



## ANNEX 1

### Response document for MHRA public consultation on the proposal to make Acnecide Face Gel and Acnecide Face Wash available from general sales outlets without prescription

Ref: ARM 98

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#### Your details

Name: [REDACTED]

Position (if applicable): Public Affairs Officer

Organisation (if applicable): Community Pharmacy Scotland

Email: [REDACTED]

**1. Do you consider that Acnecide Face Gel and Acnecide Face Wash should be available as General Sale List (GSL) medicines?**

Yes ☐      No ☒      Not sure ☐

Please provide any comments or evidence to support your response:

Acnecide Face Gel and Acnecide Face Wash should remain a P (Pharmacy only) medicine to ensure that acne sufferers always have contact with trained staff and the opportunity to speak to a professional regarding their condition.

Acne can have a severe psychological impact on an individual's mental health and so initial and regular interaction with a health professional would provide an opportunity for this to be spoken about and for signposting to other services to take place if necessary.

A crucial part of treatment with acne products is expectation management. Individuals may not see an improvement quickly and those who do see success only see it from sticking rigidly to the instructions over a period of months. In our opinion, it is also unlikely that many suffering acne will be able to distinguish the degree of their condition, nor will they necessarily abide by the product's intended indication. Without trained staff to discuss these issues with, acne sufferers may give up on a product that could have helped them as well as missing out on the support they may need with their condition and any associated mental health concerns.

Pharmacists are trained to spot signs of mental health issues, and this is a key concern with those suffering from acne. Even mild and moderate forms of the condition can lead to severe distress and behaviour change, which can require referral to appropriate services. The opportunity to make an intervention will be lost in settings without trained staff available, and we are of the opinion that the distribution of community pharmacies along with online pharmacies (which have safeguards built in for the safe supply of P medicines) provides the vast majority of the population with access to these medications.

**2. Do you have any specific comments on the leaflets or the labels provided in the public reclassification report for Acnecide Face Gel and Acnecide Face Wash?**

The outer box provides an image of mild acne but does not provide comparator images for moderate and severe acne, nor does it suggest what the consumer should do if their condition appears to be worse than mild acne. These would be essential to help those with the latter two conditions determine the best care pathway for themselves.

**3. Do you have any other comments on the reclassification?**

No.

**4. The MHRA may publish consultation responses. Do you want your response to remain confidential?**

Yes ☐

Partially\* ☐

No ☒

\*If partially, please indicate which parts you wish to remain confidential. In line with the Freedom of Information Act 2000, if we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. Responses to consultation will not normally be released under FOI until the regulatory process is complete.

Responses can be continued onto a separate page if required. This form should be returned by email ([reclassification@mhra.gov.uk](mailto:reclassification@mhra.gov.uk)) to arrive by **30 May 2019**. Contributions received after that date cannot be included in the exercise.