

20<sup>th</sup> December 2019

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

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

#### 1. General Comments

AnimalhealthEurope thanks the European Commission for the invitation to submit our views on the design of a common logo enabling the identification of the Member State where the person offering veterinary medicinal products (VMPs) for sale at a distance is established.

Our views are expressed in the context in which the logo will be used, as defined in article 104(8) of Regulation (EU) 2019/6, in particular that the logo will link to the relevant national website that each Member State shall set up regarding sale of VMPs at a distance.

Each national website will contain information on, *inter alia*,

- (a) its applicable national law for on-line sales;
- (b) the fact that there may be differences between Member States regarding the classification of the supply of VMPs;
- (c) a list of retailers established in the Member State permitted to offer VMPs for on-line sales as well as the website addresses of those retailers.

It is also recognised that only authorised VMPs not subject to a veterinary prescription may be retailed on-line and subject to the applicable law of the Member State in which the veterinary products are retailed.

#### 2. Specific Comments

AnimalhealthEurope members overwhelmingly supported the use of a separate logo specific to on line sales of VMPs.

For on-line customers it should be crystal clear that VMPs can only be bought via the internet from registered online retailers for veterinary medicines. A separate logo and corresponding link to the official website of the Members State, where all registered online retailers are listed, give customers, authorities and wholesalers the opportunity for online check of compliance with national law.

It is important that website information linked to the logo should not be overloaded with information that are only relevant for human medicines. Preference for option 2 does not



Click to verify  
if the website  
is operating  
legally

at all discriminate on-line retailer of human medicines who want to offer veterinary medicines at a distance as well. They should display both logos, if permitted to offer both kind of medicines.

If a shared logo is selected for both human and veterinary medicines, leading to a common website of the Member State, then the websites of the Member States must be designed to clearly differentiate between those retailers supplying human medicinal products and those retailers supplying VMPs. Separate lists should be created, supported with separate and tailored information.

In conjunction with the establishment of a list of authorised retailers for on-line sales, we consider that it is essential that Member States put in place systems and controls to enforce the legislation governing on-line sales. The loopholes in the control of the internet commerce must be closed and enforcement by authorities regarding non-compliant online trade must be improved.