



24 May 2004

Susie Braham  
 Scottish Executive Health Department  
 St Andrew's House  
 1ER  
 Regent Road  
 Edinburgh EH1 3DG

Dear Ms Braham

**Modernising NHS Community Pharmacy in Scotland Consultation Paper**

Members of Borders Local Health Council and its Consultation Panel were invited to comment on the Consultation Paper, and representatives attended a recent consultation forum. The following brief comments are offered on their behalf to inform the consultation process.

Overall, the proposals appear to be sound and carefully drafted. If implemented, they should achieve the intended effect to improve patient care and the health of the public and to better utilise the skills of community pharmacists and their support staff.

There are concerns about:

- the effect on dispensing GPs in rural areas, and indeed the continued viability of services in rural communities;
- 'holding contracts' which could be destabilising to current structures regarding investment/long term planning etc.
- that 'local' pharmacies must not be put at risk by internet provision of services;
- Section 6 - Cross Boundary and Distant Provision - whilst agreeing that it is desirable to have powers which will encourage and allow innovation, it is perhaps necessary to proceed with caution, perhaps with pilot schemes which are monitored and audited over a realistic period.

**Moira Balmer**  
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