



PGEU GPUE

Pharmaceutical Group of European Union
Groupement Pharmaceutique de l'Union Européenne

DG Sanco
Unit SANCO/D/3,
BREY 10/114,
BE-1049 Brussels

Thursday, 26 April 2012

Dear Sir or Madam

We attach the PGEU response to the Concept Paper, *Delegated Act on the detailed rules for a unique identifier for medicinal products for human use, and its verification*, on behalf of Europe's pharmacists.

Please note that the response should be read in conjunction with the PGEU/EFPIA/GIRP/EAEPIC Joint Response. Our response develops further certain points of particular relevance to pharmacy, and provides some initial estimates of pharmacy costs in implementing the system.

As you will note from the response, we support the European Stakeholder Model (ESM), which we believe offers the best solution from the point of view of efficiency, cost effectiveness and professional pharmacy practice. We do not believe however that the ESM will, or should, exclude participation of national authorities and/or agencies in the development and management of the authentication system.

We are of course at your disposal for any further information you may require.

Yours faithfully

John Chave
Secretary General