

Retail Pharmacy Market Study

Statement of Scope

11 June 2026



Coimisiún um
Iomróid agus
Cosaint Tomhaltóirí

Competition and
Consumer Protection
Commission

Introduction

1. We have launched a market study of the retail pharmacy market in Ireland. This is a significant market for consumers across the State. Retail pharmacies (also known as community pharmacies) provide essential medicines and services to consumers, with research finding that over 2 million consumers visit pharmacies on a weekly basis.¹ In conducting this market study, we want to understand how the retail pharmacy market is currently operating and the extent to which competition in this market is working well for consumers. This will involve examining the consumer experience when purchasing products and services from retail pharmacies, as well as assessing how retail pharmacies compete to win consumers. Where we identify issues that undermine competition and harm consumers, we will propose ways to address these issues to improve competition and consumer outcomes.
2. This document outlines why we have launched the market study and how we plan to conduct the market study. We also outline what we consider a well-functioning retail pharmacy market looks like and the issues that we intend to examine. Our objective in conducting this market study is to bolster competition and support positive consumer outcomes. We are inviting stakeholders to share their views on our intended approach to the market study and their experience of the retail pharmacy market. We want to hear from consumers, pharmacy owners, pharmacists, public bodies and regulators, industry representative groups, consumer and patient groups and anyone that has views or experiences of this market. We have listed questions for stakeholders at the end of this document. We plan to engage with stakeholders throughout the market study;

¹ Irish Pharmacy Union (2024). *Public attitudes towards pharmacy: 2024 survey*. Available on the Irish Pharmacy Union's website: [Public attitudes towards pharmacy: 2024 survey - IPU](#)

this document represents the first opportunity for stakeholders to share their views with us.

3. The market study is not a criticism of pharmacists' professionalism, clinical judgement or the care they provide. Our focus is on understanding how competition in the retail pharmacy market is working for consumers.

Why we are launching a market study

4. **Retail pharmacy is a significant market:** The retail pharmacy market is a large, nationwide and essential consumer-facing market. Consumers rely on retail pharmacies for medicines and essential services, with over 2 million consumers visiting pharmacies regularly.² Given its significance, it is particularly important that competition in the retail pharmacy market is working well for consumers.
5. **Why we are launching a market study:** We are launching a market study because we have identified areas of the retail pharmacy market that may not be working well for consumers, and we want to better understand these issues. Based on consumer complaints, preliminary research and market developments, we have identified potential issues that may be hindering effective competition and leading to or risking consumer harm. These issues include opaque price display practices and difficulties in switching between pharmacies. Moreover, there are high levels of price dispersion for some prescription products, which may be driven by a lack of effective competition. Other issues relate to the impact of the regulatory framework on competition and ultimately the price of over-the-counter ("OTC") products, such as restrictions on which OTC products can be sold in non-pharmacy retail settings and licensing rules which may impact on the sale of own-brand OTC products by supermarkets. Moreover, the growing

² Irish Pharmacy Union (2024). *Public attitudes towards pharmacy: 2024 survey*. Available on the Irish Pharmacy Union's website: [Public attitudes towards pharmacy: 2024 survey - IPU](#)

prevalence of digital prescribing practices and ongoing consolidation in pharmacy ownership indicate that a study of the retail pharmacy market is timely. These issues indicate that a market study of the retail pharmacy market aligns with the CCPC's role in promoting competition and protecting consumer interests, particularly in an essential market where effective competition and informed consumer choice can support better value and outcomes for households facing cost of living challenges.

6. **A market study of the retail pharmacy market aligns with the CCPC's strategy and priorities:** As outlined in the CCPC's Strategy Statement, we are focused on advocating for changes to bolster competition and strengthen consumer outcomes. We aim to be the leading voice in promoting open and competitive markets and representing the interests of consumers. This market study aligns directly with our ambition to make markets work better for consumers by representing their interests.
7. For the avoidance of doubt, the matters identified in this Statement of Scope are preliminary. We have not reached any conclusions. The purpose of this market study is to gather evidence, assess how the market is functioning, and determine whether action by the CCPC or others could improve competition and consumer outcomes.

Key market characteristics

8. There are 1,918 retail pharmacies in the State.³ Retail pharmacies are present across the country and are an important access point for consumers seeking medicines, healthcare advice and related services. Retail pharmacies may be

³ The Pharmaceutical Society of Ireland, Pharmacy Statistics, available at: [The Pharmaceutical Society of Ireland website](#)

independently owned, part of a chain, or operate under a shared brand as part of a symbol group.

9. Retail pharmacies sell prescription products, OTC products and front-of-shop products, such as makeup and vitamins. Retail pharmacies also offer services, such as consultations and vaccinations.
10. The State plays an important role in the retail pharmacy market, including through public reimbursement schemes and the Community Pharmacy Agreement. For medicines supplied to consumers under State reimbursement schemes, the State has a direct role in deciding which medicines are reimbursed, what price is reimbursed, and what eligible consumers pay at the point of dispensing. Retail pharmacies set the price of products charged to private consumers - those who are not covered by a State reimbursement scheme.
11. The market operates within a regulatory framework involving several bodies. For example, the Pharmaceutical Society of Ireland regulates pharmacists and pharmacies; the Health Products Regulatory Authority regulates medicines, including decisions on whether medicines are prescription-only, pharmacy-only or general sale; and the HSE has responsibilities relating to reimbursement and payment arrangements for medicines supplied under public schemes. These regulatory arrangements can affect what products may be sold, where they may be sold, how they are supplied, and how some medicines are priced or reimbursed.

A well-functioning retail pharmacy market

12. For the purposes of this market study, we use the term “a well-functioning retail pharmacy market” to describe a market that delivers positive outcomes for consumers through effective competition. In such a market, pharmacies compete (and are incentivised to compete) to win and keep consumers through meeting their preferences and needs. We do not use the term to imply an idealised or perfectly competitive market.

13. A well-functioning retail pharmacy market would be expected to display the following characteristics:

- **Price information is clearly communicated to consumers:** Consumers can easily access information about the price of the products and services they need and use this information to make informed choices.
- **Consumers have choice and can easily switch between pharmacies:** Consumers have choice between different pharmacies based on their preferences. These preferences may include price, product or service and location. Moreover, consumers can easily switch between retail pharmacies.
- **Pharmacies compete for consumers:** Pharmacies compete on price and service quality to attract and retain consumers. Pharmacies are incentivised to meet consumers' needs and preferences.
- **Regulatory frameworks achieve their goals while also supporting effective competition and positive consumer outcomes:** Regulation has the potential to introduce undue barriers to entry or expansion, consumer switching, or alternative supply options. In a well-functioning market, regulatory frameworks achieve their goals (for example, in relation to patient safety and health) in a proportionate manner and where possible support consumer welfare and do not unnecessarily restrict competition.

14. These characteristics provide a high-level indication of what a well-functioning retail pharmacy market looks like. We will consider these characteristics when assessing how the retail pharmacy market is currently operating and as we consider ways to improve competition and consumer outcomes.

What we propose to focus on

15. The market study will focus on the supply of pharmaceutical products to end consumers in the State through retail pharmacies. Consequently, we do not plan

to assess the supply of products through hospital pharmacies. While retail pharmacies sell a wide range of products, including front-of-shop products like toiletries and cosmetics, we intend to focus on the supply of prescription and OTC products.⁴ Our focus is, at this stage, primarily on the supply of prescription and OTC products. However, we may also consider the services that pharmacies provide, such as consultations and vaccinations, depending on the information we receive. Our focus is on the supply of prescription and OTC products to end consumers at the retail level. However, we may also identify and consider issues in **upstream wholesale markets for these products that have a significant impact on** consumer outcomes in the retail pharmacy market.⁵

16. When assessing the retail pharmacy market, we will seek to understand the following issues:

- **The consumer experience:** We will examine consumers' experience of the retail pharmacy market. This includes:
 - ***The consumer purchasing journey:*** We will examine how consumers make decisions about which pharmacy to use, and what factors are most important to them.
 - ***Access to information:*** We will assess the availability of price information and whether consumers have sufficient information to make informed choices.
 - ***Ease of switching:*** We will assess whether consumers face challenges in switching between pharmacies. We intend to examine whether current market practices and

⁴ We may consider the supply of front-of-shop products insofar as it impacts on the supply of prescription and OTC products.

⁵ This is unlikely to include a standalone assessment of competition in these wholesale markets.

digital prescribing impacts consumer switching behaviour.

- **Regulatory frameworks:** Within the context of their overarching goals, we will examine whether current regulatory frameworks support competition and consumer outcomes. We will examine how regulatory frameworks impact price transparency, consumer switching and entry and expansion in the retail pharmacy market and competition between pharmacies. For example, we intend to examine regulations that govern which OTC products (and what quantities of these products) can be sold in non-pharmacy settings, such as supermarkets. We will also assess whether there are potential changes to the current regulatory framework which will promote competition without compromising on their overarching objectives.
 - **Competition and market conduct:** We will assess how pharmacies compete for consumers and are incentivised to meet consumers' preferences. We will also seek to identify market conduct that may hinder effective competition. We will also assess market structure, concentration, consolidation and entry and exit.
 - **Market outcomes:** We will consider the outcomes the retail pharmacy market is currently delivering. We may consider how prices have developed over time, quality of services, profitability and market trends and events.
 - **State pricing and reimbursement:** We will also consider how State pricing and reimbursement arrangements may affect incentives, competition and consumer outcomes in the retail pharmacy market, including for customers who may face different prices depending on their eligibility to participate in or benefit from State schemes.

17. We invite stakeholders to share their views on our proposed focus. As we receive stakeholders' views and other information, the scope of the market study may change.

Possible outcomes

18. Our aim in conducting the market study is to understand how competition is working in the retail pharmacy market. Following information gathering and analysis, we may identify ways to improve competition and consumer outcomes.

Therefore, we may take the following types of action:

- **Recommendations to government and public bodies:** Based on our analysis of the retail pharmacy market, we may make specific recommendations about legislative or regulatory reform that could enhance competition and associated consumer outcomes.
- **Inform policy debate:** We may make policy recommendations to government about different options to be considered to deliver strong competition and consumer outcomes. The aim of these policy recommendations would be to inform policymakers as policy is formulated.
- **Consumer information campaigns and guidance:** We may launch consumer information campaigns and publish consumer guidance to empower consumers to make informed decisions in the retail pharmacy market.
- **Industry information campaigns and guidance:** We may publish guidance for pharmacy owners to address any identified issues.
- **We may take enforcement action:** We will take enforcement action where we consider there are breaches of competition and/or consumer protection law.

19. If we do not identify issues impeding competition or causing or risking consumer harm, we may take no further action and continue to monitor the market.

20. The CCPC does not have the statutory power to impose remedies on market participants as a result of a market study. However, we will actively engage with stakeholders to advocate for stronger competition and positive consumer outcomes.
21. We have listed the types of actions we may take to inform stakeholders about the potential outcome of the market study. For the avoidance of doubt, we have not identified specific actions we intend to take at the market study's conclusion, and the outcome of the market study is not predetermined. We will decide on what actions we take following our engagement with stakeholders and our analysis of the retail pharmacy market.

How we will approach the study

22. We will engage with stakeholders, gather information and conduct analysis throughout the market study process.
23. **Engagement with stakeholders:** We want to hear from a broad range of stakeholders. We are asking stakeholders to share their views on this Statement of Scope. We also intend to engage with stakeholders throughout the market study process to understand their experience and views of the retail pharmacy market. This engagement may include meetings and calls, voluntary information requests and, where appropriate, statutory information requirements.
24. **Information gathering:** We intend to gather a broad range of information from different sources throughout the market study. We may also conduct primary consumer research, such as a consumer survey. We intend to take a targeted and proportionate approach to information gathering. As the information base develops, we may refine or prioritise aspects of the study to focus on the issues that are most important to understand how the market is functioning and where improvements might most effectively be made.
25. **Update Report:** Following our engagement with stakeholders, information gathering and preliminary analysis, we plan to publish an Update Report. The

Update Report will outline our work to date, our preliminary views about how the market is working and potential ways in which competition and consumer outcomes can be improved. We will invite stakeholders to share their views on the Update Report.

26. **Publication:** Following our consultation on the Update Report, we will finalise and publish the Market Study Report. This report will outline our analysis and recommendations to improve competition and consumer outcomes. Our current expectation is that the final report will be published during the summer of 2027. This timing is indicative and may change as the study progresses, including in light of the information received, the nature of issues identified, and the extent of further analysis or engagement that is required. We will provide an update on expected timing in the Update Report.

Invitation to comment

27. We want to hear from consumers, pharmacy owners, pharmacists, public bodies, industry representative groups, consumer and patient groups and anyone with views on the retail pharmacy market. These views will be important in helping us to develop our understanding of how the retail pharmacy market is functioning and whether there are opportunities to improve outcomes for consumers.
28. We have listed several questions below which we are inviting stakeholders to respond to. As noted, we intend to engage with stakeholders throughout the market study process, but these questions represent the first opportunity to engage with us on the market study.
29. You may respond to any or all the questions below that are relevant to your experience or expertise. Please include any further comments that have not been captured by the questions below.

Consultation Questions

Focus and a well-functioning retail pharmacy market

Q1: Do you agree that the issues outlined above are the main issues that should be examined? If not, please explain why you disagree and indicate what other issues or areas should be included and why.

Q2: Do you agree with our description of the characteristics of a well-functioning retail pharmacy market as outlined above? If not, please explain why you disagree and please set out what should be changed in the description, and why?

Consumer experience

Q3: Which aspects of the consumer experience (for example, seeking price information, choosing a pharmacy, switching between pharmacies, purchasing products and services) should we focus on most closely?

Q4: To what extent do current price displays (in-store and online) and pricing practices enable consumers to make informed choices? Can consumers easily compare prices between products within a pharmacy? Can consumers easily compare prices between pharmacies? Please provide evidence (including your experience of price displays) where possible.

Q5: How, if at all, do digital prescribing practices (prescriptions are sent by medical professionals electronically to the pharmacy) impact on consumers' ability to choose which pharmacy to purchase products from? How, if at all, do digital prescribing practices impact on consumers' willingness to switch between pharmacies?

Regulatory framework

Q6: Are there elements of current regulatory frameworks that support effective competition and consumer outcomes in the retail pharmacy market? Please identify the relevant regulatory framework and tell us why it supports effective competition and consumer outcomes.

Q7: Are there elements of current regulatory frameworks that inhibit competition and positive consumer outcomes in a disproportionate manner? Are there features of these regulatory frameworks which create unnecessary or disproportionate barriers to new suppliers entering the market or existing suppliers expanding? Are there regulatory frameworks which hinder consumer switching?

Q8: Should we examine the restrictions on selling certain medicines or quantities of medicines in non-pharmacy retail settings, such as supermarkets? To what extent do current rules which limit the sale of certain products to pharmacies impact competition, consumer choice, or prices? If so, in what way and how sizeable is the impact of these restrictions?

Q9: The State agrees prices with the pharmaceutical industry for many of the products dispensed in pharmacies. The State also pays for products dispensed to consumers that are covered by a State reimbursement scheme (e.g. those with a medical card) and sets the price it will pay for products dispensed to those consumers. To what extent do these pricing and payment arrangements affect incentives, competition and consumer outcomes in the retail pharmacy market, including the prices paid by different groups of consumers such as those who may not be eligible for State schemes?

Competition and market structure

Q10: Are there features of the retail pharmacy market, such as the presence of large chains, franchise or symbol groups, buying groups, or vertically integrated suppliers, that we should look at? If so, what are the features we should consider and how might they be affecting competition or consumer outcomes?

Q11: Are there issues or features of wholesale markets for prescription and OTC products that impact competition and consumer outcomes in the retail pharmacy market? If so, what are these issues or features and how are they affecting competition and consumer outcomes in the retail pharmacy market?

Other issues

Q12: Are there particular products, services, customer groups or parts of the market where we should focus our analysis of price, service quality, access or the consumer experience? Please explain your reasons and provide evidence where possible.

Q13: What evidence sources, datasets or stakeholder perspectives should we consider as part of this market study?

Q14: What types of research and analysis should we conduct? What specific research questions should we seek to answer?

Responding to the Statement of Scope and next steps

30. Please send written submissions to ccpcmarketstudy@ccpc.ie by 9 July 2026.
31. Further information on how the CCPC will treat information provided in response to this Statement of Scope is set out in Appendix A below.
32. After considering responses to this Statement of Scope, we intend to continue to engage with stakeholders and gather further information. As noted above, we plan to publish an Update Report that will outline our preliminary view on how the market is operating and ways in which competition and consumer outcomes can be improved.
33. We appreciate your engagement with us. Your contributions will help us to examine this market and identify measures that could improve outcomes for consumers.

Appendix A: Use of information provided to the CCPC

1. The CCPC will not publish the responses received without the respondent's consent. We may summarise and refer to the responses in the Update Report and Final Report. We will not attribute responses to the relevant respondent without their consent. We will list all respondents who consented to be named as a respondent to the Statement of Scope. Please indicate in your response if you

consent to the CCPC listing you as a respondent in the Update Report and Final Report. For clarity, the CCPC will not list the identities of respondents who engage with us as consumers or pharmacists in their personal capacity.

2. The data we collect helps us to comply with our legal obligations and carry out our statutory functions and activities. The data we collect, the basis of processing and the purposes of processing are detailed in our General Privacy Notice. For further information, please see our [General Privacy Notice](#).