

## Response to the January 2018 Department of Health and Social Care Report Following the Public Consultation on Gluten Free (GF) Prescribing: Availability of Gluten Free Prescribing in Primary Care<sup>1</sup>

### **Background:**

The Department of Health launched a public consultation to consider the availability of gluten free (GF) prescribing in primary care on 31st March 2017 and was open for submission of responses until 22nd June 2017. The consultation sought views on three options:

Option 1: Make no changes to the National Health Service (General Medical Services Contracts) (Prescription of Drugs etc.) Regulations 2004.

Option 2: To add all GF foods to Schedule 1 of the above regulations to end the prescribing of GF foods in primary care.

Option 3: To only allow the prescribing of certain GF foods in primary care, by amending Schedule 1 of the above regulations.

The consultation closed on 22<sup>nd</sup> June 2017 and the report of responses<sup>1</sup> was published in January 2018 and indicates that:

- The Health Minister's preferred option is option 3: to restrict prescribing to certain GF products. This is likely to result in retaining a smaller range of bread and mixes as the preferred product types following the consultation.
- Implementing changes to the availability of GF foods requires the amendment of Schedule 1 to the National Health Service (General Medical Services Contracts) (Prescription of Drugs etc.) Regulations 2004, and the amendment of the list of approved GF products in Part XV of the Drug Tariff. GF foods from the following categories will no longer be available for prescribing: biscuits, cereals, cooking aids, grains/flours and pasta.

### **Commissioning Alliance (South Place) current position:**

The current BHCCG Medicines Management Guidelines for the prescription of GF products were published in April 2015.

<https://www.gp.brightonandhoveccg.nhs.uk/file/637>

Only bread and flours (and xanthan gum) are included in the Joint Formulary. Flour / bread mixes are not included (see table 1). This differs from the Health Minister's preferred option of retaining "breads and mixes".

| FORMULARY APPROVED GLUTEN FREE PRODUCTS  |   |
|--|---|
| <p>Gluten free products are widely available from most supermarkets at competitive prices. If patients require items on prescription, only the following items will be permitted. A maximum of 8 items (e.g. 6 loaves and 2 flour) may be provided a month, on NHS prescription.</p> |   |
| <b>Gluten Free Fresh Bread Products</b>  | <p>Only available through Alliance Wholesalers with no extra delivery / handling charges</p>  |
| <p>Packs of fresh bread cannot be split.</p> <p>Fresh bread is supplied in a box of 6 or 8 as indicated.</p> <p>Therefore, only one type of fresh bread can be ordered per month and may account for a full month's quota.</p>   | <p>Lifestyle Healthcare White Sliced (8)<br/>Lifestyle Healthcare Brown Sliced (8)<br/>Lifestyle Healthcare High Fibre Sliced (8)<br/>Genius White Sliced (8)<br/>Genius Brown Sliced (8)<br/>Genius White Unsliced (8)<br/>Genius Brown Unsliced (8)<br/>Genius Sandwich White (6)<br/>Genius Sandwich Brown (6)<br/>Glutafin White Sliced (8)<br/>Glutafin Brown Sliced (8)<br/>Juvela White Sliced (8)<br/>Juvela Brown Sliced (8)</p> |
| <b>Gluten Free Long Life Bread Products</b>  | <p>Glutafin Wheat-Free Fibre Loaf Sliced (8)<br/>Glutafin Wheat-Free White Loaf Sliced (8)<br/>Glutafin Select Fibre Loaf Sliced (8)<br/>Glutafin Select Seeded Loaf Sliced (8)<br/>Glutafin Select White Loaf Sliced (8)<br/>Juvela Fibre Loaf Sliced (6)<br/>Juvela Fibre Loaf Unsliced (6)<br/>Juvela White Loaf Sliced (6)<br/>Juvela White Loaf Unsliced (6)</p>   |
| <b>Gluten Free Flour Products</b>  | <p>Innovative Solutions Pure Xanthan<br/>Innovative Solutions Pure Gluten-Free Blended Flour<br/>Innovative Solutions Pure White Rice Flour<br/>Innovative Solutions Pure Brown Rice Flour<br/>Innovative Solutions Pure Potato Starch Flour<br/>Innovative Solutions Pure Tapioca Starch Flour<br/>Innovative Solutions Pure White Teff Flour<br/>Innovative Solutions Pure Brown Teff Flour</p>   |

Table 1: BHCCG HWLHCCG Joint Formulary Section 9.4.1 Foods for special diets

## Next steps:

The Department of Health has indicated that it will amend the Drug Tariff (Part XV) to reflect the results of the consultation. The amendment is planned by the Department of Health for publication in November 2018.

Flours are likely to be removed from the Drug Tariff, but there is currently no indication of which “mixes” are to be included in it. There are currently 25 different bread and flour mixes that are included in Part XV of the Drug Tariff.

The Department of Health has also indicated that it may review the range of products available on prescription and that it may restrict to the most popular types of products currently prescribed. The most popular items are described in the report<sup>1</sup> as “white and brown sliced loaves”.

Once the amended Drug Tariff has been published the Joint Formulary will also need to be amended to ensure that it includes only approved products:

- The fresh and long-life bread products may need to be amended if the current Joint Formulary approved products are removed from the Drug Tariff
- The flour products will need to be changed to flour / bread mixes to be selected from those products which are approved on the Drug Tariff.

Work to amend the Joint Formulary will start once the Department of Health has published the amended Drug Tariff and will be submitted to the APC for approval.

## References:

[1] Department of Health and Social Care (2018) *Report of Responses Following the Public Consultation on Gluten Free Prescribing: Availability of Gluten Free Food on Prescription in Primary Care*. Online:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/678181/report\\_of\\_responses\\_-\\_gluten\\_free\\_food\\_prescribing\\_consultation.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/678181/report_of_responses_-_gluten_free_food_prescribing_consultation.pdf)