



CPME/AD/consultation/300408/078/EN

At the CPME Executive Committee, Brussels, 30 April 2008, CPME adopted the following document: **“CPME answer to the European Commission’s consultation document on combating counterfeit medicines”** (CPME 2008/078 EN)

CPME¹ answer to the European Commission’s consultation document on combating counterfeit medicines²

CPME approves of the aims described in the consultation document. Counterfeit medicines pose a grave danger to the well being of the citizens of the European Union. Also, the risk of patients receiving the wrong drug, or the wrong dose, leads to increased costs for the society.

The need for an unbroken control system from manufacturing through to end-consumer, as described in the document, is paramount in trying to stem the rise of counterfeit medicines reaching patients.

CPME agrees that a joint EU directive is more efficient and enforceable than unilateral laws that can be circumvented too easily. Enforcement of the directive needs to be described more and also the sanctions imposed on member states that do not adhere to it.

One of the crucial elements in the consultation document are the auditors mentioned. While CPME can see the benefit of having different levels of competence, and not attaching the function to a regulatory institution, there has to be a strict guideline and criterion's adhering to this function. The need for individual/company responsibilities must be described carefully.

CPME feels that the measures described in the consultation document are well thought out and approves of these as the first step to jointly combat counterfeit medicines in Europe. The area not covered in the document pertains to how these measures should be supervised and followed-up to make certain that any need to address any eventual shortcomings will be rapid and efficient.

¹ *The Standing Committee of European Doctors (CPME) is the representative body of about 2 million physicians in Europe. Its aims are: a) to promote the highest standards of medical training and medical practice, through advocating public health, the relationship between patients and doctors, and the free movement of doctors and patients within the European Union; b) to achieve the highest quality of health care in Europe.*

It is composed of the most representative non-governmental national medical organisations in EU/EEA countries, that is to say 30 National Medical Associations. It also unites associated members, observers and associated organisations (specialised European medical organisations).

² *Public Consultation in preparation of a legal proposal to combat counterfeit medicines for human use. Key ideas for better protection of patients against the risk of counterfeit medicines. Brussels, 11.03.2008.*