



GOVERNMENT GAZETTE

OF THE

REPUBLIC OF NAMIBIA

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General Notice

NAMIBIAN COMPETITION COMMISSION

No. 732

2021

NOTICE OF ACTION TO BE TAKEN UNDER SECTION 38: THE NAMIBIAN
COMPETITION COMMISSION // PHARMACEUTICAL SOCIETY OF NAMIBIA
AND OTHERS
(CASE NUMBER: 2018JUN0003COMP)

COMPETITION ACT, 2003
(Section 41, Rule 18(1))

1. The Namibian Competition Commission (“the Commission”) during September 2018 initiated an investigation against the Pharmaceutical Society of Namibia (“the PSN”) and its member pharmacies. The Commission investigated the matter and during January and February 2020 gave notice of its proposed decision.
2. **The Commission gives notice that it intends to take the following action under section 38 of the Competition Act:**
 - 2.1 Following the investigation and consideration of all representations, including the written representations made in terms of section 36 and the matters raised at the conference held in accordance with section 37 of the Competition Act, the

Commission has resolved to institute proceedings in Court against the Respondents for an order:

- 2.1.1 Declaring that the Respondents have contravened section 23(1) read with section 23(2)(a) and section 23(3)(a) of the Competition Act;
- 2.1.2 Ordering the Respondents to cease with the conduct;
- 2.1.3 Restraining the Respondents from engaging in the conduct in future;
- 2.1.4 Seeking an appropriate pecuniary penalty against the Respondents in terms of section 53(1)(a) and 53(2) of the Competition Act, taking into account the factors stated in section 53(3) of the Competition Act;
- 2.1.5 Ordering that the Respondents to pay the costs of the proceedings; and
- 2.1.6 Such further and/or alternative relief as the Court may consider appropriate;

Against:

The following undertakings/association of undertakings, as the Respondents against which relief will be sought in terms of section 38:

- 2.1.7 **The Pharmaceutical Society of Namibia (“the PSN”)**, a voluntary professional association for pharmacists in Namibia, and having its business place at Office No. 14, Gecka Pharma, 32 David Hosea Meroro Drive, Windhoek, Namibia.
- 2.1.8 All relevant pharmacies, as indicated in the “**Annexure A**” document attached hereto.

Both the PSN and the concerned pharmacies will cumulatively be referred to as the “**Respondents**”.

3. The nature of the conduct that is the subject-matter of the action is that:

- 3.1 As part of their business, pharmacies *inter alia* prepare, dispense and sell medicine to patients with or without a doctor’s prescription. The PSN on the other hand, is a voluntary association of pharmacies which exists to *inter alia* protect the welfare of its members.
- 3.2 The Commission’s investigation, submissions received, and evidence uncovered indicate that the PSN has a long-standing mandatory rule that requires pharmacies to impose a 50% mark-up on the dispensing of medicine. The investigation further found that aforementioned rule prohibits pharmacies from deviating from the 50% mark-up. Pharmacies on the other hand, by virtue of becoming members of the PSN submit to the authority of the PSN and are therefore, liable for infringement of the Competition Act. Furthermore, the PSN and its members have agreed to maintain the 50% mark-up pricing structure even when presented with what appeared to be a better alternative.
- 3.3 The Respondents through the PSN, have denied engaging in the conduct and have raised the following primary defenses; That,
 - 3.3.1 The 50% mark-up is not strictly enforced by the PSN nor is it strictly applied by all pharmacies and depending on medication, a 10% mark-up can be applied while in certain remote areas a mark-up can exceed the 50% benchmark to cover the additional cost such as transport.
 - 3.3.2 The 50% markup is a mechanism to determine the price which medical aid funds are prepared to pay for medicine as well as medical aid related services linked to the NAPPI code;

- 3.3.3 A “levy” which is not related to the mark-up is a percentage that each medical aid fund expects its members to pay at the time of receiving a medical service including medicine.
- 3.3.4 The mark-up is variable and ranges from 10 to 100%. If a medical aid scheme has a levy of 20%, on a N\$100 medicine, the levy would be N\$20. If a pharmacy charge N\$102, the levy would be N\$22, however, if the pharmacy were to charge less than the N\$100, say N\$90, then the levy would be N\$18.
- 3.3.5 The 50% mark-up pricing structure is a NAMAF benchmark tariff that is calculated and has been implemented in many years with the objective of sustainability and ensuring that healthcare services are accessible to all Namibians. There are similar practices in other countries such as Botswana, South Africa, Zimbabwe and Angola.
- 3.3.6 Benchmark tariff is a guideline determined by NAMAF as a guideline on pricing for medication. Should NAMAF not provide the benchmark tariffs, the cost of healthcare services would unreasonably escalate.
- 3.4 Based on the grounds set out further down below, the Commission has not been persuaded by the above claims.
- 3.5 The Commission’s investigation has in fact found that:

3.5.1 The market has been correctly defined

3.5.1.1 The investigation identified the product market as that of the dispensing of medicine by the pharmacies to patients (consumers) in Namibia, since the 50% mark-up is applicable in respect of the medicine that are dispensed by pharmacies to consumers throughout Namibia. None of the Respondents have disputed the Commission’s market definition.

3.5.2 Evidence of Engaging in the Conduct:

3.5.2.1 Despite the arguments by the Respondents, the evidence gathered by the Commission shows that the PSN reprimands pharmacies for charging a mark-up less than 50%. The PSN has also gone as far as making investigation referrals to the Pharmacy Council of Namibia through the Health Professions Council of Namibia (“HPCNA”) against pharmacies that have “offered discounts” on medicine.

3.5.2.2 Evidence obtained has also revealed that the PSN and its members met and agreed to keep the 50% mark-up pricing structure in place. Efforts by the Namibian Association of Medical Aid Funds (“NAMAF”) recommending more relevant pricing models were rejected without reasonable justifications.

3.5.3 The 50% mark-up is not a mechanism to determine the price which medical aid funds are prepared to pay

3.5.3.1 The 50% mark-up is the margins that pharmacies place on top of the cost for medicine plus VAT. The “sticker price” remains the same whether a medicine is dispensed to a medical aid fund member or “cash consumers”.

3.5.4 The 50% mark-up is not a NAMAFA benchmark tariff and is not determined by NAMAFA

3.5.4.1 Evidence before the Commission shows that the 50% mark-up is not a NAMAFA initiative. In fact, the 50% mark-up predates the existence of NAMAFA and the PSN. However, the PSN in agreement with its members resolved to maintain and continue charging a 50% mark-up when NAMAFA tried to do away with it and proposed a four-tier dispensing fee model.

3.5.5 The PSN and its members' conduct amounts to price fixing

3.5.5.1 The PSN and its members from the start have agreed to adopt the 50% mark-up pricing structure and as such, the PSN has resolved to include a clause in its constitution further cautioning its members against deviating from imposing 50% mark-up. In its own admission, the PSN confirmed that, it has together with its members agreed to maintain the 50% mark-up pricing structure even when a seemingly better alternative was proposed by NAMAFA.

3.5.5.2 In addition, the PSN has taken numerous steps against pharmacies that have deviated from the 50% mark-up pricing structure by giving discounts and waiving co-payments on prescriptions. This conduct automatically qualifies as concerted practices and/or agreements between parties in a horizontal relationship, and a decision by an association of undertakings, to engage in price fixing which is a prohibited conduct in terms of section 23 (1) read with section 23 (2) (a) and section 23 (3) (a) of the Act.

3.5.6 The Respondents have therefore, also failed to provide a justification for the setting and implementation of the 50% mark-up.

3.5.7 No exemption has been sought in terms of Part III of the Competition Act in this matter.

3.5.8 The conduct of the Respondents therefore amounts to a decision, agreements and concerted practices to fix prices and trading conditions as a contravention of section 23(1) read with section 23(2) (a) and 23(3)(a) of the Competition Act.

4. Notwithstanding the above, the Commission records that it is willing to engage with the Respondents with the object of settling the matter in terms of section 40 of the Competition Act and to avoid proceedings in terms of section 38 of the Competition Act.

**P. CARLSON
CHAIRPERSON
NAMIBIAN COMPETITION COMMISSION**

ANNEXURE A: RESPONDENTS (PHARMACIES)

1.	ABC PHARMACY	5 Harris Putch Drive, Welwitschia Complex, Walvis Bay, Namibia
2.	ADLER APOTHEKE	14 Sam Nujoma Avenue, Swakopmund, Namibia
3.	AUAS VALLEY PHARMACY CC T/A AUAS VALLEY PHARMACY	10 Bessemer Street, Auas Valley, Suiderhof, Windhoek
4.	BADENHORST PHARMACY	3 St. George's Street, Otjiwarongo, Namibia
5.	BEULAH PHARMACY CC T/A BEULAH PHARMACY	6 Goethe Street, Eros, Windhoek, Namibia
6.	BORDER 2000 PHARMACY	Nedbank Centre, Oshikango
7.	CB KLEIN T/A CRYSTAL PHARMACY CC	Dr Putch Harris Drive Medipark, Walvis Bay, Namibia
8.	CECE OTJO PHARMACY	Bon Street 6, Dehli Square, Unit 4, Otjomuise, Windhoek, Namibia
9.	CHRISMED PHARMACY	18 Niklaas Olivier Street, Block A, Rehoboth, Namibia
10.	CRYSTAL PHARMACY	137 Bachet Street, Windhoek West, Namibia
11.	CITY PHARMACY	Independence Avenue, Levinson Arcade, Shop No 4, Windhoek
12.	CONTINENTAL PHARMACY	292 Independence Avenue, Windhoek, Namibia
13.	CUVELAI PHARMACY CC T/A CUVELAI PHARMACY	Unit O 15 A, Yetu Complex, Sam Nujoma Street, Oshakati, Namibia
14.	CUVELAI PHARMACY CC T/A YETU PHARMACY	Main Road, Oshana Regional Mall, SHOP 43/ 47, Ondangwa, Namibia
15.	CARE ONE PHARMACY	Olivier Street, Erf. 1118, Block A, Rehoboth, Namibia
16.	EMPIRE PHARMACY CC T/A EMPIRE PHARMACY	92 Martin Neib Avenue, Shop 6, (Next to Rhino Restaurant, opposite Super quick), Okahandja, Namibia
17.	EMPIRE PHARMACY CC T/A EMPIRE PHARMACY THIPANANA	Main Street, Erf. 556, Divindu Townland, Mukwe, Namibia
18.	EMPIRE PHARMACY CC T/A HARDAP PHARMACY	15 Dr Sam Nujoma Avenue, Woermann Brock Complex, Room 5, Mariental, Namibia
19.	EMPIRE PHARMACY CC T/A OTJIMED PHARMACY	214 Son Street, (Opposite Clinic), Otjiwarongo, Namibia
20.	EPAKO PHARMACEUTICALS CC T/A HEARTLAND PHARMACY	Main Road, shop 20, Namchi Park Complex, Oshikango, Namibia
21.	EPAKO PHARMACEUTICALS CC T/A ROCKY CREST PHARMACY	Long Island Road Shop 1, Rocky Crest Shopping Centre, Rocky Crest, Windhoek, Namibia
22.	ERONGO MEDICAL CARE PTY LTD T/A OCEAN VIEW CHEMIST	Oceanview Shopping Centre, Ext No 9, Swakopmund, Namibia
23.	EROS APOTHEKE	5486 General Murtala Mohammed Street, Unit 3, Eros, Windhoek, Namibia
24.	ESSENTIAL HEALTH PHARMACY CC T/A ESSENTIAL HEALTH PHARMACY	Grimm Street, (Next to Tre Supermarket), Windhoek
25.	ESTERIA APTEEK CC T/A DIE ESTERIA APTEEK SENTRUM	269 Independence Avenue, BPI House, Windhoek, Namibia
26.	EUSA PHARMACEUTICALS CC T/A CORNER PHARMACY	Ondoto Street, Erf.951, Shoprite U Save Centre, Katutura, Windhoek, Namibia
27.	EUSA PHARMACEUTICALS CC T/A OMBALANTU PHARMACY	Main Road, Pick n Pay Complex (Outapi New Mall), Outapi
28.	EUSA PHARMACUTICALS CC T/A RUACANA PHARMACY	Erf.112-114, Main Road, Ruacana Town Square, Shop 10, Ruacana, Namibia
29.	EXTREME PHARMACEUTICALS CC T/A KAIZZY PHARMACY	7031 Auguste Tanyaanda Street, Ongwediva Medipark, Ongwediva, Namibia

30.	EXTREME PHARMACEUTICALS CC T/A OKATOPE PHARMACY	Dino Hamaambo Street, Okatope Shopping Centre, Eenhana, Namibia
31.	FAMILY LINE PHARMACY CC T/A FAMILY CARE PHARMACY	248 Montreux Street, Auas Hills Retirement Village, Unit 86, Auasblick, Windhoek, Namibia
32.	FREEDOM PHARM CC T/A FREEDOM PHARM ONGUTA	Main Road, Ondangwa, Namibia
33.	FREEDOM PHARMACY CC T/A FREEDOM PHARMACY	1388, Freedom Square Street, Ondangwa (Close to Ministry of Gender Equality), Namibia
34.	FREEDOM PHARMACY CC T/A FREEDOM PHARMACY NKURENKURU	Nkurenkuru Shopping Mall, Shop 14, Nkurenkuru, Namibia
35.	FREEDOM PHARMACY CC T/A OSHIKUKU PHARMACY	Oshikuku Town, Independence Complex, Namibia
36.	GOLDEN PHARMACY CC	8th Avenue, Black Diamond Complex, Shop 3, Oranjemund, Namibia
37.	GREEN-LIGHT PHARMACY CC T/A GREEN-LIGHT PHARMACY	5 Handel Street, Windhoek West, Windhoek, Namibia
38.	GREEN-LIGHT PHARMACY CC TRADING T/A OKURYANGAVA PHARMACY	Oukolele Centre, Ongava Street, Katutura, Windhoek, Namibia
39.	HEALTHRITE PHARMACEUTICAL CC T/A ACCESS CARE PHARMACY	B1 City Mall, Shop 6, Independence Avenue, Namibia
40.	HENTIES BAY PHARMACY	12 Benguela Road 12, Wuillaine Centrum Henties, Henties Bay, Namibia
41.	HEUNIS PHARMA COMPANY (PTY) LTD T/A ELAND PHARMACY	4758 Swarts Road (Next to Total Service Station), Khomas Medical Centre, Windhoek, Namibia
42.	HIGH-VELD PHARMACY	8605 Mamre Street, Soweto, Katutura, Windhoek, Windhoek
43.	HILLCREST PHARMACY	Komalyn Street, Shop 16, Shop F5, Park Foods Mall, Windhoek
44.	HOCHLAND PARK PHARMACY	Amri Shopping Centre (Hochland Park Spar), Hochland Park, Windhoek, Namibia
45.	HOMELAND PHARMACY CC	Ondangwa Main Road, King Kauluma Building, 1326/7, Ondangwa, Namibia
46.	HOMELAND PHARMACY CC T/A PINE PHARMACY	Mvula Complex, Shop No 2, Oshakati, Namibia
47.	INDEPENDENCE PHARMACY	Independence Avenue, Black Chain Shopping Centre, Katutura, Windhoek, Namibia
48.	INTEGRATED PHARMACY ENTERPRISES NAMIBIA CC T/A KUNENE PHARMACY	Main Road, Kaoko Business Centre, Shop 3, Opuwo, Namibia
49.	INTEGRATED PHARMACY ENTERPRISES NAMIBIA CC T/A RIVERSIDE PHARMACY	Rundu Medical Centre, Eugene Kakakuru Street, Rundu, Namibia
50.	INTEGRATED PHARMACY ENTERPRISES NAMIBIA CC T/A RUNDU PHARMACY	Rundu Shopping Mall, Eugene Kakakuru Street, Rundu
51.	INTERSANA	181 Independence Avenue, Windhoek, Namibia
52.	JERE-DEAN PHARMACY	427 Rehobother Street, Block A, Rehoboth, Namibia
53.	JERUSALEM PHARMACY SERVICES CC T/A DEMIREL PHARMACY	Martin Neib Street, Suite 9, Okahandja, Namibia
54.	JFT PHARMACARE CC T/A ONANDJABA PHARMACY	Onamjaba Road, Shatty Complex, Unit 1, Omafo, Okalongo, Namibia

55.	JN HYPER PHARMACY	Paul Van Harte street, Khomas Groove, Shop 5, Ground Floor, Khomasdal, Windhoek, Namibia
56.	KALAHARI PHARMACY	Gustav Voigts Centre, Independence Avenue, Windhoek, Namibia
57.	KAVANGO PHARMACY	Eugene Karukuru Street, North State, Shop 1, Rundu, Namibia
58.	KHABUSER PHARMACY	4 Mittel Street, Keetmanshoop, Namibia
59.	KLEIN WINDHOEK PHARMACY	143 Sam Nujoma Drive (Opposite Puma), Klein Windhoek, Windhoek, Namibia
60.	LANGERHANS PHARMACY CC	7 Independence Street, Ausspannplatz, Windhoek, Namibia
61.	LAO PHARMACEUTICAL CC T/A OKALONGO PHARMACY	3871 Okatana Main Road, Etango Complex, Shop No 22, Oshakati, Namibia
62.	LIFESTYLE PHARMACY CC	Centaurus Road, Maerua Lifestyle Centre, SHOP No 4, Windhoek, Namibia
63.	LITUNGALE INVESTMENT CC T/A KUISEBMUND PHARMACY	Nathaniel Maxuilili Street, Opposite Shop 4, Kuisebmond, Walvis Bay, Namibia
64.	LITUNGALE INVESTMENTS CC T/A MOUNT ZION PHARMACY	180 Beijing Street, Otjomuise, Windhoek, Namibia
65.	LIVING WATERS PHARMACY	92 Windhoek Werner List Street, Roman Catholic Hospital, Windhoek, Namibia
66.	LUDERITZBUCHT PHARMACY	208 Cnr of Bay Road & Schinz Street, Luderitz, Namibia
67.	LUISEN APOTHEKE	181 Independence Avenue, Windhoek, Namibia
68.	LUXURY INV FIFTY-FIVE (PTY) LTD T/A MEDIKOR PHARMACY	Cnr of Germania & Dr Libertine Amathila Street (Erf 465), Otjiwarongo, Namibia
69.	M AND P INVESTMENTS CC T/A QUALITY PHARMACY	463, Northland Medical Centre, Extension 3, Omuthiya, Namibia
70.	M AND P INVESTMENTS CC T/A QUALITY PHARMACY TSUMEB	Shop 26, Tsumeb Mall, Tsumeb, Namibia
71.	M PLUS PHARMACEUTICALS CC T/A BE JUST PHARMACY	Abraham Mashego Street, PLOT 3534 Soweto, Katutura, Windhoek, Namibia
72.	M PLUS PHARMACEUTICALS CC T/A DORADO VALLEY PHARMACY	Cnr of Ara & Bach Streets, Shop 6, Dorado Valley Centre, Windhoek West, Namibia
73.	M PLUS PHARMACEUTICALS CC T/A GOBABIS PHARMACY	94 Church Street, Town Centre, Gobabis, Namibia
74.	M PLUS PHARMACEUTICALS CC T/A M PLUS PHARMACY	15 Middlewick Street, Windhoek North, Windhoek, Namibia
75.	MAERUA PHARMACY	Maerua Lifestyle, Centaurus Road, Windhoek, Namibia
76.	MAIHS PHARMACY	24 Hage Geingob Street, Spar Complex, Otjiwarongo, Namibia
77.	MAIN WAY PHARMACY	Ondangwa Main Road, Times Square Complex, Shop No 2A 1326/7, Ondangwa, Namibia
78.	MARIENTAL PHARMACY	Mark Street 39, Mariental, Namibia
79.	MARSHALL ROCK NUMBER FOUR CC T/A WINDHOEK APTEEK	Independence Avenue, Namdeb building, Windhoek, Namibia
80.	MEDCARE PHARMACY CC	48 Daniel Tjongarero Street, Swakopmund, Namibia
81.	MEDCHEM PHARMACY	Gous Street, Pioneerspark, Van Auerplatz, Windhoek, Namibia
82.	MEDICA PHARMACY CC	Swamed Building, 47 John Meinert Street, Windhoek, Namibia
83.	MEDICINE WORLD GOBABIS (CC)	Gobabis Medical Centre, Gobabis, Namibia
84.	MEDICINE WORLD KATUTURA CC	Independence Avenue, Red Cross Centre (Opposite Shoprite), Katutura, Windhoek, Namibia

85.	MEDICINE WORLD LAFRENZ CC	Monte Cresto Road, Shop No 6, Shoprite Complex, Lafrenz Industria, Windhoek, Namibia
86.	MEDICINE WORLD LAFRENZ CC T/A WESTCARE PHARMACY	Cnr of Sam Nujoma & Beethoven Streets (No 2482), (Opposite Louis Botha Supermarket), Windhoek, Namibia
87.	MEDICINE WORLD ONDANGWA CC T/A BISMARCK PHARMACY	17 Kaiser Wilhelm Street, Swakopmund, Namibia
88.	MEDICINE WORLD ONDANGWA CC T/A ONDANGWA PHARMACY	Off Freedom Square Road, Ondangwa, Namibia
89.	MEDICINE 2000	842 Main Road, Oshakati, Namibia
90.	MEDIPHARM APTEEK	11th Avenue, Namdeb Private Hospital, Oranjemund, Namibia
91.	MEDISUN PHARMACY CC	Wernhill Shopping Centre, Shop 35, Mandume Ndemufayo Street, Windhoek, Namibia
92.	MEDI-WIZE PHARMACY CC T/A MEDI-WIZE GROOTFONTEIN PHARMACY	Hidipo Hamutenya Street 26, No.11, Grootfontein, Namibia
93.	MOLENZICHT PHARMACY CC T/A CENTRAL PHARMACY	667 Cottage Avenue, Tamariskia, Swakopmund, Namibia
94.	MOLENZICHT PHARMACY CC T/A KARIBIB PHARMACY	61 Hidipo Hamutenya Street, Karibib, Namibia
95.	MOLENZICHT PHARMACY CC T/A MOLENZICHT PHARMACY	Tobias Hainyeko Street, Telecom Building Unit 2, (Next to Police Station), Swakopmund, Namibia
96.	MOTJARI PHARMACY CC T/A MOTJARI PHARMACY	262 Martin Neib Avenue, Okahandja, Namibia
97.	MULTIHEALTH INVESTMENT CC T/A TEMMA PHARMACY	Tobias Hainyeko Street, Erf. 947, JP Investment Complex, Shop 5, Eenhana, Namibia
98.	MWELASE INVESTMENTS CC T/A ENKEHAUS PHARMACY	7070 Bahnhofstrase, Windhoek, Namibia
99.	MWELASE INVESTMENTS CC T/A NARRAVILLE PHARMACY	308 Harry Van Reenan Street, Narraville, Walvis Bay, Namibia
100.	MYM INVESTMENT CC T/A EINEEKELO PHARMACY	Joff House, Ondangwa Main Road, Ondangwa, Namibia
101.	NAMIB PHARMACY	195 Independence Avenue, Windhoek, Namibia
102.	NASH HEALTH STYLE CC T/A MONDESA PHARMACY	Woermann Brock Shopping Centre, Shop 7, Mondesa, Swakopmund, Namibia
103.	NATU PHARMACEUTICALS CC T/A OSHANA PHARMACY	Kapia Health Centre, Behind FNB, Ondangwa, Namibia
104.	NIEMEYER APOTHEKE	63 Independence Avenue, Windhoek, Namibia
105.	NOVECY PHARMACY CC	Heliodoor Street, Unit 1, First Floor, Helio View, Eros, Windhoek, Namibia
106.	OASIS PHARMACY	Khomas Hochland Street, Kuisebmond Family Practice, Kuisebmond, Walvis Bay, Namibia
107.	OCEAN PHARMACY CC	Post Street Mall, Mutual Platz Building, Windhoek
108.	OCEAN PHARMACY CC T/A KATIMA PHARMACY	Hospital Road, Social Security Building, 4th Door, Katima Mulilo, Namibia
109.	OCEAN PHARMACY CC T/A OCEAN PHARMACY NORTH	199 Ooivaar Street, Windhoek North, Windhoek, Namibia
110.	OKAHANDJA PHARMACY	261 Martin Neib Street, Okahandja, Namibia
111.	OKAHAO PHARMACY	308-311 Unit 5 Chicco Building, Okahao, Namibia
112.	OKONGO PHARMACY	Main Road, Okongo, Namibia
113.	OLUPANDU PHARMACY CC T/A OLUPANDU PHARMACY	25 Main Road, Sun Square Mall, Ondangwa, Namibia
114.	OLYMPIA PHARMACY	Jason Hamutenya Ndadi Street, Lolo Park, Olympia, Windhoek, Namibia

115.	OMUSATI PHARMACY	Tsandi Road, Nedbank City Centre, Shop 2, Outapi, Namibia
116.	ONEHEALTH PHARMACY CC T/A ONEHEALTH CENTRAL PHARMACY	209 Ooivaar Street, Windhoek West, Windhoek, Namibia
117.	ONEHEALTH PHARMACY CC T/A ONEHEALTH PHARMACY	279 Ooivaar Street, Windhoek North, Windhoek, Namibia
118.	ONEHEALTH PHARMACY CC T/A ONEHEALTH WALVISBAY PHARMACY	Nathaniel Maxuilili Street, Opposite Shop 4, Kuisebmond, Walvis Bay, Namibia
119.	ONGWARI PHARMACY CC	96 Willem Zerua Road, Omaruru, Windhoek
120.	OSHAKATI PHARMACY CC T/A OSHAKATI PHARMACY	749 Main Road, Oshakati, Namibia
121.	OSHIKANGO PHARMACY	Intertenational Commercial & China Centre, Ondangwa, Namibia
122.	OSHIKOTO PHARMACEUTICALS CC T/A OSHIKOTO PHARMACY	419A 3rd Avenue 419A, Wellness Centre, Tsumeb, Namibia
123.	OTAVI MOUNTAIN INVESTMENT CC T/A OTAVITA PHARMACY	73 Republic Street, Otavi, Namibia
124.	OTJOROKA TRADING ENTERPRISE CC T/A OMAHEKE PHARMACY	485 Church Street, Woermann Brock Complex, Shop 6, Gobabis, Namibia
125.	OTJOROKA TRADING ENTERPRISES CC T/A HELAO NAFIDI PHARMACY	Main Road, Shop 20, Namchi Park Complex, Oshikango, Namibia
126.	OTJOROKA TRADING ENTERPRISES CC T/A MEDULETU PHARMACY	Nathaniel Maxuilili Street, Opposite Shop 4, Kuisebmond, Walvis Bay, Namibia
127.	OUKOLELE PHARMACY CC T/A OUKOLELE PHARMACY	Unit 1, Ongwediva Medipark Square, Ongwediva, Namibia
128.	OUTAPI PHARMACY	Tsandi Road, Town Square Complex, Shop no. 4, Outapi, Namibia
129.	OUTJO PHARMACY	19 Hage Geingob Street, Outjo, Namibia
130.	OUTREACH PHARMACY CC T/A OUTREACH PHARMACY	No. 21 Cnr of Nickel & Titatium Streets, Prosperita, Windhoek, Namibia
131.	PHARMACY AT LADY CC T/A PHARMACY AT LADY	Cnr of Frankie Fredericks & Ombike Drive, Kleine Kuppe, Windhoek, Namibia
132.	PHARMACY INTERNATIONAL	Sam Nujoma Drive, Woermann Brock Centre, /Ae //ams Mall, Windhoek Namibia
133.	PIONERSPARK PHARMACY	Fritsche Street, Baines Centre, Pioneerspark, Windhoek, Namibia
134.	POLA PHARMACY CC	Omwandi Road Main Road, Punyu Complex, Shop 9, Ondangwa, Namibia
135.	POLA PHARMACY CC T/A ONANDJOKWE PHARMACY	Onandjokwe Hospital, Room 1, Ward 10, Oniipa Ondangwa, Namibia
136.	POLA PHARMACY CC T/A PHARMACY 2000	Ondangwa Main Road, Punyu Show Rooms, Ondangwa, Namibia
137.	POLA PHARMACY CC T/A POLA 24 PHARMACY	1628 Omwandi Road Main Road, Pola Medical Centre, Ondangwa, Namibia
138.	POMBILI PHARMACY CC T/A MEDICARE PHARMACY	Olundago Complex Street, Oshakati East, Behind Yetu Complex, Oshakati, Namibia
139.	POMBILI PHARMACY CC T/A RITE - MED PHARMACY	Olundago Town Square Complex, Opposite Library, From Social Security Office, Oshakati, Namibia
140.	PREMED PHARMACEUTICALS CC T/A PRIME PHARMACY	Helao Nafidi Street, Unit 1003, Continental 2, Ongwediva, Namibia

141.	PRO PARK PHARMACY CC	666 Cottage Avenue, Tamariskia, Swakopmund, Namibia
142.	PUZZLE INVESTMENTS NUMBER 38 CC T/A WATERBERG PHARMACY	Hindenburg Street, Unit 7, Otjiwarongo, Namibia
143.	REHOBOTH MALL PHARMACY	825 & 826 Sparrows Street, Rehoboth Shopping Centre, Shop 16, Rehoboth, Namibia
144.	REHOBOTH PHARMACY	9 Church Street, Rehoboth Medical Centre, Block B, Rehoboth, Namibia
145.	REICHS PHARMACY	230 Bismarck Street, Luderitz, Namibia
146.	SANTA CLARA PHARMACY OSHIKANGO CC	Namacunde Street, Shoprite Centre, Shop 2, Oshikango, Namibia
147.	SEIZE THE MOMENT INV 23 CC T/A ETOSHA PHARMACY	1433 Omeg Allee Street, Tsumeb, Namibia
148.	SEIZE THE MOMENT INV NO 22 CC T/A TSUMEB PHARMACY	543 Main Street, Tsumeb, Namibia
149.	SENTRUM PHARMACY	Cnr of 12th Road & Theo Ben Gurirab Street, Walvis Bay, Namibia
150.	SOWETO PHARMACY	Plot 3534, Abraham Mashego Street, Soweto, Katutura, Windhoek, Namibia
151.	SWAKOPMUND INVESTMENT CC T/A DOLPHIN PHARMACY	48 Daniel Tjongarero Street, Swakopmund, Namibia
152.	SWAKOPMUNDER APOTHEKE	26 Sam Nujoma Avenue, Swakopmund, Namibia
153.	TAUBEN GLEN PHARMACY CC	Cnr of Kingfisher & Oriole Streets, Hochland Park, Opposite Woermann Brock, Pelican Square, Windhoek, Namibia
154.	TEE KAY PHARMACY CC	8086 Independence Avenue, Katutura, Windhoek, Namibia
155.	THE NAMIBIAN ONCOLOGY CENTRE (PTY) LTD T/A ONCOLOGY PHARMACY	3 Helidoor Street (Next to Paramount Hospital), Eros, Windhoek, Namibia
156.	TINSEL PHARMACY	2124 Independence Avenue, Cymot Building, Katutura, Windhoek, Namibia
157.	UUKALINAWA PHARMACY CC	3871, Etango Mall, Shop 22, Okatana Main Road, Oshakati, Namibia
158.	VICTORIA PHARMACY	11 Frans Indongo Street, Windhoek, Namibia
159.	VISRIVIER PHARMACY	872 Hendrick Witbooi Avenue, Mariental, Namibia
160.	VOBACO PHARMACY	19 Hage Geingob Avenue 19, Tungaleni Health Centre, Grootfontein, Namibia
161.	WALVIS BAY PHARMACY CC	122 Sam Nujoma Avenue, Walvis Bay, Namibia
162.	WANAHEDA PHARMACY AND CBD PHARMACY CC T/A CBD PHARMACY	2799 Independence Avenue, Shop 8, Katutura, Windhoek, Namibia
163.	WANAHEDA PHARMACY AND CBD PHARMACY CC T/A CBD PHARMACY 2	Ellerines Parking, Cnr of Frans Indongo & Kasch Streets, Windhoek, Namibia
164.	WAP PHARMACARE CC T/A BOM DIA MAIN PHARMACY	2167 Main Road, Shop 4, Ya Toivo Lifestyle Centre, Ondangwa, Namibia
165.	WAP PHARMACARE CC T/A KAVMED PHARMACY	901 Eugene Kakukuru Street, Shop 1, Main Road Opposite Motevec Ravic Building, Rundu Commercial Centre, Rundu, Namibia
166.	WAP PHARMACARE CC T/A KHOMASDAL PHARMACY	4850 Kannas Street, (Next to Beukus Spar), Khomasdal, Windhoek, Namibia
167.	WAP PHARMACARE CC T/A NORTH CARE PHARMACY	Game Complex, Oshakati, Namibia
168.	WAP PHARMACARE CC T/A NORTHMED PHARMACY	Ondangwa Main Road, Times Square Complex, Shop No 2A, Ondangwa, Namibia

169.	WAP PHARMACARE CC T/A NORTHWAY PHARMACY	308-311 Chicco Complex, Shop 5, Okahao, Oshakati, Namibia
170.	WELWITSCHIA PHARMACY	Dr Puth Harris Drive, Walvis Bay Medipark, Walvisbay, Namibia
171.	WENDJIZUVA PHARMACY (PTY) LTD T/A MEDI-PILL PHARMACY	353 Independence Avenue 353, Windhoek, Namibia
172.	WENDJIZUVA PHARMACY (PTY) LTD T/A OKAKARARA PHARMACY	559 John Tjikuu Street (Main Street), Okakarara, Namibia
173.	WESTLANE PHARMACY CC T/A WESTLANE PHARMACY	Cnr of Scheppmann Street & Hochland Road, Westlane Shopping Centre, Pioneerspark Extension 1, Windhoek, Namibia
174.	WEST-RIDGE PHARMACY CC T/A WEST-RIDGE PHARMACY	3164 Mangan Street, Okahandja Shopping Centre, Okahandja, Namibia
175.	WINDHOEK WEST PHARMACY CC	24 Rhino Street (Street of Rhino Park Hospital), Windhoek West, Windhoek, Namibia
176.	ZANELEH PHARMACEUTICALS CC T/A MEDI-PLUS PHARMACY	Werner List Street, Gutenberg Platz, Shop 4, Windhoek, Namibia
177.	ZAVI - MED PHARMACY CC T/A ZAVI - MED PHARMACY	8 Ombika Street, Unit 3, LPPH Medical Suites West, Kleine Kuppe, Windhoek, Namibia
178.	ZAMBEZI/KATIMA PHARMACY	8 Hage Geingob Street, Erf. 2884-7, Zambezi Shopping Centre, Shop 16, Ground Floor, Katima Mulilo, Namibia