

From the office of the Chief Executive

Unit SANCO/D/3, BREY 10/114, BE-1049 Brussels
By email to sanco-pharmaceuticals@ec.europa.eu

25 April 2012

Dear Sirs,

**Delegated Act on the Detailed Rules for a Unique Identifier for Medicinal Products for human use,
and its verification
Concept Paper submitted for Public Consultation**

Thank you for the opportunity to comment on your consultation.

The ABPI represents innovative research-based biopharmaceutical companies, large, medium and small, leading an exciting new era of biosciences in the UK. Our industry, a major contributor to the economy of the UK, brings life-saving and life-enhancing medicines to patients.

Our members supply 90 per cent of all medicines used by the NHS, and are researching and developing over two-thirds of the current medicines pipeline, ensuring that the UK remains at the forefront of helping patients prevent and overcome diseases.

The ABPI is recognised by government as the industry body negotiating on behalf of the branded pharmaceutical industry, for statutory consultation requirements including the pricing scheme for medicines in the UK.

Rather than commenting specifically about the various aspects of this consultation we would like to express our full support for our affiliated European Association, The European Federation of Pharmaceutical Industries and Associations (EFPIA) and their response which you will have received. In that much we are fully aligned to their position.

However we would like to acknowledge the idiosyncrasies of the UK pharmaceutical market and supply chain. It is inevitable that there will be some activities and practices that vary across the various EU Member states. No doubt other UK stakeholders will also mention this in their replies. We do not see these idiosyncrasies as an impediment to the implementation of the EFPIA joint stakeholder model in the UK. It is most important that we ensure that every avenue for dispensing of medicines is covered off in the system by mandatory scanning at point at which medicines are handed over to patients and we have already started to engage with UK stakeholders on how the EFPIA joint stakeholder model will work to achieve this level of security for patients.

Yours sincerely,



Stephen Whitehead
ABPI Chief Executive