 optometrists, over 5,000 dispensing opticians and optical businesses in the UK who provide high quality and accessible eye care services to the whole population.

We welcome the proposals as outlined in the MLX 351 document and would like to add the following:

- We feel that the proposal to allow registered dispensing opticians to obtain wholesale supplies of the POMs listed in section 9 of the document, for use by optometrists attending their practices, is eminently sensible and that there are sufficient professional safeguards in place to protect the public from any risk, including potential out of date stocks.
- Further, registered dispensing opticians like optometrists, are highly qualified and regulated optical professionals in their own right. We therefore propose that ancillary staff working under their supervision should also be permitted to order wholesale supplies under their direction. The registered professional would of course remain professionally and legally responsible for the actions they were supervising

We would also support the College of Optometrists in the proposal that there should be safeguards in legislation or guidance about who can use such drugs

Those registered dispensing opticians on the GOC Contact Lens Specialty register and so in regulated contact lens practice (Contact Lens Opticians or CLOs) are responsible for a larger proportion of contact lens fittings and aftercare in the UK. To maintain their registration on the Contact Lens Speciality register they are required by the General Optical Council, the professions' regulatory body, to undertake 18 hours of additional Continuing Education and Training in contact lens practice. CLOs routinely fit Rigid Gas Permeable (RGP) lenses and do not use anaesthetics. However, a number of CLOs are also involved in fitting keratoconus patients where occasionally the use of a topical

anaesthetic might be indicated - and are involved with other therapeutic/prosthetic cases where there might be a need for their use.

It is therefore logical, to permit Contact Lens Opticians to use anaesthetics in the fitting of complex keratoconic and prosthetic lens fitting, as outlined in section 10a but, like the College of Optometrists, we would be keen to work with the Department to put in place appropriate guidance and mechanisms to ensure the maintenance of skills through practice. In fact, the optical professional bodies are awaiting the legislation so as to include further guidance on the purchasing and responsibilities regarding the drugs for use by Ophthalmic Medical Practitioners and Optometrists in their professional guidance which sets the professional standards for optical practitioners. They will also be including appropriate advice in the contact lens section of their professional guidance regarding the use of anaesthetics etc.

Under their General Optical Council registration, opticians may only practice within the scope of their competence and must seek advice from colleagues in cases of doubt. As no more than 0.5% of eye drops and 1% of ointment of chloramphenicol are licensed for over the counter sale to patients in pharmacies for the treatment of bacterial conjunctivitis, we also therefore support the proposal that Contact Lens Opticians should be able to use chloramphenicol for the management of bacterial conjunctivitis when necessary.

We hope these comments are helpful, if you have any further comments or queries please feel free to contact us. We are happy for these comments to be made public.

Sincerely,



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