

Consultation on the National Health Service (General Medical Services Contracts) (Prescription of Drugs etc.) (Amendment) Regulations 2018 Gluten Free Food on NHS Prescription in England

The BDA welcome the consultation to enable a more informed process of change in the availability of gluten free foods prescribed. The BDA agrees with the importance of appropriate definitions for all to understand and due consideration of processes to enable a smooth transition.

1. Do you think the definitions / descriptions of the products that will be allowed in future are clear and will be understood by prescribers, patients and suppliers?

'Gluten free' and 'Very low gluten' are appropriate and comply with EU regulations.

A definition of 'breads' would assist understanding that bread is more than just loaves: for example "All variants of breads: Food made of flour, water, and yeast mixed together and baked, inclusive of rolls, part-baked bread and pizza bases".

Within table 1 it is observed "To retain provision; ACBS review of GF bread against agreed definition." Thus, we understand a definition of 'breads' will be required.

Whilst the definition of a 'food mix' is suitably encompassing, it is a new term and thus may cause some confusion. Within the consultation document the following terms were used for the same selection of products: "GF mixes" or "GF mix items". We suggest a minor modification to 'GF food mix'.

'Gluten' means a protein fraction from wheat, rye, barley or their crossbred varieties and derivatives, which is insoluble in water and 0.5 M sodium chloride solution. A food is gluten free if the food, as sold to the final consumer, contains no more than 20mg/kg of gluten, and where it contains oats has been specially produced prepared and or processed in a way to avoid contamination by wheat, rye, barley or their crossbred varieties.

2. Do you think that the proposed Amendment Regulations as drafted will achieve the desired changes; to provide a staple list of gluten-free breads and mixes to patients on NHS prescription?

The proposed amendment will reduce the GF foods available through NHS prescription to only those that come under the definition of GF bread and GF food mix.

However, it does not set out how the regulations will enable access to those who are not receiving GF breads or GF mixes on prescription due to decisions made at CCG level. The amendments alone will not achieve access to all who need GF breads and GF food mixes.

The amendments do not address the quantities of GF breads and GF food mixes, to help towards equity of care between CCGs. It would be valuable for the Department of Health and Social Care to include recommended quantities of GF food.

3. Do you think the proposed Amendment Regulations will have any unintended consequences?

The source of food will substantially change for many people with coeliac disease, and as a result an awareness campaign will be required for patients and healthcare professionals. Patients may require additional appointments with their GP or dietitian to discuss changes to their diet and help enable nutritional adequacy.