

Q&As on the Designated Wholesaler & Master Data Upload

Questions	Answers
In some countries (CZ & PL), it seems we have to declare our sales affiliates as designated wholesalers. Have you heard about this on your side?	<i>Waiting for information from local level.</i>
Sometime Generics companies (different legal entities) sell each other's products. Can 1 be classed as the DW for the other when that happens?	<p>It is not possible to answer this question without understanding the specific supply chain characteristics and the legal contracts, etc. in place.</p> <p>Consider the nature of the relationship between the two generic companies and what role they are playing. For example, is one the MAH and the other acting as a Co-promotor, in which case this could look like example 2 (Co-promoter) as long as the appropriate contractual relationship is in place.</p> <p>If, however the second generic company is simply buying product from the first with no contractual agreement in place, then the second generic company is not acting on behalf of the MAH and should not be listed as the Designated Wholesaler.</p>
Does it cause problems when a DW is recorded as "distributor" in the master data in Tracelink?	We cannot answer questions which are specific to your Level 3/4 solution provider, we suggest you raise this question directly with them.
The field in master data related to DESIGNATED W. Is the DISTRIBUTION PARTNER ID field in TARGET MARKET field in product master data?	The Designated Wholesaler should be included in the "List of Wholesalers" within the Product Per Market Data Table of the Product Master Data.
Could you please provide clarity on whether the sale of the product by the MAH to a wholesaler/distributor would preclude that wholesaler/distributor from being considered a designated wholesaler. From my interpretation even after the sale, a wholesaler/distributor could still be deemed to be distributing product on behalf of the MAH, for example if that party is a chosen distributor by the MAH to support	The Delegated Regulation only permits the designation for the purposes of storage and distribution on behalf of the MAH. If the goods are sold to the Wholesaler then they are longer storing the products on behalf of the MAH.

with market access to a particular member state (with an appropriate contract/agreement in place covering DW responsibilities of course). i.e., even though title has transferred to the wholesaler/distributor. Is this interpretation incorrect in EMVO's opinion?	
You said that it is not about the cash flow, only the flow of the goods. But when the goods are sold to a wholesaler, this wholesaler would not store the goods on the MAH's behalf anymore. It would be on his own behalf?	As above