Healthcare Sellution

MARKET BRIEFING · GERMANY · CONSUMER HEALTH

# The German pharmacy market: a first orientation

What companies with pharmacy experience in other countries need to know before they bring OTC products, food supplements, medical devices or cosmetics to Germany.

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Germany is Europe's largest consumer health market, but it does not work like the UK, France or the US. Ownership law rules out chains, a quarter of OTC sales runs online, and nobody signs off your claims in advance.

**16,488**
community pharmacies (June 2026), the lowest count in almost 50 years

**€11.5 bn**
OTC sales in pharmacies, on-site and online, in 2025 (+2.6%)

**24%**
share of mail-order pharmacies in OTC sales 2025, up from 22% in 2023

**~€500 m**
pharmacy-range sales on Amazon.de in 2025 (+21%)

## FIVE THINGS THAT MAKE GERMANY DIFFERENT

### 01 No pharmacy chains
Only pharmacists may own pharmacies, and one owner may run at most four outlets. Scale comes from cooperations, wholesalers and mail-order players instead.

### 02 Online is a major channel, not a niche
Mail-order has been legal since 2004 and now accounts for a quarter of OTC sales. The largest online pharmacies serve Germany from the Netherlands.

### 03 Amazon matters for supplements, devices and cosmetics
For non-medicinal ranges it is often the largest online shelf; pharmacies see it as a competitor.

### 04 Pharmacy-only status is a commercial asset
Most OTC medicines may only be sold in pharmacies. Physicians also recommend OTC products on the "green prescription", which consumers pay for themselves.

### 05 Claims are policed by courts, not approved by authorities
No pre-clearance of advertising: competitors enforce the law via warning letters and injunctions.

Sources: ABDA (pharmacy count, mid-2026); IQVIA via Pharmazeutische Zeitung and PTAheute (OTC 2025); Amazon Apotheken Studie 2025 via Pharmazeutische Zeitung.

01 · STRUCTURE

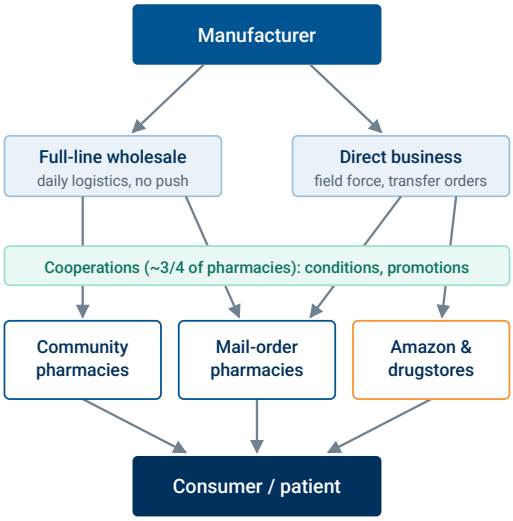
# Many independent owners, few gatekeepers

**Ownership law shapes everything.** The Pharmacy Act (ApoG) bans third-party ownership (*Fremdbesitzverbot*) and limits multiple ownership (*Mehrbesitzverbot*) to one main pharmacy plus up to three branches. There is no Boots or CVS. Instead you face about 12,500 owners, each deciding on listing and placement.

**Cooperations act as virtual chains.** Around three quarters of pharmacies belong to one of roughly 80 cooperations or marketing groups, many run by wholesalers. They bundle conditions and promotions but cannot order listings centrally.

**Wholesale is logistics, not marketing.** Full-line wholesalers supply each pharmacy several times a day, list almost everything and push nothing. Demand must be created in the pharmacy and with consumers.

**The network is shrinking.** About one pharmacy closes every day. Survivors grow larger and more selective about shelf space.




Simplified flow of goods for consumer health products. Pharmacy-only OTC reaches Amazon only via pharmacies selling on the marketplace.

PRODUCT STATUS DECIDES THE CHANNEL

| Category | Where it may be sold | Pricing | Key point for entrants |
|---|---|---|---|
| **Rx medicines** | Pharmacies, on prescription | Fixed | Reimbursement logic, not covered here |
| **OTC, pharmacy-only** | Community and mail-order pharmacies | Free (since 2004) | Pharmacy advice drives sales; "green prescription" from physicians |
| **OTC, freely saleable** | Any retailer, incl. drugstores | Free | Pharmacy positioning must be earned |
| **Food supplements** | All channels | Free | Strong on Amazon; only authorised health claims |
| **Medical devices** | All channels (some pharmacy-only) | Free | CE under MDR; advertising also falls under HWG |
| **Cosmetics** | All channels | Free | Derma cosmetics: core pharmacy and Amazon category |

Sources: Apothekengesetz (ApoG) §§ 1, 2; ABDA, Die Apotheke: Zahlen, Daten, Fakten 2025 (owner count); HCS market experience (cooperations, wholesale).

02 · ONLINE

# Mail-order pharmacies and Amazon

## Mail-order pharmacies

Every online pharmacy needs a licensed pharmacy behind it, yet a few large players dominate; the two leaders operate from the Netherlands. The market reached about €4.6 bn in 2025, with 24% of OTC sales.

They act like retailers: annual agreements, paid visibility, content and data sharing. Prices are transparent, so margin systems must work across channels.

## Amazon

Health on Amazon.de reached about €2.7 bn in 2025, with supplements up 26.7%. Pharmacy-range sales rose 21% to almost €500 m; skin care and dermatology lead with 25%.

Without an Amazon strategy, supplement, device and cosmetics brands leave volume to resellers. Since pharmacies see Amazon as a competitor, assortment, pack sizes and pricing must manage the conflict.

03 · REGULATION

# The rules in brief

| Law | What it governs | Why it matters for you |
|---|---|---|
| **ApoG** | Pharmacy ownership, mail-order licence | No chains; scale only via cooperations and key accounts |
| **AMG / AMVV** | Pharmacy-only and prescription status | Defines your channel options |
| **HWG** | Advertising of medicines and medical devices | Mandatory text; bans on certain consumer claims |
| **UWG** | Unfair and misleading advertising | Gives competitors and associations the right to sue |
| **EU 1924/2006** | Nutrition and health claims (food supplements) | Only authorised claims, close to approved wording |
| **MDR / Cosmetics Reg.** | Conformity, labelling and claims | Claims must be substantiated |

▲ **No authority approves your claims**
There is no pre-clearance; you publish at your own risk. Competitors and associations such as the Wettbewerbszentrale enforce the law: a warning letter with cease-and-desist declaration, then, if needed, a preliminary injunction within days. What is allowed is defined by case law and industry codes (e.g. FSA, AKG), not by one rulebook.

Sources: IQVIA via PTAheute and Pharmazeutische Zeitung (OTC 2025); BVDVA (online pharmacy market 2025); Smile AI, Amazon-Studie 26 via onlinemarktplatz.de; Amazon Apotheken Studie 2025. Legal overview, not legal advice.

04 · BEYOND THE OVERVIEW

# Where the real work starts

This briefing is the map. Entry succeeds on the details we work out in client projects:

- Which pharmacies to target first, and how often to visit them
- Which cooperations and wholesalers to work with, and on what terms
- How to win the top mail-order accounts and Amazon at the same time
- Field force, contract sales or transfer orders: the right sales model
- Placement in the "Sichtwahl" behind the counter versus open self-selection
- Training the pharmacy team, who make most OTC recommendations
- Physician activation and the green prescription
- Claims, packaging and POS material that hold up under German law

PROFILE

## Healthcare Sellution GmbH

| | |
|---|---|
| **What we do** | Marketing and sales consultancy for consumer health in the DACH pharmacy market: strategy, creation and implementation |
| **Services** | Brand and sales strategy, POS marketing, classic and digital communication, field force training |
| **Market access** | Entry concepts for existing consumer health brands; distribution of medical devices on request |
| **Clients** | Brand manufacturers such as PAUL HARTMANN, Weleda, Bausch & Lomb |
| **Set-up** | Baden-Baden and Munich; core team plus ~40 specialists |
| **Membership** | Pharma Deutschland |

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## Planning your entry into Germany?

Book an introductory call. We review your portfolio, show where the opportunities are and share what we learned in comparable projects.

**Book a meeting →**

Or email kontakt@healthcare-sellution.de

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