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European Commission
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Concept paper for consultation: Implementing Act on a Common logo for legally operating online pharmacies/retailers offering medicinal products for human use for sale at a distance to the public

The Pharmacy Forum (hereafter referred to as the 'Forum') is the professional leadership body for pharmacy in Northern Ireland. The Forum leads and supports the development of the profession, promotes best practice among pharmacists and represents all sections of pharmacy practice.

Consultation topics

1. The technical, electronic and cryptographic requirements for verification of the authenticity of the common logo

We welcome the introduction of a 'common logo' for websites of legally operating online pharmacies/retailers, as part of wider measures to combat the illegal internet sale of medicines contained in the 'Falsified Medicines Directive'.

Whilst we support a communications campaign, emphasising that the logo is only one of a number of checks to be made to ensure that the online pharmacy/retailer is authorised, the Forum has some reservations with regards to the common logo for internet pharmacies and the potential for the logo to be copied.

Such logos are easily counterfeited, and may provide a false sense of security for patients. Questions remain as to how this will be effectively monitored on an EU wide scale.

2. Design of the logo

Having considered the two options presented in the consultation document, we consider option 2 as a preferred option.

3. National element and text associated with the common logo

In relation to what should be displayed alongside the logo cognisance must be taken of the different competent authorities operating across the EU. The public must also be able to easily verify the competent authority overseeing the registration and governance of pharmacies and premises where the supply originates.

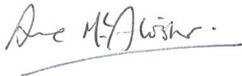
The consultation document states that the logo that will be chosen will be associated to a national element for example a flag of the concerned Member state. Whilst operating in the UK, it is important to note that the Pharmaceutical Society of Northern Ireland is the regulator for pharmacies in Northern Ireland and does not have regulatory jurisdiction on internet pharmacy premises based outside Northern Ireland.

The GPhC is the regulator for pharmacies that are located in Great Britain and only issue the GPhC logo for use on websites associated with pharmacies with a registered address in Great Britain.

4. Other issues

We would be pleased to supply any further evidence that may be required in support of the points made in our submission.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Anne McAlister", with a horizontal line underneath.

Anne McAlister
Chair of the Pharmacy Forum