**FVE/19/doc/3** 6 January 2019

## FVE comments to the common logo to identify persons offering veterinary medicinal products for sale at a distance.

(Article 104(7) of Regulation (EU) 2019/6 on veterinary medicinal products)

FVE is grateful to the European Commission for the invitation to provide comments on the design of a common logo to identify persons offering veterinary medicinal products for sale at a distance.

FVE members all **support the specific logo for veterinary medicines**. A specific logo gives clear indication that this site is selling veterinary medicines.



If a retailer supplies both human and veterinary medicines, both logos should be used and a clear distinction between the two classes be made. The part of the website supplying veterinary medicines should in the desired control of the state of the stat

include information specifically in respect to veterinary medicines and not be overloaded by information relevant to human medicines.

In addition, the following remarks were made:

- Regulating internet trade of veterinary medicines is extremely important
- Challenges come with **adequate enforcement** on the rules for internet trading. A logo alone will not be sufficient. Member States should put in place systems to control and enforce the legislation governing on-line sales. Sufficient controls and high penalties will need to be put.
- Consumers also have access to websites operated outside the EU, many of which sell antibiotics (even Critically Important Antibiotics) without the need of a valid prescriptions. The collaboration of regulatory agencies at international level is essential to establish adequate control mechanisms to stop this dangerous situation. <sup>1</sup>
- It is important to be driving a culture that will ensure that consumers seeking medicine supply online will always check that the supplier is registered. It should be made very clear that veterinary medicines can only be bought via the internet from <u>registered</u> online retailers. The official

<sup>&</sup>lt;sup>1</sup> https://www.ncbi.nlm.nih.gov/pubmed/27151957

- website of the Members State should list clearly for consumers all registered online retailers.
- Only authorised VMPs <u>not subject to a veterinary prescription</u> may be traded via internet.
- It is important to make clear the differences in applicable national legislation for online sales and that there are differences between MS regarding the classification of supply of VMPs.