

Response to the consultation

IMPLEMENTING ACT ON A COMMON LOGO FOR LEGALLY-OPERATING ONLINE PHARMACIES/RETAILERS OFFERING MEDICINAL PRODUCTS FOR HUMAN USE FOR SALE AT A DISTANCE

Sir/Madam

In response to the above consultation, I have the following comments:

Consultation item n°1: Please comment.

Comment

No comments

Consultation item n°2: Please comment on these options. If you plan to submit another, alternative, design for the common logo as part of your submission, please be aware that the Commission does not intend to engage in any financial commitments for the use of the design of the common logo, or reference thereto, in the implementing act.

Comments

In principle, logo 1 appears to be the more appropriate of the two choices as it is easier to identify as a pharmacy logo on account of the Green cross. To increase the visibility of the logo, it would be helpful if the colour of the Grey circles is changed to Black. The colour of the logo is very important as it needs to be inclusive to all persons expected to view it, especially those that are visually impaired.

Consultation item n°3: Please comment.

Comments

- It is important that a minimum size is established to ensure that there is high visibility of the logo on pharmacy websites and that it is easily visible to all persons, especially visually impaired persons. In this regard, the commission may wish to take advice from appropriate organisations on what might be considered appropriate colours and logo size for the visually impaired.
- Animation of the logo is probably best avoided as it could become a rate limiting step during implementation of the logo on pharmacy websites on account of unnecessary complications

Consultation item n°4: Please raise any other issue or comment you would wish to make which has not been addressed in the consultation items above.

Comments

1) In the annex, the suggested text associated with the logo is:
'Click to check this website'

This sentence is subject to interpretation and would probably not mean the same thing to everyone who reads it. For example, 'Check the website' is rather vague i.e. what is one checking the website for? Other plausible suggestions are provided below:

- Click to verify if this pharmacy is registered and legally operated
- Click to verify if this pharmacy is licensed
- Click to verify if this pharmacy is legally operated
- Click to verify if this pharmacy is legal
- Click to verify pharmacy registration

It must also be taken into account whether the text will appear in English across the EU or in the national language or both.

The introduction of this logo via transposition into national law could create divergence in common with other legislation which is introduced by this route. Transposition of a directive into national law is not always done in its entirety by all EU countries and this has the potential to lead to national variations. This could become an issue if the intention is to achieve the same standard in all EU member states and should be monitored.

The logo scheme should be made mandatory so that pharmacies are unable to opt out of the scheme. Such a scheme is already operated in Great Britain by the General Pharmaceutical Committee (GPhC) and appears not to have been taken up by many pharmacies, possibly because it is a voluntary scheme.

It must be established very clearly whether both pharmacies and other retailers will be allowed to display the logo on their websites. Pharmacies are registered with their relevant national bodies and have pharmacy registration numbers that could also be displayed next to the logo (as is being done with the GB internet logo scheme). Allowing other non-pharmacy retailers to display the logo could become an issue as it would be misleading to members of the public if non-pharmacy retailers display a pharmacy logo. It should be considered whether it might be better to use an alternative logo for retailers other than pharmacies that sell medicines online so that they are not confused with pharmacies.

Yours sincerely

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