

COMMENTS FROM THE AGENCIA ESPAÑOLA DE MEDICAMENTOS Y PRODUCTOS SANITARIOS (AEMPS) TO THE CONCEPT PAPER ON THE 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.

CONSULTATION TOPICS

Consultation item n°1: The technical, electronic and cryptographic requirements for verification of the authenticity of the common logo

We agree with the proposal of providing a generic description of the requirements as the security and inviolability of the common logo are a key element of these provisions.

Technical requirements should ensure that the reciprocal link system is robust. For example, the logo links to the website providing national list of pharmacies and the user must be able to verify the identity of this website by the use of digital certificates (e.g. Verisign); otherwise, a fake website with a false list of pharmacies can be set up.

Consultation item n°2: design of the common logo

No comments

Consultation item n°3: National element and text associated with the common logo

We consider a good idea to choose the flag of the Member State as the national element to be associated with the common logo. Nevertheless as in some Member States, including Spain, the authorization of the supply to the public lies in the regional authorities, we propose for these cases to use a combination of the two flags (region + Member State)

About the text associated we consider that it would be better to include the purpose of the check that is to verify the authenticity.

Our proposal for the text would be: "click to check **the authenticity of this website**".

Consultation item n°4: Size and position of the logo

The logo should be displayed in a place and size that makes it readily visible to users. To ensure this some recommendations or requirements on minimum size of the logo should be considered in the delegated act.

Consultation item n° 5: please raise any other issue or comment you wish to make which has not been addressed in the consultation items before

No comments.