



Position Paper on the EU Withdrawal Agreement and the Backstop for Northern Ireland

The Pharmacy Forum NI represents registered pharmacists in Northern Ireland. Our role is to Lead, Promote and Support pharmacists in Northern Ireland. We are an Arm's Length body of the Pharmaceutical Society NI and are the leadership body for all registrants.

General Comments:

It is the view of the Pharmacy Forum NI that a "No Deal" Brexit risks having a significant impact on pharmacy, the wider medical workforce in Northern Ireland and on the delivery of health and social care services to patients in Northern Ireland and the Republic of Ireland.

- **Medicines Supply & Falsified Medicines Directive (FMD)**

We recognise the ongoing contingency planning being undertaken to address the potential consequences of a "No Deal" Brexit on the supply of medicines and specifically, the Human Medicines (Amendment) Regulations 2019 Order, due to come into force on 9th February 2019. However, we remain deeply concerned that a no deal Brexit would compound identified faults in the supply chain, which have already been highlighted by colleagues in England, Scotland, Wales and Northern Ireland. Patient care must remain a priority and major disruption to drug supplies must be avoided. Further, it is not yet possible to fully assess the potential implications on drug costs, of the application of tariffs, consequent to no deal being in place.

We note that the 9th February is also the date on which the Falsified Medicines Directive (FMD) will come in to force. The UK will therefore have access to and from the European Data Hub for a period of just seven weeks before the scheduled date of departure from the EU, on 29th March.

It is difficult to plan investment in systems and governance arrangements to comply with decommissioning requirements across primary and secondary care, without knowledge of the timeframes they are required for, or the extent to which they may be obsolete within a few months, weeks or years. The Government must continue to monitor the financial impact on already hard pressed-budgets across the system and on individual businesses in the community pharmacy sector when insisting on compliance with the new regulation. Also, it is essential for Government to be cognisant of the impact of decommissioning on contingency planning in respect of supply. Additionally, it is essential that steps are taken and processes are in place, to ensure that post Brexit, the United Kingdom does not become susceptible to the supply of counterfeit medicines.

We share the view of the National Pharmacy Association (NPA), expressed in their response to the NI Affairs Committee that any EU withdrawal agreement for Northern Ireland needs to ensure the frictionless movement of goods, to avoid adversely affecting the medicines supply chain. Also, that Brexit is likely to affect the UK's access to EU databases as well as its participation in common development and regulatory frameworks.

- **Border controls and the impact on the health and care workforce**

Recent estimates suggest 30,000 people cross the 500km border between Northern Ireland and the Republic of Ireland every day. Many of these individuals are likely to be medical practitioners who deliver vital care to patients on both sides of the border.

There is a significant risk that a no deal Brexit could have a negative impact on the availability and future staffing of the workforce in Northern Ireland. Any measures which would deter cross border workers from making the daily commute over the border after Brexit would put already pressurised services under even more strain. In this context, the Forum is concerned that Brexit is likely to adversely impact on workforce planning in Northern Ireland and the recruitment and retention of pharmacists. Again, we share the view of the NPA that Brexit has the potential to diminish the UK's attractiveness as a place to study for EU domiciled pharmacy students and its role in life sciences research. This could well have a very significant impact on the numbers of students, particularly from the Republic of Ireland, who will seek to study in Universities in Northern Ireland. This presents longer term issues of viability for our educational establishments and the accreditation of courses.

- **Freedom of movement and mutual recognition of professional qualifications (MRPQ)**

The EU's principle of freedom of movement and the mutual recognition of professional qualifications (MRPQ) has enabled many health professionals from countries within the EU, but especially those from the Republic of Ireland, to practise in Northern Ireland.

It is essential that health and social care providers continue to be able to recruit from the EU, and in particular, from the Republic of Ireland. It is also key that some form of MRPQ is secured, both for existing and future professional qualifications, to ensure EU nationals are able to continue working in Northern Ireland after Brexit.

- **Cross border health services**

Cross border co-operation on health services between Northern Ireland and the Republic of Ireland over the last two decades has enabled a range of high quality specialised services to be delivered on an all island basis, which has benefitted patients on both sides of the border.

Between 2003 and 2015, over €40 million was invested in cross-border health and social care initiatives via Co-operation and Working Together (CAWT), a partnership between the Health and Social Care Services in Northern Ireland and Republic of Ireland, which facilitates cross border collaborative working in health and social care.

It is essential that vital cross-border health projects, which have been funded largely by the EU, are not jeopardized by Brexit. Not only would this be of considerable detriment to patients in Northern Ireland and the Republic of Ireland but it could also hinder Northern Ireland's ability to retain highly skilled healthcare professionals.

We also share the concern expressed by the NPA, in respect of prescriptions. At present an agreement is in place which allows prescriptions to be recognised within each of the European countries. Consequently, patients from the Republic of Ireland and elsewhere within the EU have been able to readily access treatments and medications in Northern Ireland. In the context of the border regions in Northern Ireland, any barrier to accessing pharmacy services following changes to regulations and legislation, could not only have adverse consequences for patient care but also on the viability of community pharmacies in these areas.

Conclusion

As the only region of the UK that shares a border with another EU country, Northern Ireland is in a unique situation and faces unique challenges as the UK leaves the EU. The existing open border arrangement has delivered a range of benefits for patients across Northern Ireland and the Republic of Ireland including the free movement of healthcare professionals and the delivery of health services on an all-island basis. The challenges of Brexit, and in particular, the difficulties of finding a solution to the border issue, as has been evidenced in the recent Brexit negotiations, means that the delivery and staffing of essential health and care services could also come under threat.

We would call for clarity and for these issues to be considered in the context of any further negotiation process.

For further information, please contact:

Gillian Clifford
Pharmacy Forum Policy Advisor

Pharmacy Forum NI
73 University Street
Belfast
BT7 1HL

Tel: 44 (0) 28 90326927
Fax: 44 (0) 28 90439919
E-mail: Gillian.Clifford@psni.org.uk