

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /
Climate Change, Environment and Infrastructure Committee
Bil drafft Diogelu'r Amgylchedd (Cynhyrchion Plastig Untro) (Cymru)/
Draft Environmental Protection (Single-use Plastic Products)(Wales) Bill
SUP_15
Ymateb gan Cymdeithas Fferyllol Frenhinol Cymru / Evidence from Royal Pharmaceutical
Society Wales



Llyr Gruffydd MS
Chair, Climate Change, Environment, and Infrastructure Committee
Senedd Cymru

Consultation: Draft Environmental Protection (Single-use Plastic Products) (Wales) Bill

Annwyl Llyr,

Thank you for this opportunity to comment on this draft bill that is due to be introduced to the Senedd shortly.

As the professional leadership body for pharmacists across all healthcare sectors, the Royal Pharmaceutical Society is wholly supportive of the proposals made in the bill. We are of the view that the proposed single use products listed in the bill to become prohibited for supply or purchase, strikes the right balance between being proportionate, while also demonstrating the required ambition and firm action needed for Wales to meet its net zero targets.

Below you will find some more detailed comments on specific aspects of the bill, as well as some thoughts on options for further reduction of single use plastics within pharmacy and healthcare settings in future years.

Exemption: Straws

While mindful of the importance of sustainability and the need to reduce the use of single use plastics, as health professionals we must prioritise patient safety at all times. We therefore welcome the exemption on the use of plastic straws (page 11) for patients where it is necessary to assist in medication administration. For this purpose, this will allow pharmacists and other health and social care professionals across all settings to supply plastic straws to patients, where it is deemed clinically appropriate (exemptions 1 & 2).

We're equally supportive of exemptions 3 & 4, which together with exemption 2 should ensure that a patient or person who might not be able to consume solid foods (either permanently or temporarily due to

treatment) would be able to use a straw to help consume nourishment. This should be applicable for either in a hospital setting or at home.

Exemption: Plastic Bags

The second sets of exemption of relevance to the pharmacy profession are around carrier bags when “supplied in accordance with a prescription issued by a health professional” or with a “pharmacy medicine (where it is not supplied in accordance with a prescription issued by a health professional”.

While we would encourage pharmacy retailers to always use paper bags or other more environmentally friendly alternatives wherever possible, we do support the exemption to allow plastic bags to be sold/supplied when appropriate. This is based on two factors:

1. Practicality and medicines’ safety:

For those patients who require multiple medicines to be dispensed or purchased over the counter at a pharmacy, paper bags might not be large enough or practical to carry all their medicines safely back to their home. This will particularly be the case if they have been prescribed bulky products such as nutritional feeds. Not having the option of plastic bags to carry their medicines home, might discourage some patients from picking up their medicines which is something we should take all steps to ensure does not happen.

Furthermore, were a bag to break, it may risk medication being damaged or lost. In both cases, this would mean the patient would not fully benefit from the effect of the medicines as envisaged by the health professional who would have prescribed or supplied the medicine. This risk should be mitigated as much as possible, and the use of plastic bags is one way in which this can be achieved.

2. Confidentiality

Again, the risk of paper bags breaking, particularly when damaged by rain, may risk a patient's medication falling out of the bag and risking confidentiality. The principle that a patient must have the option of ensuring that their prescribed or purchased medicine remains confidential to themselves and to only the prescriber and dispenser is all important and cannot be compromised.

Future Developments

Single use plastic is ubiquitous in healthcare and even more so due to the COVID pandemic. In our recently published policy position on pharmacy and sustainability, we called for greater provision of environmentally friendly alternatives for plastics products used for medication use, such as medicine spoons, medicine cups, oral syringes and plastic compliance aids.

At the present such products are not routinely available, however we are hopeful that in the coming years that they will become so. When this is the case, we would encourage the Welsh Government to review regulations so that environmentally friendly alternatives are always used in the first instance within the health service. We do though recognise that this is not within the scope of this legislation.