CONCEPT PROPOSAL RESPONSE DOCUMENT FOR PUBLIC CONSULTATION ABOUT THE COMMON LOGOTYPE FOR LEGALLY ESTABLISHED ONLINE PHARMACIES IN THE EU

CONSULTATION TOPICS

1. **Technical, electronic and cryptographic requirements for the authenticity verification of the common logotype:**

    The proposal made is considered to be correct from a technical point of view. It is the normal practice and it is similar to the system used on websites that have a safe server certificate (online banks, for example). When the logotype is clicked on, this should allow verification that the page is safe and is certified.

    Once redirected to the verification page, there should be the option to be able to notify any abuse or incorrect use of the logotype on a specific web site, using a similar procedure as that of authentication organisms that allow a report form to be filled in.

    We agree with the Commission that it is preferable to leave the option of establishing the details of the technical, electronic and cryptographic requirements for verifying the authenticity of the common logotype up to the Member States, since the ever-progressing technological development could easily make obsolete any specific solution that were to be adopted due to implementation laws. This option will facilitate Member States to the implementation of state of the art solutions.

2. **Design of the common logotype:**

    The General Council of Pharmacists considers that neither of the two options suggested in this proposal are suitable.

    Some countries allow medicines to be sold over the internet in Europe by operators or companies that are not healthcare establishments (i.e. supermarkets) and therefore we consider that a symbol that is traditionally used in the healthcare field (the Greek cross) is not appropriate for use by non-healthcare establishments and therefore, not subject to the strict professional and deontological regulations of the sector, as this would lead to confusion to the patient/consumer.
    This issue is the major cause for concern arising from the consultation, both for professionals and public alike.
    From the General Council we request the consideration by the European Commission of the following alternative proposal, in line with the one suggested by the Pharmaceutical Group of the European Union.

3. **National element and text associated with the logotype:**

The option of including the Member State's flag is considered to be appropriate as an identifying element of the Member State. In addition, it would be advisable to include the Member State's abreviation next to the flag, to help facilitate the patient the identification of the website's country of establishment.

The inclusion of the text "Click to check this website" is also considered appropriate.

A warning should also appear indicating that the presence of the logotype alone is not sufficient and that the patient/consumer should be urged to check that the logotype's link containing the URL of the official website, for example: http://www.msc.es/(...), since the website could also be forged.

On the other hand, taking into account that an URL may be redirected or modified in such a way that the false URL may pass unnoticed by the average user; it is particularly necessary to educate consumers about the risks of the sale of medicines over the internet.

Therefore, we understand that it is essential that the public authorities launch communication campaigns warning about the risks involved in purchasing medicines over the internet.

On the website of the national list of legally authorised online operators, indications about checks to be performed to ensure that the page is effectively safe could also be included, as well as other indications that allow users to identify the type of establishment offering the medicines for sale over the internet.

4. **Size and position of the logotype:**

The size and position of the logotype must ensure that it is easy to read and that it appears on each of the pages of the website, ideally in the same position.

The use of animations could be assessed for use to attract the attention of the web users, showing an initial animation that would later turn into the static logotype.

The logotype must have the same appearance on all the websites for all the European authorised online pharmacies, (save for the national identifier), therefore the option of using a negative is not considered to be suitable since it could lead to confusion by users. The proposal could involve the logo being enclosed within a box with a background that makes it easy to recognise, for example, a box with a white background.