

Feedback Paper of the European Association of E-Pharmacies (EAEP) to the Roadmap on a 'European health data space'

February 2021

The European Association of E-Pharmacies (EAEP) would like to submit initial remarks on the combined evaluation roadmap/Inception Impact Assessment on a European health data space (EHDS). As e-pharmacies, building on extensive pharmaceutical expertise and experience, we already have a digital health track record based on high quality data and a strong digital infrastructure across borders. We therefore know that the development of a European single market for digital health and a true European Health Union, of which the EHDS forms an integral part, will improve access to high-quality health care across the EU, benefitting European patients. We therefore strongly welcome the plans of the European Commission, as outlined in its Work Programme 2021, to set up the EHDS.

Already before the Corona crisis, the digitalisation of the health sector was well under way, only to be further accelerated by the current pandemic acting as a catalyst. Digital technologies are now rolled out at all levels in society with the aim to provide solutions to improve the health of citizens and our healthcare systems. Corona also reminds us, in no uncertain times, that health challenges do not stop at national borders and that a national answer alone cannot and will not suffice. Therefore, the development of a European single market for digital health provides the solution to increase accessibility, availability and affordability of high-quality healthcare. This also requires strategic thinking in terms of how to deal with health data in a harmonised and integrated manner to safeguard the health of Europe's citizens.

The EAEP puts forward the following elements for the successful rollout of the EHDS:

- Set up a **regulatory framework at EU level** which lays down the principles of how to deal with personal data related to one's individual health. Such an EU regulatory framework would do away with the vast amount of heterogeneous legal bases and would thus supersede the current fragmented national treatment of (access to) health data.
- Ensure an **open, transparent EHDS** which guarantees one's individual data privacy on the one hand, but also ensures secure and safe access of those data for healthcare professionals, like doctors and pharmacists to allow for fast screening, advise and better personalised treatment, therapy and services for patients.
- Enable a framework in which the **full potential of artificial intelligence and big data** are harnessed.
- Improve the **cross-border exchange of health data for healthcare**, with the aim to further develop and accelerate **e-prescriptions** and leverage the electronic health record at European level. In light of the development of a European Health Union, we would suggest in the long term to make e-prescriptions non-voluntary and thus binding as a principle, creating a level playing field across Europe for patients to obtain their medicines in a safe and secure way and benefit from tele-medical consultations, anywhere in the EU.
- Enable and safeguard the **free movement and provision of health services and products** to make high-quality healthcare available, accessible and affordable across the European Union. From our experience this will require strengthening enforcement of existing rules as well as legislative change, building on the cross-border healthcare directive and addressing areas still acting as barriers to patients seeking healthcare across borders. Suggestions for the free movement and provision of health services and products the EAEP proposes are:



- EAEP suggests to establish an **EU-wide authentication system** for care providers in order to enable cross border health care. Continuous, electronic access to health data should not only be offered to patients, but also to care providers by means of one secure login possibility.
- EAEP suggests a speedy **implementation of national contact points** on Member State level. In order to fully benefit from a common and interoperable Health Data Space, it is necessary to link national e-health systems to a common EU e-health infrastructure.

We would be happy to exchange views with the European Commission on how to create the EHDS. As e-pharmacies, we see ourselves as a central and integral player to ensure the success of the EHDS with as its main aim to improve the health of Europe's citizens.

About EAEP:

We strengthen the European healthcare system by ensuring better access to health-related products and services for people across the continent. As the Association of European E-Pharmacies (EAEP), we represent the interests of our members and safeguard the needs of our members' patients and customers. We inform the public in a transparent manner, enter into a dialogue with politics, business and market partners and leverage our concepts to strengthen the European healthcare sector and lower costs through digitalisation. The members of the EAEP are pioneers in providing digital solutions that continuously improve the quality, safety and efficiency of healthcare for Europeans. We combine our members' voices in position papers and encourage interaction and knowledge sharing.

More information: <https://www.eaep.com>