

**FVE comments on COMMISSION IMPLEMENTING
REGULATION (EU) .../... of XXX
adopting the design of a common logo for the retail of
veterinary medicinal products at a distance**

The Federation of Veterinarians of Europe (FVE) is an umbrella organisation of veterinary organisations from 39 European countries, representing a total of around 300 000 veterinarians. The Federation of Veterinarians of Europe (FVE) strives to promote animal health, animal welfare and public health across Europe.

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

FVE agrees with the logo, the colour and the specifications defined for **veterinary medicines**. We welcome that the logo is similar to the human logo, but has another colour and the letters 'vet'. We also welcome the insertion of a hyperlink to the Member State competent authority list of authorised retailers.

We note some additional aspects:

- 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 include information specifically in respect to veterinary medicines and not be overloaded by information relevant to human medicines.
- A logo alone will not suffice, regulating internet trade of veterinary medicines is extremely important. Challenges come with **adequate enforcement** on the rules for internet trading. 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. ¹
- 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

¹ <https://www.ncbi.nlm.nih.gov/pubmed/27151957>

from registered online retailers. The official website of the Member State should list clearly for consumers all registered online retailers.

- Only authorised VMPs not subject to a veterinary prescription 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.