

To: All Colleagues in Surrey and Sussex LMCs

30 January 2019

Dear Colleagues

**Update: Falsified Medicines Directive (FMD)**

I wrote to all colleagues a few months ago regarding this EU Directive, being implemented on 9 February 2019, and to which the UK Government has indicated the UK will remain aligned should Brexit occur.

I enclose a guidance document from GPC regarding this, and also an update from Matthew Isom, Chief Executive of the Dispensing Doctors Association (DDA), which he has kindly agreed I can distribute. Obviously, the primary impact of the FMD will be in community (and hospital) pharmacies, but dispensing practices (who are being regularly updated by the DDA) and ultimately all GP practices, in relation to, for example, vaccines and personally administered items, may have to comply with the FMD, although full implementation is some way off.

The underlying aim of the FMD is to improve the safety of supplied medicines by enabling 'healthcare providers' [including pharmacies and GP practices] to check the provenance of medicines they receive, via an IT system based on a barcode, prior to provision to patients. This requires a barcode reader and IT software which links with a national registry of supplied medication from manufacturers and allows verification of the supplied stock. In the UK this will be operated by an organisation called SecurMed UK ( <https://www.securmed.org.uk> ).

There will also be a requirement for visibly tamper proof packs. Obviously, there will be a long lead in time, with old stock being available after 9 February and packaging with anti-tamper devices and barcodes only gradually being introduced.

The BMA's position is that any IT equipment and software costs should be reimbursed. Registration with Secure Med UK is free. GP practice IT System-suppliers are gradually planning to introduce functionality and should advise practices as this becomes available.

Across Europe it seems unlikely anyone will be fully compliant by 9 February, and some countries (such as Italy) have agreed a dispensation to implement at a slower pace. Colleagues who want their prejudices reinforced may be interested to know that in France there is a dispute between the Government and pharmacies and none are registered.

The DDA have suggested dispensing practices do now register with SecurMed UK as a 'requestor' but should not proceed with further registration, unless they know their FMD supplier, software and version number. Non-dispensing practices can also register as a 'requestor' but should not proceed further. Unfortunately, at the time of writing, the FAQ section of the SecurMed UK site appears not to be operating.

Local Medical Committees for  
Croydon, Kingston & Richmond, Surrey,  
East Sussex and West Sussex

The White House    T: 01372 389270  
18 Church Road    F: 01372 389271  
Leatherhead  
Surrey KT22 8BB    [www.sslmcs.co.uk](http://www.sslmcs.co.uk)

General Practitioner colleagues should not be anxious about compliance with FMD by 9 February, the Community Pharmacy FMD Working Group has advised Community Pharmacies they are "on a journey towards full implementation" and I would say General Practice is on the same journey, but in the slow lane.

With best wishes

A handwritten signature in black ink, consisting of a stylized 'JP' followed by a long horizontal line extending to the right.

Dr Julius Parker  
Chief Executive

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