

Pharmaceutical Society of Northern Ireland
73 University Street
Belfast
BT7 1HL

17 January 2013

European Commission
DG Sanco
Unit SANCO/D/6
DM24 02/36
BE-1049 Brussels
Sanco-logo-falsified@ec.europa.eu

Concept paper for consultation: Implementing Act on a Common logo for legally operating online pharmacies/retailers offering medicinal products for human use for sale at a distance to the public

The Pharmaceutical Society of Northern Ireland is the regulatory body for pharmacists in Northern Ireland. It has a statutory responsibility for the maintenance of quality standards within the profession, and is responsible for the registration of pharmacy premises under Section 75 of the Medicines Act, 1968. Our primary purpose is to ensure practising pharmacists in Northern Ireland are fit to practise, keep their skills and knowledge up to date and deliver high quality safe care to patients.

We welcome the opportunity to respond to this consultation and provide comments with regards to the technical, electronic and cryptographic requirements of verification of the authenticity of the common logo and the logo design.

The comments below constitute general points surrounding the key issues identified in the consultation document.

Consultation topics

1. The technical, electronic and cryptographic requirements for verification of the authenticity of the common logo

We welcome the introduction of a 'common logo' for websites of legally operating online pharmacies/retailers, as part of wider measures to combat the illegal internet sale of medicines, contained in the 'Falsified Medicines Directive'. We consider the logo an important quality tool for the protection of patient safety in the purchase of medicines.

We consider the proposals outlined to be measured and sensible.

Providing the encryption methodology is robust and remains secure, this is a practical method to avoid falsified medicines entering into the legal supply chain and should be helpful to those online pharmacies/retailers that join in the scheme.

We support communications campaigns, to be organised in cooperation with the European Medicines Agency and member states, communicating the use of the logo stressing that it is only one of a number of checks to ensure that the online pharmacy/retailer is authorised.

2. Design of the logo

Having considered the two options presented in the consultation document, we consider option 2 as a preferred option.

3. National element and text associated with the common logo

Cognisance must be taken of the different competent authorities operating across the EU. The public must also be able to easily verify the competent authority overseeing the registration and governance of pharmacies and premises where the supply originates.

The consultation document states that the logo that will be chosen will be associated to a national element enabling the identification of the Member state.

Whilst operating in the UK, it is important to note that the Pharmaceutical Society of Northern Ireland is the regulator for pharmacies in Northern Ireland and does not have regulatory jurisdiction on internet pharmacy premises based outside Northern Ireland.

Conversely, the GPhC is the regulator for pharmacies that are located in Great Britain and only issue the GPhC logo for use on websites associated with pharmacies with a registered address in Great Britain.

4. Other issues

We would be pleased to supply any further evidence that might be required in support of the points made in our submission. We would also wish to be fully involved and consulted, where appropriate, in further work and look forward to future engagement.

Yours Sincerely,

A handwritten signature in dark ink, appearing to read 'Jacqui Dougan'.

Jacqui Dougan
President of the Pharmaceutical Society NI