

A RESPONSE BY

celesio

In relation to the public 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**

Prepared by Celesio AG External Affairs Office.

About Celesio

Celesio is a leading international trading company and provider of logistics and services in the pharmaceutical and healthcare sector, Celesio takes a proactive and preventive approach to ensuring that patients receive the products and support that they require for optimum care.

Celesio owns and operates 2,200 community pharmacies across 6 EU member states.

Celesio operates in 17 countries around the world and has approximately 40,000 employees. Every day, we serve over 2 million customers – at 2,200 pharmacies of our own and 4,500 participants in our brand partnership schemes. With around 140 wholesale branches, we supply approximately 65,000 pharmacies and hospitals every day with up to 130,000 pharmaceutical products. Our services benefit a patient pool of about 15 million per day.

Celesio is registered under the transparency register Reg No. 009272210002-09

Consultation item n°1:

Celesio agrees that it is preferable to provide for a generic obligation to ensure by means of encryption a secure transit of information between the common logo and the national list of legally-operating online pharmacies/retailers. We would further call for this generic obligation to be accompanied by minimum technical requirements, including a preferred completion date.

Celesio would similarly wish to see greater detail and harmonisation of the plans to inform the general public about the logo's in member states and how they should be used by the public.

Consultation item n°2:

Celesio prefers Logo 1.

Consultation item n°3:

An alternative wording to the 'click the logo problem' could be e.g. "only authentic if clicked".

Consultation item n°4:

Celesio questions the need to have the logo on every page. We agree that the logo must appear on the home page and any page that supports ecommerce transactions.

Consultation item n°4 other issues:

Celesio would have serious concerns that as the proposed logo will apply to both online pharmacy *and* retailers, the appearance of the logo may unintentionally confer the legitimacy of a pharmacy to an independent retailer or drug store. Such legitimacy includes the likelihood that the purchaser may believe that the presence of the logo infers that a pharmacist endorses or approves the sale and that the customer's healthcare is a priority for the seller. This emphatically is not the case in relation to non-pharmacy retailers and this likely inherited trust, potentially conferred by the logo, could cause confusion for the public.

For this reason Celesio would call on the Commission to review this latter point with a view to differentiating clearly for the purchaser whether the site is a non-pharmacy retailer or a pharmacy. In this regard a logo without the green cross for non pharmacy retailers. e.g. the use of logo 1 for pharmacies and logo 1 modified with an alternative instead of the green cross, which is synonymous with community pharmacy across the EU.

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