

2024 NHS Scotland

Plastic Packaging and Products

1. Please provide your full name *

Fiona McIntyre

2. What is your job title *

Policy & Practice Lead

3. What company / business are you representing *

Royal Pharmaceutical Society

4. What general group are you responding on behalf of (you may choose more than one) *

☐ Supplier

☐ Manufacturer

☐ Procurement (buyer)

☒ Customer

☐ Other

5. Do you consider there to be any significant impacts to the supplier or supply chain, in relation to mandating recyclable / re-usable plastic packaging?

Please provide detail on potential impacts that you consider possible *

The Royal Pharmaceutical Society is the professional body for pharmacy and we promote the safe and effective use of medicines. The scope of the position statement is very wide and we are clear that medicines are different from other commodities and require to be considered in a different way. There are particular characteristics of medicines which require to be considered when reviewing packaging and plastics and the Medicines and Healthcare Regulatory Authority oversees those regulatory controls. We would wish to see specific information related to packaging of medicines within the NHS Scotland position statement which provides clarity on the expectations for medicines.

Depending on the scope and range of products which comply with the mandatory terms of the contract there could be a reduction in choice, potential for shortages and an increase in costs for the NHS and its suppliers. Medicines shortages are already having a significant impact on prescribers, pharmacists and patients and we do not want to see a procurement position which exacerbated this. You can read more about our work on medicines shortages at www.rpharms.com/medicinesshortages.

6. Please detail any anticipated impacts to the customer experience in relation to mandating recyclable / re-usable plastic packaging?

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The Royal Pharmaceutical Society Sustainability Policy describes the aim of sourcing alternative reusable objects to reduce the use of single-use plastics in healthcare. Mandating recyclable/re-usable packaging is an important step that NHS Scotland can take at the procurement stage of the process, and we are fully supportive of this approach. You can access our policy here : <https://www.rpharms.com/recognition/all-our-campaigns/policy-a-z/sustainability-policy/policies>

7. Would incorporating the requirement for recyclable plastic packaging into current contracts within a six-month period be feasible?

We welcome dialogue on the challenges / opportunities that this may realise whether to supplier or in the value chain. Please also indicate what you would consider as a reasonable timescale if not in agreement.

We are unable to comment on this question.

8. To account for the environmental value of our products, we may consider tender scoring in relation to plastic packaging proposals.

Would scoring on aspects such as recycled content of packaging in tenders be

acceptable to you, what are the challenges for suppliers and procurement if this approach is taken?

We agree with this approach to ensure that the suppliers comply with the necessary contract criteria, and it demonstrates to suppliers the value that NHS Scotland places on its sustainability aims by incorporating it into the tender process.

Consideration and more detail would be welcomed on whether these aspects would be incorporated into all tenders managed by NHS Scotland or only in particular classifications of items. E.g. medicines procurement, medical devices, stationary, consumables etc

Within the medicines supply chain, the same products can be available for purchase in both primary and secondary care. Will this position statement expand into good practice principles for independent contractors who provide services on behalf of NHS Scotland or will these principles only be applied to direct procurement to NHS Scotland entities?

9. Are suppliers able to, and in agreement with sharing their plastic tax obligations? *

☐ Yes

☐ No

☒ Not able to

10. If you have indicated that you are not able to share your plastic tax details, please tell us why.

In question 9, "not able to" chosen to be able to progress onto next question - we are unable to comment on whether suppliers are able to agree to these obligations.

11. Do you agree that the future considered options, outlined in Section 29 of the proposal, are reasonable next steps?

☒ Yes

☐ No

☐ Some

12. Please tell us a little more about why you answered Question 11 with your chosen option

If 'No' Please include any details of what you would consider as reasonable steps that NHS Scotland could take to progress towards Net Zero in relation to use of plastics.

These proposals contribute to sustained improvement in reducing packaging, improving use of recycled and recyclable material, reducing the burden of secondary packaging waste management and recycling from the NHS back to the supplier.

13. Are there any other details that you wish to share with us in relation to this consultation process and / or the proposals under consideration?

In line with our Sustainability Policy aims, recyclable alternatives should be identified in order to cut down the use of medicine syringes, spoons, cups and compliance aids.

14. Many thanks for your responses to this consultation. We will post a summary of responses to this consultation on our website following closure and analysis of responses received.

Do you wish to be contacted for further dialogue about this consultation or NHS Scotland's procurement journey to Net Zero? *

☒ Yes

☐ No

15. If you have opted to be contacted, please provide your preferred contact details below.

Note: We may adopt various methods of communication dependent on demand for engagement.

Email scotinfo@rpharms.com



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