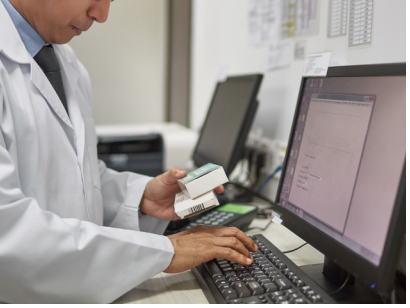


OCTOBER 2026 ALERT:

Pharmacists, pharmacy regulators, HIV patient advocates

Diverted HIV Medicines are Being Sold on Online Pharmacy-to-Pharmacy Platforms

All HIV medicines on these platforms should be considered suspect product until futher notice.

The Partnership for Safe Medicines and ADAP Advocacy are **issuing a warning today that discounted HIV products bought from online, pharmacy to pharmacy (P2P) marketplaces qualify as suspicious products** under U.S. Food and Drug Administration guidelines and the Drug Supply Chain Security Act.

Any HIV medicines available for sale on these platforms should be considered suspect product; Any HIV products you have purchased should be quarantined and verified before dispensing.

Given the risks, we believe that it isn't safe or cost-effective to purchase HIV products from these platforms.

Drug Supply Chain Security Act Implementation: Identification of Suspect Product and Notification
Guidance for Industry

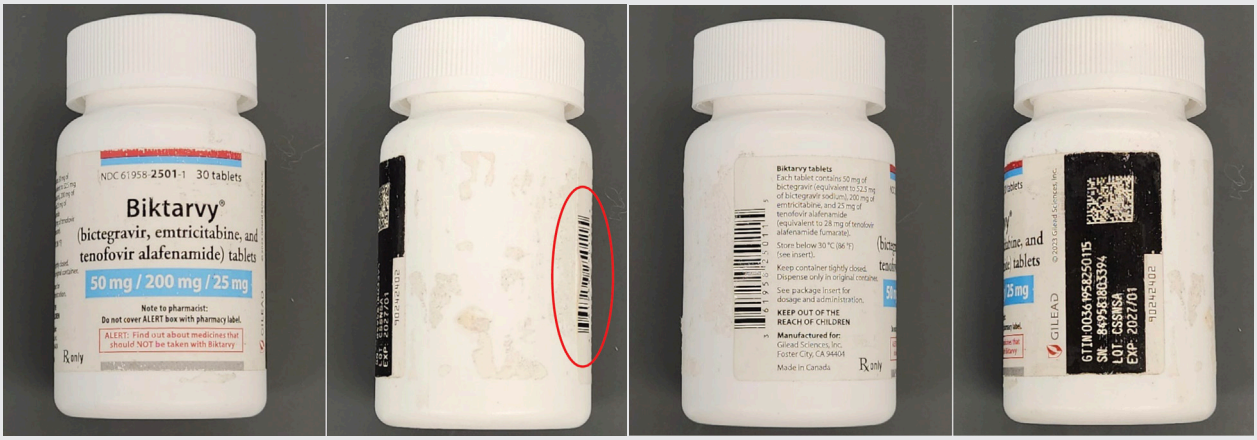
THESE RED FLAGS, FROM THE FDA GUIDANCE, ARE WHY A PRODUCT WILL BE SUSPICIOUS EVEN BEFORE YOU HAVE IT IN HAND.

1 Purchasing from a source new to the trading partner. 2 Purchasing on the Internet from an unknown source.	Buying from a P2P marketplace means buying off the Internet from a selling pharmacy you've probably never heard of, or done business with.
3 Product offered at a price that is "too good to be true."	Many HIV medicines are available at 50% off WAC, which is a literally unbelievable deal.
4 Purchasing from... a trading partner that is reluctant to provide a transaction history.	P2P platforms conduct transactions under the "named patient" need and that avoids providing transaction histories. Assuming buyers can demonstrate a named patient to a regulator, that doesn't make it safe. Anyone purchasing medicine through a P2P platform that does not provide this history should consider this a red flag.
5 Product that has been previously or is currently being counterfeited or diverted. (e.g., HIV, antipsychotic, or cancer drugs).	Gilead Sciences has already brought several cases about diverted and counterfeit versions of their HIV medicines, and issued a public alert in January 2022 about this danger.

RED FLAGS OF DIVERSION WHEN YOU HAVE P2P-SOURCED MEDICINE IN HAND:

6 Are product inserts missing?	P2P buyers have found diverted product with missing inserts.
7 Any altered product information, such as smudged print or print that is very difficult to read. 8 Bubbling in the surface of a label.	As the photos on the next page show, there is often damage to the label.

PHOTOS OF DIVERTED AND UNSAFE PRODUCT FROM GILEAD SCIENCES V. PAIN RELIEF RX, ET AL:



Source: Complaint, Gilead Sciences v Pain Relief Rx, Inc, et al, April 14, 2026.

RECOMMENDATIONS FOR PHARMACIES USING P2P MARKETPLACES:

- Reject medicines without a seller-provided ownership history.
- Quarantine and verify every product's ownership history with the manufacturer.
- Sign up for NABP's PULSE app at https://pulse.pharmacy.

RECOMMENDATION FOR P2P PLATFORM:

- Limit participation to working pharmacies with long-term licenses. Ownership and license changes should trigger a probationary period with no sales.
- Ban listings with open containers and missing or damaged packaging.
- Disallow manufacturers to surveil current, past and withdrawn listings and seller identities.
- Require sellers to include DSCSA data with every transaction.

RECOMMENDATIONS FOR DRUG MANUFACTURERS:

- Surveil P2P platforms for for suspicious sellers and products.
- Assist pharmacies in quickly validating products acquired on these platforms.

RECOMMENDATIONS FOR BOARDS OF PHARMACY AND OTHER REGULATORS:

- Consider sharing this safety alert with licensees. Remind them of their obligation to verify suspect product.
- Typical wholesale licenses don't fit these marketplaces, though some P2P platforms are seeking them. Boards contemplating new license types for P2P marketplaces should condition them on compliance with our recommendations above.
- NABP's May 2026 resolution on virtual facilities suggested a licensing workgroup to support boards in this process.

To read more about these instances of fraud and the legal requirements of investigating suspicious packages, go to:

https://www.safemedicines.org/diverted-hiv-meds-on-p2p-platforms

The Partnership for SAFEMEDICINES®

AIDS Drug Assistance Programs ADAP ADVOCACY

Oct. 2026