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Carolina Martinez-Berganza

RE: Veterinary medicines legislation - targeted stakeholder consultation on common logo for on line sales

To: SANTE VETERINARY MEDICINESCc: Jan De Belie; Pharmacy PGEU

Dear Mr. ...

With regard to your consultation on the EU logo for online sale of veterinary medicines, the Pharmaceutical Group of the European Union (PGEU, representing community pharmacists in Europe) would be in favour of introducing a **specific logo for the online supply of veterinary medicines** to avoid confusion with the supply of human medicines (**Option 2** as shown below).



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Justification

The Pharmaceutical Group of the European Union (PGEU) supports indeed this approach, particularly taking into account that the EU legal framework for online supply of veterinary medicines differs from that applying to human medicines. Indeed, the new Regulation on veterinary medicines prohibits cross-border sales of POMs online (article 104 §2 of Regulation 2019/6). Furthermore, the general legal regime for the supply of both type of medicines also differs at national level. For instance, in some countries the persons authorised to sell veterinary medicines (i.e. veterinary practitioners) differ from the persons authorised to sell human medicines (i.e. pharmacists). This should be transparent and visible for customers. Finally, we estimate that for online sellers of both human and veterinary medicines, the additional administrative burden of having to implement two logos instead of only one would be marginal. PGEU therefore supports the second option suggested by the European Commission (i.e. having a separate logo to identify persons offering veterinary medicinal products).

We remain at your disposal for any further information.

With best regards,

Carolina Martínez-Berganza

Legal Advisor

Pharmaceutical Group of the European Union (PGEU)

Representing European Community Pharmacists

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