



Brussels, 16 January 2013

CPME answer to the public consultation
on a 'common logo' for
legally-operating online pharmacies and retailers

CPME strongly recommends the European Commission to reconsider both options proposed for a 'common logo' and to use neither a green cross as an indicator of authorised online sellers nor any other internationally recognised medical symbol.

The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.

We believe the best possible quality of health and access to healthcare should be a reality for everyone. To achieve this, CPME promotes the highest level of medical training and practice, the safe mobility of physicians and patients, lawful and supportive working conditions for physicians and the provision of evidence-based, ethical and equitable healthcare services. We offer support to those working towards these objectives whenever needed.

We see the patient-doctor relationship as fundamental in achieving these objectives and are committed to ensuring its trust and confidentiality are protected while the relationship evolves with healthcare systems. Patient safety and quality of care are central to our policies.

We strongly advocate a 'health in all policies' approach to encourage cross-sectorial awareness for and action on the determinants of health, to prevent disease and promote good health across society.

CPME's policies are shaped through the expertise provided by our membership of national medical associations, representing physicians across all medical specialties all over Europe and creating a dialogue between the national and European dimensions of health and healthcare.

1/ CPME thanks the European Commission for consulting the concerned stakeholders on the introduction of a 'common logo' for websites of legally-operating online pharmacies and retailers.



We encourage the European Commission to more regularly and more broadly consult stakeholders before adopting delegated and implementing acts.

2/ CPME has a longstanding commitment to patient safety and supports all initiatives in this direction. We welcomed for instance the adoption on 1 July 2011 of Directive 2011/62/EC amending Directive 2001/83/EC on falsified medicinal products. Patients should indeed benefit from the highest safety standards when purchasing medicines on the Internet.

3/ It is however to be noted that the Directive does not foresee any distinction between legal online pharmacies and legal online retailers, since it refers to the generic notion of '*Sale at a distance to the public*'¹. In this context, the use of the 'common logo' will indistinctively apply both to online pharmacies and online retailers, thus mixing online sellers led by pharmacists who have professional expertise and ethical obligations with those who are not.

4/ Considering the above, the two options envisaged by the European Commission for the 'common logo' and displayed in paragraphs 19 and 20 of the concept paper, are highly problematic. CPME fears that introducing an internationally recognised medical symbol, i.e. the pharmaceutical cross, will undoubtedly mislead patients, since they might purchase a medicine on a retailer's website while honestly thinking this seller is a pharmacy.

5/ Such a cross is globally understood to be a way of assuring patients that healthcare professionals and/or healthcare services comply with strict professional, ethical and deontological rules, thus differentiating them from those who are not subject to those rules. Not permitting this differentiation, first poses a risk to patient safety and, second to the integrity of this symbolic cross.

¹ Title VIIA of Directive 2011/62/EU