

**AWTTC**All Wales Therapeutics & Toxicology Centre
Canolfan Therapiwteg a Thocsicoleg Cymru Gyfan

Document title: All Wales guide to prescribing gluten-free foods
Closing date: Friday 14 August 2026

Please fill in your personal details, comments **and** your Declaration of Interests, in the consultation form below. Please type directly into the form and save it with your initials (or other appropriate identifier) before sending it to awttc@wales.nhs.uk.

Please note: AWTTC compile all comments received during consultation into a report to be considered by the development group and the All Wales Prescribing Advisory Group (AWPAG). Each comment will be addressed and any changes to the document that are made as a result will be noted. A summary report, including any comments submitted, will be available on request within 3 weeks of publication of the finished document.

AWTTC reserves the right to summarise comments, where it is deemed appropriate, and to not publish comments if we consider their publication to be unlawful or otherwise inappropriate.

By submitting your comments, you are agreeing to them being used in line with the above.

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Declaration of interests

Do you have any business or personal interests that might be material and relevant to the project or document under consideration?

Yes	☐
No	☒

If **yes**, please give details below:

Anonymisation of comments

Your name and organisation/company will be included alongside your comments when included within the summary report considered by the development group and AWPAG. Are you happy for your name to be included when the summary report later becomes publicly available? (Please delete as appropriate)

Yes /

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Consultation comments

Is there anything you would like to see **added** to the *All Wales guide to prescribing gluten-free foods* document?

Things to consider which may be useful for the document, is the restriction on community pharmacies when ordering certain items in terms of a minimum quantity that they must order. For example, gluten free fresh bread, that is prepared to order, will often have a minimum order quantity, for example, 6 loaves. So, if a prescriber orders 1 unit, the community pharmacy will be forced to order 6 units and need to get the prescription changed to reflect the 6 units for appropriate reimbursement. Prescribers should be aware of this and consider this when adding gluten free items to a patients repeat prescription list, this will likely benefit from a collaborative approach from the pharmacy and prescriber to identify such items.

The guide could also consider referencing the potential for waste generated by prescribing of gluten free products. Gluten free foods will naturally have a shorter expiry date, but of particular importance is the naturally very short expiry dates of freshly baked products, for example fresh bread. Patients may sometimes not be aware that fresh bread has arrived in the pharmacy ready for them to collect, and may collect post the expiry date, thus generating waste. In addition, the decision to choose and prescribe a freshly baked product should be clearly discussed with the patient first, so they are aware of the shorter expiry dates and they may decide that a product which is not freshly baked may be more suitable for them.

We welcome the reference to the new card-based Gluten-Free Food Scheme (GFFS) and acknowledge the operation of this sits with health boards. We note the findings of the [Health and Care Research Wales study](#) and the potential for significant benefits to patents, such as reduced financial burden, increased choice and convenience. It is important patients retain the choice of how they access gluten free foods, wider adoption of the scheme and the de-medicalising of gluten free products has the potential to reduce dispensing activity in this area for community pharmacies, to release capacity aligning with a shift to deliver more clinical patient facing services through this setting.

Is there a plan to link in with manufacturers so that they can update the information they reflect to patients on their websites to match the updated guidance? For example, this guidance suggests pasta is one unit, whereas the Juvela website infers it is two.

[Gluten free food on prescription in Wales | Juvela](#)

With a proposed shift in the prescribing interval of prescription items from 28 days to longer intervals, e.g. 56, to note the guidance may consider adding something that if GF products continue to be supplied on prescription, these items are unlikely to be suitable for extended prescribing intervals. This is due to the practicalities of the bulky nature of them for storage for both the patient and community pharmacy, together with the expiry dates of these items.

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