

#### Annex 4. Application of Article 23: Wholesalers to decommission on behalf of persons authorised or entitled to supply medicines to the public

	Persons authorised to supply outside health care institutions and pharmacies	Veterinarians and retailers of veterinary products	Dental practitioners	Optometrists and opticians	Paramedics and emergency medical practitioners	Armed forces	Police	Other governmental institutions	Universities and other higher education establishments	Prisons	Schools	Hospices	Nursing homes	Decision adopted
<b>AT</b>														
<b>BE</b>					Yes, for supply to emergency medical supplies on ships	Yes, all products		Vaccination centres : vaccines						Adoption expected Q3 - beginning Q4.
<b>BG</b>														
<b>CY</b>														
<b>CZ</b>	No	<b>Veterinarians</b> : all products	No	No	No	Yes, all products	No	Vaccines	No	No	No	No	No	Adoption of the Amendment of the Act on Pharmaceuticals expected in Q4 2018
<b>DE</b>	Yes, in principle possible, but according to national law restricted to certain medicinal products, vaccines included	Yes, in principle possible, but according to national law restricted to certain medicinal products	Yes, in principle possible, but according to national law restricted to certain medicinal products	No	No	Yes, all products	Yes, all products	Yes, all products (applies to governmental institutions maintaining stocks of medicinal products for the purposes of civil protection and disaster control)	Yes, all products (applies to universities and other higher education establishments using medicinal products for the purposes of research and education)	No	No	No	No	Yes, national legislation has been adopted, is in force since 13 July 2018

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<b>DK</b>														
<b>EE</b>														
<b>EL</b>														
<b>ES</b>	Yes, only for some medicinal products	Yes, only for some medicinal products	Yes, only for some medicinal products	No	No	Yes, except medicinal products supplied to military pharmacies	No	Governmental institutions for civil protection (e.g. vaccination programmes)	No	No	No	No	No	No, Royal Decree currently under consultation. Adoption expected Q4
<b>FI</b>	No	Yes, all products for veterinary use	No	No	No	No	No	No	Yes, all products for research purposes	No	No	No	No	Not at this time, consultation expected later this year
<b>FR</b>	yes	yes	yes	no	Yes	no	yes	yes	yes	no	no	no	yes	No, under consultation and adoption expected Q4
<b>HR</b>	Yes, all products	Yes, all products	Yes, all products	No	Yes, all products	Yes, all products	No	Vaccination centres: vaccines	Yes, all products for research purposes	Yes all products , if there is no pharmacy supplying the medicines to prison	No	Yes, all products	Yes, all products	No, currently under consultation. Final decision will be made by the Ministry of Health.

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<b>HU</b>		No	No	No	Yes, all products	Yes, all products	No	Under discussion	No	No	No	Under discussion		No, currently under consultation adoption expected Q4
<b>IE</b>	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Discussion is ongoing nationally to agree what entities fall under the definition of a healthcare institution as defined in the Delegated Regulation prior to publishing national legislation.
<b>IT</b>														
<b>LT</b>	Yes, only legal entities, providing the following types of healthcare services: health rehabilitation; family medicine (general practitioners); forensic	No	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Vaccination centres: Exemption applies only to vaccines used according to national immunoprophylaxis programme	Yes, all products for research purposes	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Approval of the Order of the Minister of Health is expected on 31/10/2018

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	medicine The exemption applies to a very small amount of medicinal products that are used for healthcare in these legal entities, such as just first aid kits and others as needed.													
<b>LU</b>	Yes, depending on a list supplied to Ministry	N.A. (under cascade: human products are decommissioned by pharmacies)	Yes, but only for anaesthetics	N.A.	Yes, but reserved to certain products (vaccines)	Yes, but reserved to certain products	No	Yes, based on special lists	Yes, all products for research purposes	No	No	No	No	No currently under consultation (State council)
<b>LV</b>	Yes, example general practitioners in private practice, if decommissioning is not done by them	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, for the purposes of civil protection and disaster control	Yes, for the purposes of civil protection and disaster control	Yes, for the purposes of civil protection and disaster control	Yes, all products for research purposes	Yes, all products	Yes, all products	Yes, all products	Yes, all products	No, currently under consultation adoption expected Q4
<b>MT</b>	No	Yes, all products	Yes, only anaesthetics	No	Yes, all products	Yes, all products	Yes, all products	Yes, all products	Yes, all products for research purposes	Yes, all products	Yes, only vaccines	Yes, all products	Yes, all products	No, currently under consultation

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<b>NL</b>	Yes	Yes	No	No	No	Yes, where not via a pharmacy	No	No	No	No	No	No	No	No, currently under consultation. (This is a concept subject to change)
<b>PL</b>														
<b>PT</b>	Yes	NA	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	NA	Yes	Yes	Legislation published 24 April 2018 – Additionally, INFARMED, I.P. is preparing a directory listing all entities on behalf of whom wholesalers have to verify. This Directory will be made public, once available, to everybody in the circuit.
<b>RO</b>	Yes for dialysis centres (until 10.02.2021) and for units performing clinical studies	No	Yes	No	Yes, unless they have a pharmacy in their structure	Yes (until 10.02.2021)			No	Yes (until 10.02.2021)	No	No	No	Yes, Ministry of Health Order no. 985/06.08.2018

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<b>SE</b>	No	No	No	No	No	All products	All products	All products	No	No	No	No	No	No, currently under consultation adoption expected Q4
<b>SI</b>	No	No	No	No	No	Yes, all products	No	No	No	No	No	No	No	No, currently under consultation adoption expected
<b>SK</b>	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion	Under discussion - decision planned Q4, our intention is to ensure that the supply would be as smooth as possible and "vulnerable" supply chains burdened as little as possible, wholesalers can expect to be responsible for decommissioning (reg. art. 23)
<b>UK</b>														
<b>NO</b>	No	Yes, partly as wholesalers can sell	No	No	No	Yes	No	Yes	Yes, medicines supplied for technical (non-	No	No	Yes	Yes	No, but stakeholders have been

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		medicines to pet owners, but supply is to veterinarians.							medical) use					informed of the proposals.