



# **SUMMARY OF RESPONSES: HOME OFFICE CONSULTATION ON THE INTRODUCTION OF CHARGES FOR CONTROLLED DRUG AND PRECURSOR CHEMICAL LICENCES**

**OCTOBER 2010**

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# 1. INTRODUCTION

The Government launched a consultation on the 29 March 2010 asking for respondents' views on its proposals to:

- a) re-introduce charges for controlled drug licences
- b) introduce charges for precursor chemical licences, registrations, and authorisations
- c) limit the validity of licences to one year

The consultation document can be seen here:

<http://www.homeoffice.gov.uk/publications/consultations/charges-drug-licensing/>

The purpose of the consultation was to gather as wide a range of views as possible in order to inform the Government's decision making on how best to fund the control regimes for controlled drugs and precursor chemicals.

The Government proposed to introduce fees in order to fund an improved service for licensees, and to protect the public from the harm caused when controlled drugs or precursor chemicals are diverted into the illicit trade. Having carefully considered the consultation responses received, the Government has decided to introduce a revised version of its preferred option – to introduce fees, and to limit the validity of licences to one year.

## 2. CONDUCTING THE CONSULTATION EXERCISE

The consultation document was published on the Home Office website alongside an impact assessment of the policy. An invitation to respond was sent to all licensees for whom the Home Office held contact details. An invitation to respond was also sent to selected trade bodies and other interested parties in fields affected by drugs and precursor chemical licensing (e.g. Higher Education Funding councils).

On occasion, informal consultations also took place when Home Office officials met with licensees as part of normal business.

91 responses were received. A full list of respondents can be found in Annex 1 at the end of this document. The sectors from which responses were received can be seen in the section on 'Question 1' on page 9 below.

## 3. KEY FINDINGS

Some key themes emerged from the consultation responses received:

- willingness to pay a fee in return for clearly defined improvements in service
- concern at the increased regulatory burden on business caused by fees
- concern at the increased administrative burden on business caused by the need to renew licences on a regular basis
- impact of fees on small or medium sized enterprises (SMEs)
- compliance activity should be conducted on a risk-assessed basis
- desire to ensure that compliant licensees did not pay for the extra work required to deal with less compliant licensees
- impact of fees upon non-commercial licensees (e.g. museums, higher education sector)
- impact of fees upon users of small amounts of controlled substances

- suggestions that the licensing system should be funded by the general taxpayer

The Government response to these issues is set out below.

## **Fees in return for clearly defined improvements in service**

The Government is committed to providing an improved service when licence fee revenue allows investment in the Home Office Drugs Licensing and Compliance Unit. Respondents were particularly keen to see improved turn-around times for their licence applications. The Home Office will therefore focus resources on this area. There is clearly a significant benefit for business if licence turn-around times can be kept consistent and short.

## **Regulatory burden caused by fees**

Respondents were concerned about the extra cost that fees would introduce for their business.

Under the previous fees regime, the revenue raised went directly to the Treasury. Under the new fees regime the revenue will be retained by the Home Office and invested into the Drugs Licensing function. The Government is keen to ensure that licensees paying fees see an improved service in return. In the current economic climate, where all Government budgets are under pressure, there is a high risk that the quality of service available to licensees will decline unless fees revenue can be used to fund the service.

## **Administrative burden**

Respondents were concerned that the licence renewal process, and the payment of fees, would increase the administrative burden they face.

There will be an increase in the administrative burden when fees come into effect. The Home Office has worked closely with the Better Regulation Executive to keep the administrative burden to a minimum. For controlled drug licensees, the Home Office will look to roll-up the existing 'Annual Statement of Compliance' with the renewal application form to avoid duplication. There will be a review two years after annual licence renewals come into effect to consider the case for extending the validity of all licences and registrations to 2 years, as this offers the potential to reduce the admin burden. The benefit of reducing the admin burden will have to be carefully weighed against the reduced level of oversight of compliance.

## **Impact upon small- and medium-sized enterprises (SMEs)**

SMEs expressed concern that the burden of fees fell disproportionately heavily on them, as they had fewer resources to absorb the cost of fees. Some respondents suggested amendments to the proposed fees model to either exempt SMEs from fees entirely, or to link the amount paid in some way to the revenue or turnover of the business.

Fees are calculated on the basis of the amount of Home Office resource that is absorbed in processing each type of licence, registration, or authorisation. The size of the business does not determine the amount of resource absorbed in processing a licence. The two most significant factors are the type of licence (as the compliance standards that must be checked are different for different types of licence and registration) and the level of compliance of the applicant. For this reason, the Government does not support the idea that small- and medium-sized enterprises should pay a reduced fee.

The Home Office is exploring flexible payment options to help small businesses with cash flow problems.

## **Compliance activity should be conducted on a risk-assessed basis *and* Compliant licensees should not pay for the extra work required to deal with less-compliant licensees**

Licensees expressed a concern that fees would lead to compliant licensees effectively cross subsidising the non-compliant licensees who require extra compliance visits, or who absorb greater levels of Home Office resources in other ways.

The Government sympathises with this view. It is keen to construct a licensing regime that incentivises compliance and disincentivises non-compliance. It does not want cross subsidies within the licensing system. For these reasons, the fee structure has been amended to differentiate, at the licence renewals stage, between higher- and lower-risk licensees. For fully compliant licensees who pose a low risk of diversion there will be a 'light touch' licence renewals process whereby the application will be cleared on the papers alone. The fee will be correspondingly low. The renewals application process for higher risk, or less compliant licensees, will include a compliance visit. The fee for the renewal will be correspondingly higher. This approach will ensure that compliant, low-risk licensees are not cross-subsidising the extra compliance visits required for higher risk licensees, and that Home Office resources are targeted on higher-risk areas. Compliance visits during the lifetime of a licence, which take place outside the licence renewal process, will continue to be funded from the Home Office budget.

## **Impact upon non-commercial establishments**

Respondents in sectors who did not use controlled substances for commercial purposes – in particular, the museum and higher education sectors – thought that they should be exempted from fees, as they could not rely on profits made from trading controlled substances to cover the costs of the fees.

Fees are calculated on the basis of the amount of Home Office resource absorbed in processing a licence. Licences for non-commercial organisations absorb the same amount of resource as licences for commercial organisations. If non-commercial establishments are to receive their licences for free, those licences must either: (a) be paid for by cross subsidy from other licensees; or (b) be paid for by a public subsidy from the general taxpayer. HM Treasury guidance (*Managing Public Money*) states that cross subsidies are not good practice as they may foster inefficient or wasteful patterns of consumption. Further, there is no reason why licensees conducting profit-making business should pay for the licences of non-commercial licensees. The alternative would be for the general taxpayer to pay for licences for non-commercial licensees. The Government does not support this approach. It considers it right that those who use licenses should pay for them, not the general taxpayer. This principle underpins fees policy as a whole.

It should be noted that universities are, in any case, subject to some exclusions for controlled drugs licensing. University research departments, under the Misuse of Drugs Regulations 2001, do not require licences to possess and supply drugs in Schedules 2, 3, 4 Part I, 4 Part II and Schedule 5. These arrangements will be unaffected by the introduction of fees.

## **Impact upon licensees who are users of small amounts of controlled substances**

Respondents suggested that the fee should take account of the amount of controlled substances held. They argued that drugs held in very small quantities posed less risk than those held in much higher quantities by other licensees.

The Government response to this issue is much the same as its response to requests for exemptions for small business. The fee level is determined by the amount of Home Office resource that is absorbed in processing each type of licence, registration, or authorisation. The volume of controlled substances held does not determine the amount of resource absorbed in processing a licence application. The two most significant factors are the type of licence (as the compliance standards that must be checked are different for different types of licence and registration) and the level of compliance of the applicant. For this reason, the Government does not support the suggestion that licensees who hold small amounts of controlled substances should pay a reduced fee.

The risk-assessment of licensees will be undertaken on a case-by-case basis. The quantity of controlled substances held will be one factor that is taken account of in the risk assessment process.

## **The licensing system should be funded by the general taxpayer**

Some respondents suggested that because the purpose of the licensing regimes for controlled substances is to protect the wider public, the general taxpayer should pay. The Government position is that it is right that those who directly benefit from the licensing regime should pay for its upkeep. Enforcement costs are not included in the fees regime – if a licensee is found to be breaking the law the case is not dealt with by DLCU, but is passed to the Police and/or SOCA, and is thus paid for by the general taxpayer. Compliance visits that are not directly related to the issuing of a licence will also be paid for by the general taxpayer.

## **4. THE GOVERNMENT'S POLICY DECISION FOLLOWING THE CONSULTATION**

The Government set out the rationale for fees, and its preferred option, in its March 2010 consultation document. Having analysed the consultation responses received, the Government has decided to introduce fees and limit the validity of licences to one year. In light of consultation responses the Government has made some amendments to its original proposals.

- Consultation respondents told us that compliance activity should be risk-assessed, and that compliant licensees should not pay to cover the extra costs associated with less-compliant licensees.
- In response, the Government has amended its preferred option to introduce a risk-assessed licence renewals process. Licence renewal applications for higher risk licensees, which require a compliance visit, will be charged at a higher rate than renewals for lower risk licensees. This will ensure that compliant licensees will not pay for the higher costs incurred by less-compliant licensees.
- Licence renewal fees for compliant licensees are set at a rate to reflect the 'light touch' renewals process, keeping annual fees for licensees to a minimum.

- Consultation respondents voiced concerns about the administrative burden of annual renewals. The licence renewal application process will be made as 'light touch' as possible for compliant licensees.
- Consultation respondents told us how important application turn-around times were for them. Fees revenue will be invested to focus on driving down turn-around time for licences.

Further details of the policy, and alternative options considered, can be found in the updated Impact Assessment for this policy which is published on the Home Office website.

## **Policy – controlled drugs**

The Government intends to re-introduce fees on 15 November 2010. The existing 1986 Fees Regulations will be revoked. Fees will apply to:

- Licences to possess controlled drugs
- Licences to supply, or offer to supply controlled drugs
- Licences to produce preparations containing controlled drugs
- Licences to produce controlled drugs
- Licences to cultivate cannabis
- Licences to cultivate cannabis with a tetrahydrocannabinol (THC) content not exceeding 0.2% (sometimes known as 'hemp licences')
- Import licences
- Export licences

Domestic licences issued from 15 November onwards will have a validity of one year. The existing stock of open-ended licences will be replaced over the coming year. The Home Office will contact licensees to revoke the existing open-ended licence and invite licensees to apply for a new licence with a validity of one year.

Applications to renew a licence that has expired will attract a fee (at a substantially lower rate than the fee for a new licence). The licences issued to replace a revoked open-ended licence will be treated as a renewal rather than as an application for a new licence.

There will be two types of renewal application:

- A paper-based renewal process for compliant, low-risk licensees.
- A renewal process that includes a compliance visit for less compliant or higher-risk licensees.

The fee for a paper-based renewal process will be significantly lower than the fee for a renewal application that includes a compliance visit.

If changes are required to an existing licence (for example, a change of business name, or change of address) the application will be treated as a renewal.

Licences issued to replace a lost or damaged licence will attract an administrative fee.

Domestic licence fees will be invoiced at point of application. The licence will not be issued if payment is not received.

Import and export licence fees will be invoiced in arrears, on a quarterly basis. If payment for the previous quarter is not received future import and export licence

applications will be suspended until payment is received. Unpaid fees may be pursued through legal action.

## **Policy – precursor chemicals**

The Government intends to introduce fees on 1 November 2010. Fees will apply to:

- Category 1 precursor chemical licences
- Category 2 precursor chemical registrations
- Category 3 precursor chemical registrations
- Import authorisations
- Export authorisations

Category 1 licences and category 2 or 3 registrations issued from 1 November onwards will have a validity of one year. Any open-ended category 1 licences or category 2 or 3 registrations will be replaced over the coming year. The Home Office will contact licensees/registrants to revoke the existing open-ended licence or registration and invite licensees/registrants to apply for a new licence or registration with a validity of one year.

Applications to renew a licence or registration that has expired will attract a fee (at a substantially lower rate than the fee for a new licence). The licence/registration issued to replace a revoked open-ended licence/registration will be treated as a renewal rather than as a new application.

There will be two types of renewal application:

- A paper-based renewal process for compliant, low-risk licensees.
- A renewal process that includes a compliance visit for less compliant or higher-risk licensees.

The fee for a paper-based renewal process will be significantly lower than the fee for a renewal application that includes a compliance visit.

If changes are required to an existing licence or registration (for example, a change of business name, or change of address) the application will be treated as a renewal.

Licence or registration documents issued to replace a lost or damaged licence or registration will attract an administrative fee.

Category 1 licence and category 2/3 registration fees will be invoiced at point of application. The licence or registration will not be issued if payment is not received.

Import and export authorisation fees will be invoiced in arrears, on a quarterly basis. If payment for the previous quarter is not received future import and export authorisation applications will be suspended until payment is received. Unpaid fees may be pursued through legal action.



## Fee levels

Fees for 2010/11 have been set at the levels in the tables below:

### Controlled drugs:

Service	Fee (£)
Licence to possess controlled drugs	3,133
Licence to supply controlled drugs	3,655
Licence to produce preparations containing controlled drugs	4,178
Licence to produce controlled drugs	4,700
Licence to cultivate cannabis	4,700
Licence to cultivate cannabis with a THC content not exceeding 0.2%	580
To renew a licence (all types) – no compliance visit required	326
To renew a licence (all types) – including a compliance visit	1,371
Import licence	24
Export licence	24
To replace a lost or damaged licence	45

### Precursor chemicals:

Service	Fee (£)
Category 1 precursor chemical licence	3,655
Category 2 precursor chemical registration	435
Category 3 precursor chemical registration	435
To renew a cat.1 licence – no compliance visit required	326
To renew a cat.1 licence – including a compliance visit	1,371
To renew a cat.2/3 registration – no compliance visit required	109
To renew a cat.2/3 registration – including a compliance visit	1,153
Import authorisation	24
Export authorisation	24
To replace a lost or damaged licence or registration	45

The impact of fees will be reviewed after one year (in November 2011). Fee levels will be reviewed on an annual basis by the Home Office, working with officials from HM Treasury. The final decision on fee levels will be taken by a Home Office minister.

## 5. SUMMARY OF RESPONSES AND GOVERNMENT RESPONSES TO THESE

A summary of responses to each of the questions in Section 5 of the consultation document is provided below, along with a Government response to these where appropriate. Many applicants did not answer all questions.

### Question 1: In which sector(s) do you operate

Those who responded to this question operate in the following sectors:

Sector	No. of respondents
Doctor's deputising service	0
Drug detection dogs	4
Education	6
Exporter	19

Forensic/Toxicology service	5
Healthcare	8
Importer	18
Manufacture – pharmaceuticals	12
Manufacture – other	7
Private hospital/Treatment Centre/Clinic	2
Product packaging/labelling	7
Research and Development	19
Trade body	0
Waste disposal	0
Wholesaler – pharmaceuticals	14
Wholesaler – other	2
Wholesaler – veterinary	4

N.B. Many respondents operate in multiple sectors so the numbers in this table do not total the number of respondents (91)

Responses were also received from the following sectors:

Air ambulance  
Clinical trials  
Manufacture – chemicals  
Manufacture – flavourings  
Manufacture – fragrances  
Mountain Rescue  
Museum collections and research  
Professional bodies  
Racecourses  
Third party logistics  
Trade associations  
Universities

**Question 2: If you are a small or medium enterprise (SME – a business that employs 250 people or fewer) do you think the Government’s preferred option would have a disproportionate impact on businesses like yours?**

33 SME respondents (36% of all respondents) thought that there would be a disproportionate impact.

**Please give reasons for your view and suggest alternative approaches that will better meet the needs of SMEs**

Suggestions received, and the Government response to them, are covered in the ‘Key Findings’ section above.

**Question 3: If you are responding on behalf of a university or other education institution, do you think the Government’s preferred option would have a disproportionate impact on your sector?**

Six Higher Education Institutions thought that there would be disproportionate impact.

## **Please give reasons for your view and suggest alternative approaches that will better meet the needs of the education sector**

Suggestions received, and the Government response to them, are covered in the 'Key Findings' section above.

### **Question 4: Which licences do you possess?**

8 respondents held precursor chemical licences only.

40 respondents held controlled drug licences only.

18 respondents held both precursor chemical and controlled drug licences.

### **Question 5: Do you use import and/or export licenses?**

36 respondents use import and/or export licences or authorisations.

### **Question 6: Which option do you prefer?**

<b>Option</b>	<b>No of respondents who preferred it</b>	<b>% of all respondents</b>
Option 1	40	44
Option 2a	9	10
Option 2b	16	18
Option 3	2	2

Option 1 (the 'do nothing', no change option) was the most popular amongst respondents, because it would not introduce any additional fees or administrative burden for licensees. Since the consultation document was drafted it has become clear that this option would be unlikely to result in a continuation of the status quo. The Home Office budget is expected to be significantly reduced over the next four years. This will create pressure on all services funded through the Home Office budget, and it is very likely that Drugs Licensing will see a reduction in its resources if fees revenue is not available. There is a high risk that this would lead to a degradation in the quality of services available to licensees and an increased risk of diversion.

Of the options for charging, the most popular was option 2b, for charges to apply to all licences, registrations, and authorisations, with licences and registrations valid for 2 years. This was popular on the grounds that it would lead to a lower administrative burden than would an annual renewal process. The Home Office is mindful of the administrative burden licence renewals will create and is working to make the renewal process for compliant, low-risk licensees as 'light touch' as it can be whilst remaining consistent with our international and legal obligations to protect the public from the harm caused by the diversion of controlled substances.

Licence renewals will initially be on an annual basis. This will allow the Home Office to get a good appreciation of the level of risk. At the end of the two years the duration of licences will be reviewed, with an assessment of whether licences of two years duration could be introduced without significantly increasing the risk of diversion. A further option to be considered would be to introduce licences of longer duration for low risk licensees, and licences of one year's duration for new, unknown, licensees, or higher-risk licensees.

**Question 7: Do you think the Government can achieve its aims through any alternative, non-regulatory solutions?  
Please suggest alternative approaches**

Some of the suggestions received in answer to this question are considered in the 'Key Findings' section above. Those suggested non-regulatory solutions not included elsewhere in this document are shown in the table below, with the Government response alongside:

<b>Suggestion</b>	<b>Government Response</b>
Funds seized through drug related crime may be an alternative source of revenue.	The Government seizes the proceeds of crime under the Proceeds of Crime Act 2002. SOCA is the lead agency in this work. Due to the lengthy legal process involved in seizing the proceeds of crime it costs SOCA, according to its own estimate, £1 for every £1 it seizes. Seizing criminal assets does not, therefore, offer a source of funding for the Home Office Drugs Licensing and Compliance Unit.
Better co-ordination between SOCA and the Home Office in speculative licence applications, as well as good communication on new trends in legal highs will allow the government to achieve its aims	The Home Office works closely with SOCA as a matter of routine in considering precursor chemical applications. Controlled drug licence applications are referred to local police forces where appropriate. Enhanced disclosure CRB checks are required for all new applicants. The Government currently informs the public about new substances coming under control through the Home Office website and press releases. The Home Office would welcome feedback from licensees about more effective ways to communicate this information. Neither of these approaches allows the Government to achieve its aims of improving services for licensees and further reducing the risk of diversion.
Improving border control and ports and airports to prevent the smuggling of controlled drugs into the UK.	Whilst border control is clearly central to tackling the smuggling of controlled drugs into the UK, it does not address the problem of the diversion of controlled substances from the licit trade into the illicit trade.
The current system is sufficient and effective and no more regulation is required	The Home Office's review of licensing in 2008 revealed that the existing licensing system could be improved to further reduce the risk of diversion, and that licensees desired improved service from the Home Office
Self-regulation for companies and suppliers.	The UK has international obligations under the relevant United Nations Conventions to regulate the handling of

	<p>controlled substances. Self-regulation alone would not provide an effective level of protection against the risk of diversion. The Home Office review in 2008/9 showed that lower-levels of regulation in this area created real risks of diversion.</p>
<p>Regulation for all end users across all member states of the EU should be standardised in order to minimise the admin burden.</p>	<p>Regulation for precursor chemicals is already standardised across the EU, since the legislative framework is set by directly effective EC regulations.</p>
<p>The Government could combine this Home Office function with that of the Medicines and Healthcare products Regulatory Authority (MHRA) as the MHRA's Good Manufacturing Practice (GMP) certification and security compliance are very similar processes.</p> <p>The Home Office should harmonise with the MHRA, especially on compliance visits, as duplication exists. Compliance with MHRA rules of Good Distribution Practice fulfils the criteria for Home Office compliance.</p>	<p>In 2004/5 the Home Office and the MHRA worked together to examine what areas of overlap existed, and if it would be possible to combine some or all of their functions. When considered in detail, it was found that the areas of overlap were not sufficient for any of their functions to be combined. The Home Office and MHRA work closely together and if, as practices change over time, the level of overlap increased this could be re-examined.</p> <p>Compliance with MHRA requirements will be one factor used in the risk-assessment of licensees.</p>
<p>The proper use of licences could be included in the regular assessment of forensic science providers by the Forensic Science Regulator.</p>	<p>The office of the Forensic Science Regulator has confirmed to the Drugs Licensing and Compliance Unit that his remit does not cover controlled drugs. The Government will explore how the information provided to the Forensic Science Regulator could be used to inform the Drugs Licensing and Compliance Unit's risk-assessment of forensic science licensees.</p>
<p>Arranging seminars to spread best practice between groups of similar licence holders and site visits by advisors rather than inspectors are likely to be at least as beneficial.</p>	<p>The Government welcomes the suggestion of best-practice seminars for groups of similar licensees. The Home Office already offers this service when requested, as it has been in the past by various trade bodies and umbrella organisations. The Home Office will develop plans to offer these seminars more widely in the future.</p> <p>Compliance Officers already have an advisory role, and the Government intends to strengthen this aspect of their work, and make their advice more readily available, by properly resourcing this function.</p>

**Question 8: What impact do you think re-introducing charges for licenses will have on government efforts to reduce the risk of harm caused by the illegal drug trade?**

Impact	No of respondents choosing this option	% of all respondents
Positive	8	9
Negative	12	13
Neutral	41	45

**Question 9: What impact do you believe re-introducing charges for licences will have on your business or organisation?**

Impact	No of respondents choosing this option	% of all respondents
Positive	0	0
Negative	56	62
Neutral	10	11

**Question 10: Do you agree with the proposal to limit the duration of licences as described at paragraph 3.1.1?**

- 35 respondents (38%) agreed with the proposal to limit the duration of licences
- 28 respondents (31%) disagreed with the proposal to limit the duration of licences

**Question 11: If charges are re-introduced, what payment method would you prefer?**

Payment method	No of respondents choosing this option	% of all respondents
online	26	29
BACS	7	8
cheque	17	19
telephone	3	3

Fees will be collected by the Home Office Shared Service Centre (SSC). The SSC can accept payment by:

- BACS/CHAPS
- Cheque
- Debit/credit card

Part of the purpose of this question was to gauge the level of interest in an online payment system, which is not available at present. The Home Office could introduce online payments if it invested money in this service. Whilst online payment was the most popular of the methods offered, the level of response was not sufficient to justify investment at this time. The Home Office will review the effectiveness of its fee collection processes as part of its annual review of fees.

## Question 12: Which approach to charging for import and export licences would you prefer?

Point at which import/export fees should be charged	No of respondents choosing this option	% of all respondents
At application	14	15
On account	26	29

Following this response from licensees, the Home Office intends to charge fees for controlled drug import/export licences, and precursor chemical import/export authorisations, in arrears, on a quarterly basis. Due to the high volume of import/exports licences and authorisations processed, it would be impractical to take payment for each individual licence or authorisation at the point of application.

## Question 13: Administrative burdens

Many licensees provided estimates of the administrative burden. These estimates have been incorporated into the updated impact assessment produced for this policy.

## Question 14: Equality Impact Assessment

No respondent considered the policy to have any equality impact.

## ANNEX 1: LIST OF RESPONDENTS

AD Allen Pharma Ltd  
Aesica Pharmaceuticals Ltd  
Air Med  
Alliance Healthcare  
Almac Pharma Services  
Animal Care Ltd  
Aptuit  
Arena Pharmaceuticals  
Association of Anaesthetists of GB and NI  
BioFocus  
Boehringer Ingelheim Limited  
BP Chemicals  
The Brian Smyth Company  
British Essence Manufacturers' Association  
The British Museum  
Butterworth Laboratories Ltd  
Cardiff Bioanalytical Services Ltd  
Catalent  
Catalent Pharma Solutions  
Catalent UK Swindon Zydis  
Chemical Business Association  
Chemical Industries Association  
Claremont Ingredients Ltd  
Courtin and Warner Ltd  
Craig and Hayward Ltd  
D.M. Wood Medical Ltd  
Devonshire Healthcare Services Ltd  
DiaMatrix Ltd  
Dr Derek Wilson  
Durbin PLC  
Eisai Europe Limited  
ELMS  
Essential Nutrition Ltd  
Exova  
Exploration Logistics plc  
Fisher Scientific UK  
Forum Products Ltd  
GW Pharmaceuticals  
H.E. Stringer Flavours Ltd  
Hexham Steeplechase Company Ltd  
Interpharm Ltd  
IOTA Nano Solutions  
Kent Scientific Services  
Key Forensic Services Ltd  
Key Organics Ltd  
LGC Standards  
London Museums of Health and Medicine  
Macfarlan Smith Ltd  
Magnum Freshtime Ltd  
Manchester Organics Ltd  
Mass Spec Analytical Ltd



Merck Serono  
Mountain Rescue England and Wales  
Movianto UK  
Mr Ray Turner  
Mundipharma Research Limited  
The Napp Pharmaceutical group of companies  
Newcastle Racecourse  
NorthStaffs Combined Healthcare NHS Trust  
NorthWest Ambulance Service NHS Trust  
Paion UK Limited  
Pathway Intermediates Limited  
Peakdale Molecular Ltd  
Professor Paul Flecknell  
Prosidion  
ProSynth Ltd  
Quay Pharmaceuticals Ltd  
The Racecourse Association Ltd  
Ray Turner  
Robinson Brothers Ltd  
The Royal College of Surgeons of England  
The Royal Pharmaceutical Society of Great Britain  
RSSL  
SAFC Pharma  
Salford Royal NHS Foundation Trust Laboratory  
School of Pharmacy, De Montfort University  
Selective Antibodies Ltd  
Serco Health  
Sigma-Aldrich  
Sun Court Nursing Home  
SureScreen Diagnostics Ltd  
Symrise Ltd  
Tyler Security  
University of Abertay, Dundee  
University of East Anglia  
University of Strathclyde  
Wells Offshore

7 further responses were submitted anonymously.