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Edward J. Bechtel, R.Ph., Chair  
Pennsylvania State Board of Pharmacy  
c/o Melanie Zimmerman  
Executive Secretary  
State Board of Pharmacy  
P. O. Box 2649  
Harrisburg, PA 17105-2649

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Re: Proposed Rulemaking, Sale of Hypodermic Needles and Syringes

Dear Mr. Bechtel/Members of the Board:

Thank you for the opportunity to offer comment on the proposed deregulation of syringe sales as published in the Pennsylvania Bulletin on August 24.

As a community health advocate, I am concerned with the lack of adequate public health infrastructure and the lack of effective strategies to prevent disease and reduce disparities in health. As a former Ryan White Title II and Title III administrator, I was constantly frustrated by the fact that evidence-based strategies that reduces the spread of HIV could not be implemented in Pennsylvania. Hundreds and thousands of new cases of HIV could have been prevented if these strategies could have been implemented.

We now have the opportunity to change that by allowing the over-the-counter sale of syringes. With the proposed age restriction and limit of 30 syringes per sale, we can prevent many new cases of HIV, reduce health disparities and improve the overall health of our communities. After 15 years of working with persons abusing to drugs and alcohol, I am a strong proponent of this harm-reduction approach to reduce the damage caused by injection drug use, including the spread of the next pandemic, Hepatitis C.

I urge the Board and ultimately, the Independent Regulatory Review Commission, to work in haste to change this regulation and permit over the counter sales of syringes. By doing so, you will prevent the needless transmission of HIV, Hepatitis C and other communicable diseases.

Thank you and your Board for addressing this important public health issue.

Sincerely,



Ronald C. Dendas