

## Feedback Paper of the European Association of E-Pharmacies (EAEP) on ‘Europe’s digital decade: 2030 digital targets’

March 2021

The European Association of E-Pharmacies (EAEP), formerly “EAMSP”, welcomes the opportunity to contribute to the forthcoming Communication on the ‘Europe’s digital decade: 2030 digital targets’. As e-Pharmacies, we are experienced digital players which have digital transformation on top of our minds in our daily business to ensure that our **customers and patients are empowered to live healthy lives**. It is our vision that Europe becomes the digital global leader which has the capacity and technological capabilities to act independently and autonomously, providing optimal conditions for its citizens to **health(care), wellbeing, safety and security the “European way”**.

The EAEP welcomes that both the Multiannual Financial Framework and the Next Generation EU recovery plan have investments in digital transformation as one of two top priorities (next to the green transition). These multi-year plans should be underpinned by a clear vision, policies and instruments which lead to a strong recovery from the current COVID-19 crisis and hence renewed growth and enhanced competitiveness. As e-pharmacies, we have witnessed that COVID-19 on the one hand has laid bare the weaknesses of Europe’s healthcare system, from the production of pharmaceuticals and vaccines to the fast and reliable supply of medication to patients; on the other hand, the crisis has also accelerated digitalisation, specifically digital consumption and customer behaviour, where **e-pharmacies have demonstrated their contribution to the continuous safe and secure supply of medications by reducing physical contacts, meeting the needs of its customers, including in remote and rural areas**. Nevertheless, in the healthcare sector in general, the digital pace is still slow. The McKinsey [report](#) ‘Shaping the digital transformation in Europe’ (2020) states that health and pharmaceuticals remain among the least digitised sectors, due to for example a lack of unified data and digital infrastructure, as well as regulatory barriers related to health and patient data.

In this paper, we would like to underline some key points which we think should be part of the digital transformation vision for 2030, from the perspective of e-pharmacies:

- **Make digital work:** the EC’s [Communication](#) ‘Shaping Europe’s Digital Future (2020) states that true digital transformation can only take place if European citizens and businesses have **trust in the fact that their applications and products are secure**. As e-Pharmacies, delivering medication and services in a secure way is of utmost priority, and as registered pharmacies, our members display the EU common logo, a certification of the trust placed in us. We do go further, leveraging digital technologies. For example, we scan every single article and match-check it with the client order, but we also offer traceable packages with every carrier to monitor transport. We have built data bases enabling us to cross-check medication interactions more efficiently and safely electronically. These examples are underpinned by technology, which is advancing at a rapid pace. We believe that technology is not an end in itself, but a means to an end. The EAEP sees the value of technologies such as AI, robotics and advanced neural machine learning techniques to even deliver better services and quality. Therefore, we would like to see that the EU keeps investing in aforementioned technologies with sufficient budget while at the same time taking care of a robust security framework, considering also the legal and ethical implications of these technologies.
- **Sharing is caring:** Obtaining reliable and trustworthy data is key to delivering good healthcare services and medicines to our customers. e-Pharmacies have a track record

in dealing with health data in a safe way. We comply with the General Data Protection Regulation (GDPR) to ensure that patients can obtain medicines and medical aides discreetly and without disclosing sensitive personal health data to the public. E-pharmacies neither collect, nor process, nor transfer any kind of personal data without a legal basis. Yet **if we want to fully reap the fruits of digital, primary data for the delivery of healthcare should be shared and accessed cross-border also by healthcare and service providers such as e-Pharmacies**. This is echoed by the McKinsey report confirming our strong belief that Europe-wide sharing of health data would improve healthcare outcomes, illustrated by an analysis in the report of France and Germany in which major efficiencies due to digitalisation can be achieved. Sharing of health data should therefore be facilitated at the EU level. The EAEP has [published](#) its position on the European Health Data Space (EHDS) which the EC plans to roll out by the end of 2021, which outlines in more detail why the EAEP very much welcomes the EHDS.

- **A level playing field for everyone:** If Europe wishes to keep and maintain a well-functioning internal and digital single market, a true level playing field needs to be created for all EU companies and EU consumers. EU legislation enabling e-commerce activities should support EU companies, big and small, and prevent that such legislation aimed at gatekeepers and dominant positions produces collateral and unintended effects, by burdening and limiting the intended digitalisation the EU's economic base. EU law should positively contribute to the development of EU companies and provide them with equal opportunities. The EAEP welcomes the recently published Digital Services Act (2020) to which the EAEP has provided [input](#), and recalls the crucial importance of preserving the country of origin principle to safeguard the Single Market. Moreover, remaining regulatory barriers and practical obstacles in the health domain must be addressed, as already outlined in the EC's [Communication](#) 'Identifying and addressing barriers to the Single Market' (2020) and the accompanying Staff Working Document ([SWD](#)). The full potential of electronic health records (EHRs) and e-prescription will not be realised if national regulations regarding fulfilment of e-prescriptions remain fragmented across the EU. This is confirmed in the EC's Communication 'Shaping Europe's Digital Future' (2020), which refers to the potential of EHRs based on a common European exchange format to give European citizens secure access to and exchange of health data across the EU.
- **Put people at the heart of digital transformation:** policies and programmes can only achieve success if human capital is the driving force behind it. Continued investments need to be made in upskilling and reskilling Europe's pupils, students and workforce to ensure that the knowledge and expertise is there to drive key technologies forward and give European digital champions the room to grow. The EAEP welcomes the Digital Education Action [Plan](#) 2021-2027 (2020) to give digital skills a boost, but is worried that not a sufficient amount is done yet. According to the Digital Economy and Society Index (DESI) Human Capital [report](#) (2020), despite improvement in basic digital skills and advanced skills, a shortage of ICT specialists on the labour market still exists. 64% of large enterprises and 56% of SMEs that recruited ICT specialists during 2018, reported that vacancies for ICT specialists are hard to fill. Hence, if the EU wants to be a digital frontrunner, investments in education and skills must not lag behind. As e-Pharmacies, it is our daily business to integrate new digital technologies to be mastered by anyone in the company, matching their role within the company. Without taking care of our employees, we cannot live up to delivering the quality we expect to provide to our customers and patients on a daily basis. And needless to say, patients with a sufficient level of digital skills are empowered and confident to take full control of their personal health, while health services are increasingly offered online.



#### 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 digitalization. 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>