

Federal Union of German Associations of Pharmacists – ABDA

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Dear Colleagues,

We are writing to address the potential policy change in Germany that would allow prescription-only medicines (POMs) to be dispensed without the presence of a pharmacist. This matter requires careful consideration as it impacts patient safety and the quality of pharmaceutical care.

There are examples worldwide where pharmacists are not legally required to be present in community pharmacies, but these are limited to countries with either less stringent professional regulations or insufficient capacity of pharmacists, which is not the case in Germany. Germany's community pharmacy legislation traditionally requires a pharmacist to be the owner of a pharmacy and their presence in the community pharmacy which ensures rigorous oversight and quality of care. Prescription-only medicines are not normal items of commerce - they are potent, highly regulated compounds that should only be dispensed under the close, professional supervision of a pharmacist. Wherever there are prescription only medicines being dispensed - there must be a pharmacist present.

The evidence is clear. Allowing prescription-only medicines to be dispensed without pharmacist oversight could lead to significant reductions in the quality of pharmacy operations and standards of patient care. It could directly lead to pharmacies becoming mere retail outlets, by the removal of the critical clinical judgement that pharmacists provide when dispensing prescription-only medicines. These include ensuring responsible medication use, identifying interactions with other medicines or foods, and providing therapeutic substitutions when necessary.

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[FIP](#), as the global body representing over four million pharmacists, pharmaceutical scientists, and pharmaceutical educators worldwide, strongly supports the essential role of pharmacists in maintaining high standards of patient care and safety.

We have compiled international information with supporting references to illustrate the crucial role of pharmacists and the implications of their removal from the process. We invite you to consider this evidence and the decision-making needed to maintain the highest standards of patient care and safety.

We hope that you find this information useful, and we look forward to our continued collaboration to support the one global voice for pharmacists and the pharmaceutical scientists.

Kind regards,

A handwritten signature in black ink, appearing to read 'Paul Sinclair', with a horizontal line underneath.

Mr Paul Sinclair, AM
President, FIP

A handwritten signature in blue ink, appearing to read 'Catherine Duggan', with a horizontal line underneath.

Dr Catherine Duggan PhD FRPharmS
Chief Executive Officer, FIP

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Annex of evidence

Pharmacists are essential in promoting patient safety, particularly in medication management. They play a crucial role in preventing medication errors and ensuring the safe use of medicines across the patient care continuum. Their expertise is vital in developing and implementing evidence-based medication safety policies and educating patients on safe medication practices. More widely than direct patient care, pharmacists advocate for a safety culture within healthcare systems, emphasising the need for their presence to maintain high standards of patient care and reduce the risk of harm associated with medication use.

Specifically, their presence in community pharmacies is vital for maintaining the safety and effectiveness of medication therapy for individual patients. Removing pharmacists from the supply chain introduces significant risks, such as increased medication errors, inadequate professional oversight, and compromised patient safety. Pharmacists are trained to identify potential drug interactions, provide therapeutic substitutions, and ensure the responsible use of medications. Without their expertise, patients face a higher risk of adverse outcomes ([FIP Statement of Policy Sustainability of pharmacist-delivered professional services through viable remuneration models](#)).

It is essential for the continued presence of pharmacists whenever medicines are dispensed to maintain the highest standards of care and safety ([FIP CPS Vision 2025 Report](#)). Pharmacists are equipped with unique skills that highlight their crucial role in all stages of medicine use, underscoring the importance of their presence to support public health.

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In promoting access to medicines, other qualified healthcare professionals can assume the responsibility of dispensing prescribed medications when a pharmacist is not available. For instance, in the United Kingdom and Denmark, registered pharmacy technicians can dispense medications without the supervision of a pharmacist. However, this practice often arises out of necessity due to a shortage of pharmacists, particularly in rural and remote areas ([Technicians and Pharmacy Support Workforce Cadres Working with Pharmacists, FIP](#)).

In low- to middle-income countries, such as South Africa, Vanuatu, and Papua New Guinea, pharmacy support workforce cadres often take on greater roles in dispensing without supervision due to less well-developed health systems and fewer available pharmacists. Despite these practices, it is essential to emphasize the risks involved, such as increased medication errors and compromised patient safety. The presence of pharmacists is crucial for managing medication interactions, providing therapeutic substitutions, and delivering comprehensive pharmaceutical care.

Also, in many countries, prescription-only medicines (POMs) are dispensed primarily by hospital pharmacies, highlighting the regulated environments where pharmacists play a key role. [FIP Pharmacy at a Glance: 2015-2017](#) report reveals that in some jurisdictions, POMs are distributed through channels other than community and hospital pharmacies, but these are limited and regulated to ensure patient safety.