



Mark Zuckerberg
CEO, Facebook
1601 S. California Ave
Palo Alto, CA 94304

June 8, 2011

Dear Mark Zuckerberg,

On behalf of the board of the Partnership for Safe Medicines, I write to you today to ask you to help avert a global health crisis that has been booming online for several years: the sale of counterfeit drugs through rogue online pharmacies.

For over 10 years we have warned the public about fake online pharmacies that peddle counterfeit drugs online under the guise of "saving money". Many more products are illegally diverted to the United States or worse, aren't even approved for sale here. The damage these fakes cause is real. Counterfeit cancer drugs that contain absolutely nothing harmful in them are still deadly, as cancer patients slowly succumb to their disease wondering why their treatments don't work. Some counterfeiters are more deadly in their immoral greed, putting toxins such as heavy metals or antifreeze in their products that do indeed kill their recipients.

The major search engines (Google, Yahoo!, and Bing) have been the subject of a great deal of criticism over the last ten years, as rogue pharmacies managed to find a way to advertise to their users despite all their stated efforts to keep them out¹. The problem is still very tangible today though the three major search engines have revised their advertising policies for the better.

The National Association of the Boards of Pharmacy estimates that 96% of the online pharmacies are not safe for consumers, and these rogues continue to market to consumers online through organic search results, email spam, and now social media.

Currently, the Facebook advertising guidelines² prohibit ads that contain, facilitate, promote, or reference "**uncertified pharmaceutical products**". However the policy is silent on who can sell "certified pharmaceutical products" and "certified" is not even defined as being certified by the US Food and Drug Administration.

The certification and sale of pharmaceutical products is regulated in most every jurisdiction where pharmacies exist. American regulators do not license Russian pharmacies to dispense product to customers from America chiefly because there is no verifiable supply chain, and it is this verification that keeps consumers safe from counterfeit drugs.

The United States enjoys the most secure supply chain in the world because of these strict protections. The major search engines have been through a ten year odyssey learning that disintermediating that

¹ See Liang BA., Mackey T. "[Searching for Safety: Addressing Search Engine, Website, and Provider Accountability for Illicit Online Drug Sales](#)", Am J. Law Med. 2009; 35:125-184

² http://www.facebook.com/ad_guidelines.php (as of Jan 10, 2011)



supply chain for the purpose of advertising revenue is a dangerous practice fraught with peril to both them (financial and legal) and their customers (financial and health). We urge you to adopt the following standards for the Facebook platform:

- Restrict pharmacies that advertise from making their ads visible outside the jurisdiction in which they are licensed to dispense drugs. (For example, only pharmacies licensed in the U.S. can advertise to the U.S.)
- Adopt the industry best practice for selecting which certification entities to determine which online pharmacies may advertise (VIPPS/VET-VIPPS for the US).
- Disallow unlicensed online pharmacies or their affiliates from maintaining Pages, Groups, and Accounts.

Whatever Facebook decides to do in the realm of online pharmacy advertising and marketing, it will instantly have an enormous impact because of your market leadership. We hope that you will recognize and learn from the mistakes of your peers and implement a policy that keeps your customers safe.

Sincerely,

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