The Pharmaceutical Group of the European Union (PGEU) is the association representing community pharmacists in 32 European countries. In Europe over 400,000 community pharmacists provide services throughout a network of more than 160,000 pharmacies, to an estimated 46 million European citizens daily.

PGEU’s objective is to promote the role of pharmacists as key players in healthcare systems throughout Europe and to ensure that the views of the pharmacy profession are taken into account in the EU decision-making process.
The Pharmaceutical Group of the European Union (PGEU) welcomes the European Commission’s efforts to clarify the meaning and understanding of “similar medicinal products” and welcomes the opportunity to respond to this consultation.

However, the PGEU is concerned that the consultation and further strategy proposed by the Commission does not take due account of the special nature of the activities carried out by healthcare professionals. PGEU believes that this document would benefit from mentioning the role healthcare professionals play in patients’ treatments and the use of similar medicines.

Lines 5-8: When concerning the indication, mention of the healthcare professionals who would be prescribing, dispensing and administering these medicines is warranted. Moreover, mention of shared electronic health records should also be considered given the vital data which needs to be exchanged between professionals. For example, when the issue of naming arises, pharmacists need to ensure that the correct product is dispensed to the patient. Additionally, for reporting of adverse drug reactions the indication needs to be known.

*In conclusion, the PGEU recommends that healthcare professionals be mentioned in the updated wording, as a result of their unique role in the provision of care and similar medicines to patients.*

END