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EUROPEAN ASSOCIATION OF  
E-PHARMACIES

EAEP ANNUAL REPORT 2023

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# Enhancing availability, accessibility, and affordability of healthcare

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# Foreword

2023 was a year characterised by momentum. Other years have certainly been outstanding for the EAEP but last year was an exceptionally successful one. The association is proud of the keen interest coming from online pharmacies across Europe that has grown our membership to an impressive 28 members. However, when it comes to quality, not just quantity, the proof is in the pudding.

Thanks to our growing membership base, we have gained additional insight during our internal discussions that fed into the broader, structured advocacy and commitment to key topics. This is how we ensure internal alignment on the views from our sector in order to speak with one voice, ultimately informing EU political stakeholders, associations and market players on who the online pharmacies are, what they do and what they stand for.

Why is this work so important? Because regulatory frameworks to ensure that online pharmacies are treated on equal footing are being discussed and debated now. After all, online pharmacies are a pharmacy like any other – just online as the name implies.

In 2023, we saw EU institutions moving ahead swiftly to regulate the European Health Data Space (EHDS) which they hope to finalise in 2024, just in time for the elections. However, the long-term, more exciting developments, since they are directly related to the pharmacy sector and to our DNA, are the European Commission's regulation and directive proposals to revise the EU Pharmaceutical Legislation. We see this as a unique, once-in-a-generation opportunity to ensure changes in EU law that will make our business fit for the future. We see this as a much-needed development, and we paid tribute to this important legislative package during our annual event in Brussels on 26th October. With digital health becoming more and more the norm, legal frameworks must move forward as well. We want to make sure we are part of the discussion and look forward to engaging with as many players as possible to make this happen.



**Olaf Heinrich**  
President EAEP



**Walter Hess**  
Vice-President EAEP

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# 2023 Milestones



## FEBRUARY

EAEP speaking slot at the Dynamic Spectrum Alliance event on delivering an inclusive, sustainable, connected life for Europeans

Inish Pharmacy joins the EAEP

Subra joins the EAEP

## MAY

EAEP joint statement on the European Health Data Space

EAEP feedback to the EDQM draft recommendations on the online sale of medicines

## JANUARY

- EAEP fellow-directorship of the Alliance for Safe Online Pharmacy in the EU is renewed;
- Soin et Nature joins the EAEP
- Apons.eu joins the EAEP

## MARCH

- Publication of 2022 EAEP Annual Report

## APRIL

- EAEP General Assembly and public event in Berlin on the European Health Data Space
- Publication of EAEP feedback to the adoption of the Packaging and Packaging Waste Regulation proposal
- Delmed and Sparmed join the EAEP

## JUNE

- EAEP presentation at the 2023 ePharmacy Summit in Athens, Greece

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## SEPTEMBER

Publication of EAEP feedback to the proposal for a revision of the EU Pharmaceutical Legislation

EAEP presentation at the 2023 Life Sciences Baltics event

EAEP meeting with the Lithuanian Ministry of Health

Creation of new internal Committee on Cybersecurity and Data Protection

Disapo joins the EAEP

Vamida joins the EAEP

## DECEMBER

Publication of EAEP position paper on medicine shortages

Adoption of EAEP Code of Conduct for suppliers

## JULY

- EAEP intervention at the IAPO event on eHealth
- Publication of the EU Health Coalition Manifesto for a Healthier Europe
- Pharmacy2U joins the EAEP
- Apotheka joins the EAEP

## AUGUST

- Publication of EAEP position paper on German draft digital law
- EAEP joins All Policies for a Healthy Europe

## OCTOBER

- EAEP General Assembly and public event on the EU Pharmaceutical Legislation
- Launch of EAEP campaign on the availability, accessibility, and affordability of medicines
- ApoPro joins the EAEP

## NOVEMBER

- Publication of EAEP proposed amendments to the proposal for a revision of the EU Pharmaceutical Legislation
- Publication of EAEP survey on citizens' appreciation of the option to access Rx medicines online
- Meeting with the Cabinet of Commissioner for Health and Food Safety Stella Kyriakides
- EAEP presentation at the 2023 Digital Health Society Summit
- eFarma joins the EAEP

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Figure 1 EEA/EU/UK/CH countries allowing online sale of medicines

<sup>1</sup>Der große DatamedIQ Recap des OTC-Versandhandels 2023

<sup>2</sup><https://ligoniukasa.lrv.lt/en/news/good-news-for-patients-prescription-medicines-can-already-be-purchased-online/>

<sup>3</sup>The online sale of medicines is envisaged at the EU level by different pieces of legislation. **Directive 2011/62** – Falsified Medicines Directive – addresses the online sale of over-the-counter (OTC) medicines and sets out principles and rules to limit the spread of falsified medicines and keep the patients safe. In parallel, **Directive 2001/83** – Community Code – details the minimum criteria and standards for the online sale of medicines, both OTC and prescription medicines (Rx), establishing the legal framework for online pharmacies to operate in Europe. According to the Community Code, Member States are empowered to limit the online sale of Rx on their territory.

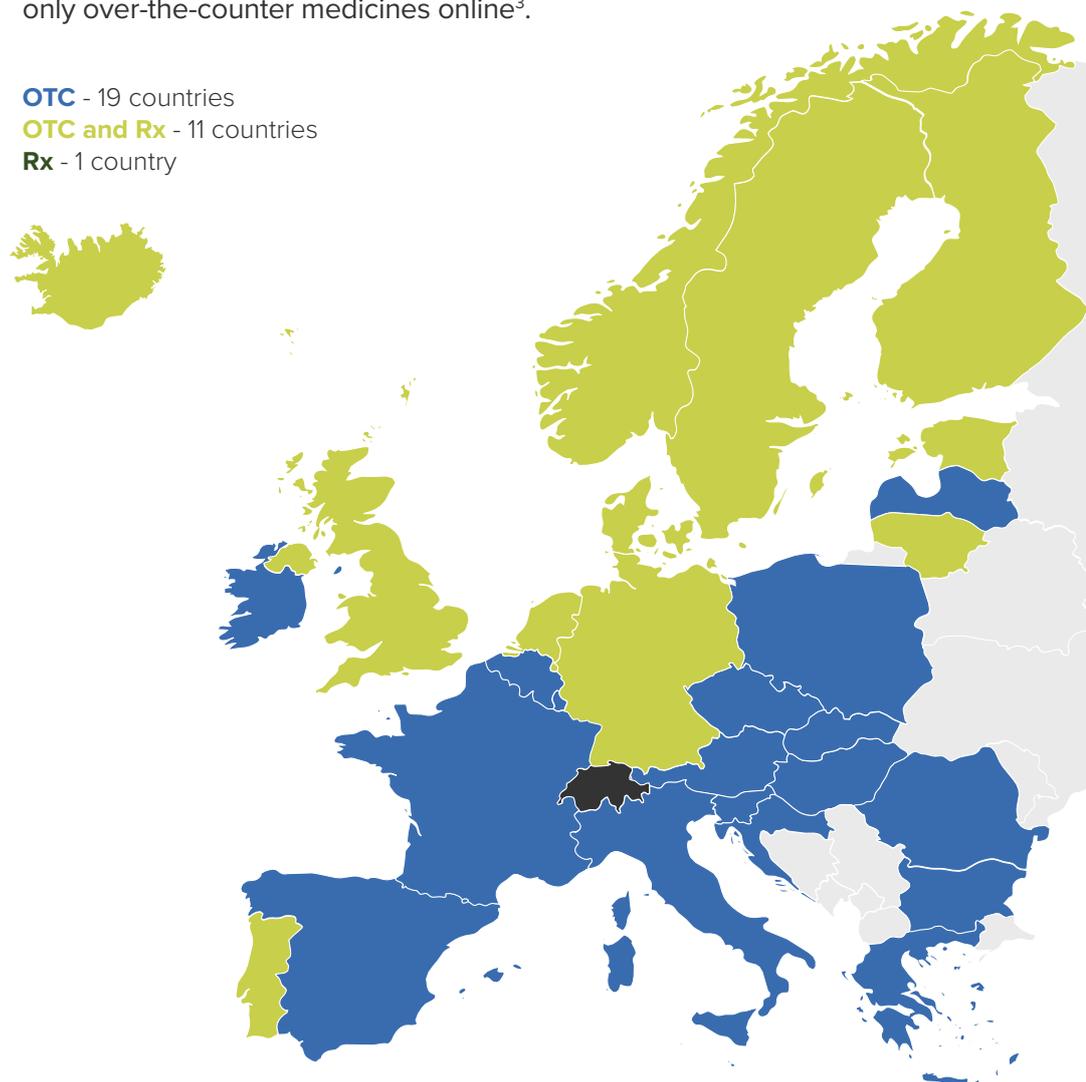
# Overview of the e-pharmacy market

The e-pharmacy market in 2023 has experienced a continued growth in several regions of Europe. In Italy alone, recent data show that the e-pharmacy sector had a turnover of 913 million Euros in 2023, with double-digit growth (+20.3%) compared to 2022; In Germany the mail order of consumer healthcare grew with 7.7% to a turnover of 13.71 billion Euros.<sup>1</sup> Nonetheless, figure 1 shows a clearly fragmented European continent, demonstrating the disparities in the current state of play when it comes to the availability of medicines online for patients. Indeed, while countries coloured in green – namely those where the legal framework allows patients to obtain their prescription medicines from registered online pharmacies – are growing (the latest one opening the market was Lithuania in 2022)<sup>2</sup>, the overall landscape is still dominated by countries coloured in blue – namely those where the legal framework allows patients to obtain only over-the-counter medicines online<sup>3</sup>.

**OTC** - 19 countries

**OTC and Rx** - 11 countries

**Rx** - 1 country



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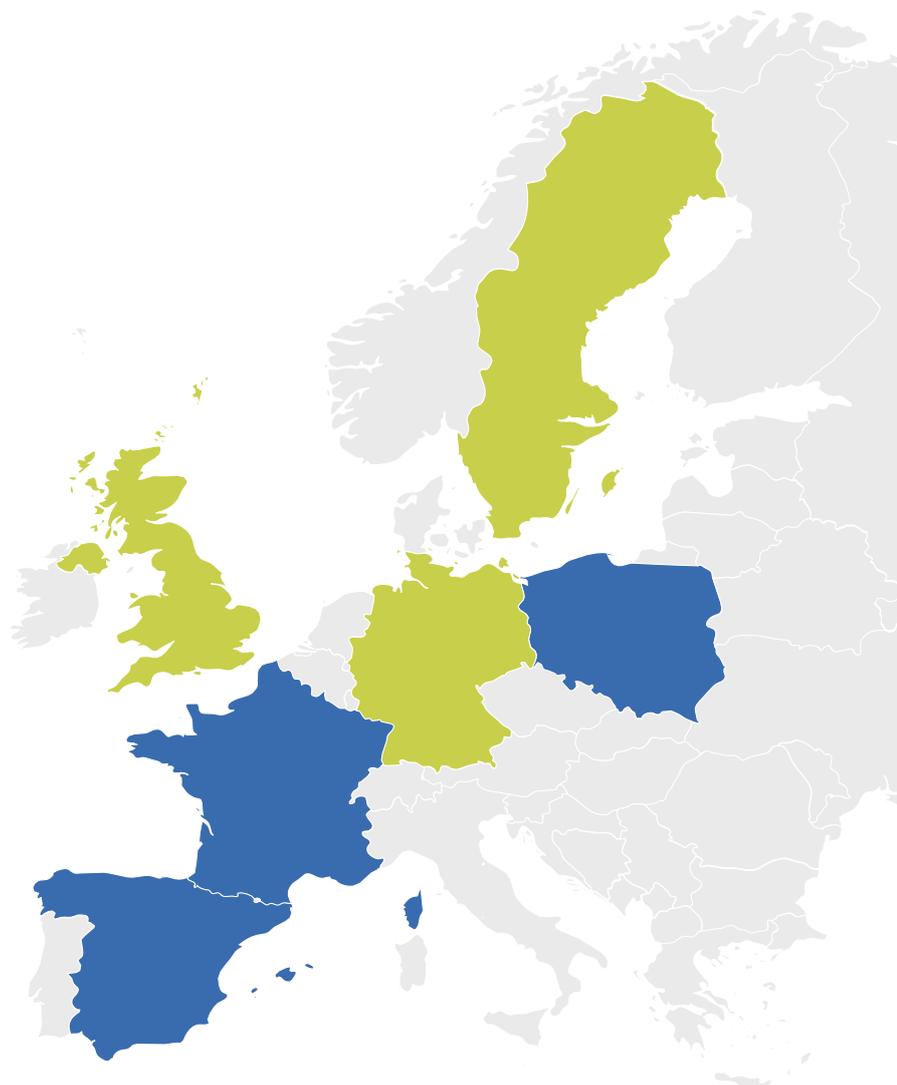
In spite of the current state of play, citizens in Europe are pushing for a different approach, one that would make Europe coloured fully in green. In fact, a study commissioned by the EAEP to DatamedIQ/Appinio, looking at 5,000 citizens in France, Poland, and Spain, highlighted that 89.4% of respondents believe that online pharmacies should be permitted to deliver prescription medicines. If allowed, 85% of them would buy prescription medicines online. On the other hand, in Germany, Sweden, and UK, where obtaining prescription medicines online from registered e-pharmacies is already permitted, 64% of respondents declared to have purchased through this channel more than once, with 41% of them buying both over-the-counter and prescription medicines.<sup>4</sup>

These data clearly testify for the growing need and willingness of patients to make the most of existing, safe digital solutions to access their healthcare. Never before institutions and authorities had such evident and unequivocal data calling for an adjustment of the legal frameworks across Europe, finally establishing a level playing field where registered online pharmacies can fully support their patients.

Figure 2 EAEP survey on citizens' appreciation of the option to purchase Rx online

Countries where the online sale of prescription medicines **is possible, is not possible**

- 64% of respondents have purchased from an online pharmacy more than once
- Only 20% has never purchased online
- 40% buy OTC, 41% both OTC and Rx, 19% only Rx
- 60% of respondents that have never purchased from an online pharmacy are open to considering this option in the future
- 90% of respondents believe that online pharmacies should be permitted to deliver prescription medicines
- 85% of them would buy prescription medicines online if allowed



<sup>4</sup>[https://www.eaep.com/uploads/survey-on-citizens-appreciation-rx-online.pdf?\\_cchid=d152fe42751f6b5afc59b5f354229492](https://www.eaep.com/uploads/survey-on-citizens-appreciation-rx-online.pdf?_cchid=d152fe42751f6b5afc59b5f354229492)

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While Europe is home to diverse e-pharmacy markets, EAEP members still experience common challenges and discriminatory treatment affecting the online domain vis-à-vis the offline one. To address these criticalities, throughout 2023 the EAEP has engaged in conversations with a diverse spectrum of stakeholders with a view to showcasing the abovementioned findings and presenting policy recommendations that follow best practices in the 11 countries in green (figure 1) where the online sale of prescription medicines has been a successful practice for many years.

Regrettably, the fragmented landscape results in barriers for patients to choose their preferred pharmacy and access their medication according to their needs (e.g. chronic patients, patients with mobility issues or living in rural areas).

**As the worldwide online pharmacy market is predicted to grow at a 10.6% (CAGR) rate over the next several years, with a total market value rising by 65% by 2028<sup>5</sup>, stakeholders and business partners in Europe will also confront new trends and needs of patients.**

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<sup>5</sup><https://www.smilebi.co.uk/studies-lps/e-pharmacy-study-2024-france>



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# Enhancing availability, accessibility, and affordability of healthcare

## Digital Health

Throughout the past year, digital health remained a key topic for discussions by policymakers and authorities both at the EU and Member State levels. Within this domain, among different themes on the political agenda one stood out: the European Health Data Space (EHDS)<sup>6</sup>. A key pillar of the European Health Union,<sup>7</sup> this new Regulation – proposed in May 2022 – has the ambition to improve healthcare delivery across the EU, by empowering people to control their health data in their home country or across borders. The new rules are expected to offer a consistent, secure, trustworthy and efficient framework for the sharing and use of health data by patients, healthcare professionals, researchers, public institutions or industry. For pharmacies and other healthcare professionals, this will guarantee access to meaningful information with a view to ensuring the best possible health outcome.



<sup>6</sup>[https://health.ec.europa.eu/ehealth-digital-health-and-care/european-health-data-space\\_en](https://health.ec.europa.eu/ehealth-digital-health-and-care/european-health-data-space_en)

<sup>7</sup>[https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/promoting-our-european-way-of-life/european-health-union\\_en](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/promoting-our-european-way-of-life/european-health-union_en)

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While constituting an unprecedented opportunity for healthcare systems across Europe to embrace digitalisation and finally make the most of existing digital solutions, the EHDS builds on rigorous data privacy, interoperability and security requirements. As a result, the dossier represented a key pillar of the EAEP's internal and external activities. Indeed, the new legislation has been heavily debated in 2023: continued discussions to reach a common position both in the European Parliament and in the Council of the EU resulted in the adoption, in late-2023, of final negotiating positions by both institutions – with a view to the final agreement in 2024.

In this context, the EAEP has worked to maintain a level-playing field among healthcare providers in Europe when it comes to accessing patients' health data towards a better health outcome: in mid-2023, a coalition of signatories led by the EAEP called on EU policymakers to ensure that the new rules guarantee access by all healthcare providers to the infrastructure made mandatory by the EHDS, leave no patient behind. The technical input of the EAEP E-Health Committee has been crucial with a view to providing the necessary information, data, and best practices on how e-pharmacies operate digitally to support their patients. The Committee – composed of digital health experts across the EAEP membership – met once per quarter, aiming to address and brainstorm on specific provisions of the EHDS, exchange views with external speakers, and produce actionable material and papers. In this context, Committee members tackled topics such as the MyHealth@EU infrastructure for cross-border health data sharing, and the EU Digital Identity Wallet (with a focus on the e-prescriptions use case).

“ Our working group on digital health topics has a double significant value: keeping members informed about upcoming trends, developments and legislation affecting the digitalisation of healthcare – a key pillar of e-pharmacies; and constituting a forum to share ideas, data, and positions on how to respond to those trends. We contribute daily to advancing the online pharmacy sector in Europe. ”

**Martin Bumm**  
Chair of the EAEP  
E-Health Committee

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# Cybersecurity and Data Protection

The European e-Health sector, as well as all European businesses operating online, face increasing challenges when it comes to cybersecurity and data protection. An alarming number of more and more sophisticated cyber threats and attacks are targeting sensitive data, including patient information. This is especially relevant in the field of health where European online pharmacies deal with sensitive data of their patients in a trustful manner. There is an evolving demand for compliance from the European authorities. Rapidly evolving technology landscape make it challenging to keep up with security measures. Furthermore, the lack of harmonization among EU Member States in regulations and practices poses a challenge for European businesses.

The Cybersecurity and Data Protection Committee has been established in 2023 as the Association's fourth Committee in order to address challenges and opportunities in this domain. Focus topics of the Committee's work are the Revision of the General Data Protection Regulation as well as the Network and Information Security Directive (NIS 2 Directive), which aims to enhance the overall level of cybersecurity in the EU by requiring essential service providers, including online pharmacies, to implement security measures and report incidents. The activity of the Committee contributed to the ongoing policy-making process at the EU level. Following its successful establishment in 2023, the Committee will intensify its activities and meetings with relevant stakeholders throughout 2024.

“ The security and protection of sensitive health data is essential for European online pharmacies to gain and maintain the trust of their patients and customers. Cybersecurity is an indispensable aspect of ensuring the integrity and confidentiality of patient data while meeting regulatory requirements. Growing challenges need common approaches. Within our Committee, we aim at sharing knowledge and thereby continuously expanding our expertise. ”

**David Mantock**  
Chair of the EAEP  
Cybersecurity and  
Data Protection Committee

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## Pharmacy

The current EU mandate, which started in 2019, saw an overall intensification of the discussions around the healthcare policy of the bloc. Throughout the past months, and with the COVID-19 pandemic still fresh in our heads, the European institutions continued to shape policy priorities, with an increased focus on enhancing healthcare resilience, strengthening supply chains, and accelerating digitalisation efforts in the pharmaceutical sector. Governments and regulatory bodies across the continent intensified their efforts to streamline regulatory processes and promote the adoption of e-prescriptions to enhance patient care and accessibility.

This resulted in an additional push for the creation of a “European Health Union” and overall promotion of harmonised healthcare frameworks. In this context, the European Commission released a long-awaited proposal for a reform of the EU Pharmaceutical Legislation (Regulation 726/2004 and Directive 2001/83/EC) in May 2023. It aims to ensure increased medicine availability, accessibility, and affordability whilst promoting digitalisation and innovation in the medicinal field. While failing to propose an ambitious framework to enable patients to obtain their prescription (Rx) medicines online, the proposal offered a unique chance for EAEP members to take stock of many best practices across Europe, where the online sale of Rx is possible, and communicate externally the related significant health benefits and convenience factors.

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In this context, through the activities and expert feedback of its Pharmacy Committee, the EAEP remained at the forefront of advocating for policies that promote the safe and responsible provision of pharmaceuticals through legally operating online pharmacies. The association actively engaged with policymakers, regulatory agencies, patient organisations and other stakeholders to raise the awareness of the potential brought by digital solutions and shape legislation and guidelines that support the growth of e-pharmacies while safeguarding patient interests.

Specifically, our Pharmacy Committee held five meetings to discuss key topics on the agenda, including medicine shortages, provisions around the sale at a distance of medicinal products, electronic Product Information, and overall discriminatory treatment against e-pharmacies across Europe.

“ The growing prevalence of chronic diseases and the ageing population underscored the importance of innovative approaches to healthcare delivery. As a Committee gathering pharmacists and other experts, we emphasised the need for collaborative efforts between public and private sectors to address emerging health challenges, such as medicine shortages, and ensure sustainable healthcare systems for future generations. ”

**Dr. Friederike Geiß**  
Chair of the EAEP  
Pharmacy Committee

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# Sustainability

Since the Paris agreement, we have experienced not only a general interest in climate-related policymaking, but also a pressing interest since many of the soft policies are now increasingly becoming hard policies. The EAEP has followed up on many sustainable developments, such as the Packaging and Repackaging Waste Regulation (PPWR), but also kept a close eye on the developments in the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainable Due Diligence Directive (CSDDD), the latter which was part of negotiations between the three EU institutions throughout most of 2023. Knowing that the healthcare sector is one of the biggest polluters worldwide and knowing that also online pharmacies can contribute here, we attempt to the best extent possible to play our role by mitigating risks and also offsetting carbon emission where we can, and where achievable.

The EAEP Sustainability Committee held several meetings last year to discuss ongoing policy topics as mentioned above, but the highlight was the fact that under the group's wings, a Supplier code of conduct was set up to which all EAEP members subscribed. The code lays down the ways in which online pharmacies do business with their suppliers, and other actors in the supply chain, to prevent collaborating with those which do not uphold e.g. human and/or environmental rights.

“ For me personally, it is great to see that the work we do for Redcare Pharmacy - for instance with regard to how we take our own Supplier code of conduct to heart - can be leveraged through the EAEP member network. I am a strong believer of collaboration for a healthier world on a healthier planet. ”

**Anna Tönneßen**  
Chair of the EAEP  
Sustainability Committee

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## Partnerships and alliances:



DGIV

Potential  
For European Digital Identity



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# A word about the future

“This year’s annual report has been dedicated to the topic “enhancing the availability, accessibility, and affordability of healthcare”. This fully reflects the e-pharmacy sector’s DNA as well as the continued commitment towards ensuring that every patient in need can have access to their medication, advice, or any other type of healthcare support provided by pharmacists, everywhere and regardless of the circumstances.

In 2023, the landscape of healthcare policy continued to evolve, presenting both challenges and opportunities for online pharmacies across Europe. The EAEP has remained committed to advocating for policies that foster innovation, ensure patient safety, and promote access to quality healthcare services. We witnessed remarkable advancements and collaborations within our dynamic community as well as with our partner externally. Countless key milestones around digital health, single market – which last year turned 30, sustainability, and pharmaceuticals required the tireless attention and contribution of our experts; and will continue to do so in 2024. The steadfast commitment of our members has played a pivotal role in fostering awareness-raising of our sector and in promoting the interest of e-pharmacies and its patients in Europe. Our association has been at the forefront of promoting digital health solutions, encouraging the adoption of cutting-edge technologies to enhance patient access to healthcare as well as health outcomes, and improve the overall efficiency of the healthcare sector. In particular, last year was marked by significant progress in advocating for policies that support the safe and responsible provision of pharmaceuticals online.



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As we take stock of these accomplishments, we are reminded of the collective strength and dedication of our members. Looking at 2024, the EAEP remains committed to championing the interests of innovative, digital pharmacies, promoting innovation, and advancing patient-centric healthcare policies across Europe and beyond. A key year marked by the European elections, in 2024 we will aim at further stepping up the awareness of our sector as well as our contribution to the overall digitalisation of the healthcare system, safeguarding the interests of the millions of patients which every day rely on our members' high-quality pharmaceutical services”.

“Countless key milestones around digital health, single market – which last year turned 30, sustainability, and pharmaceuticals required the tireless attention and contribution of our experts – and will continue to do so in 2024”

**Martino Canonico**

Head of Brussels Office, EAEP



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# About the EAEP – our mission

## Members



## Structure

The Board and General Assembly constitute the governing bodies of the EAEP. In 2023, the Board and General Assembly gathered on two occasions, for in-person meetings in Brussels and Berlin. The works and activities of the Association are brought forward by dedicated working groups: Cybersecurity and Data Protection Committee, E-Health Committee, Pharmacy Committee, and Sustainability Committee. Through the exchange of views and best practices, all Committees provide the EAEP with the necessary technical input to produce ad-hoc reports, position papers, and studies aimed at advancing the e-pharmacy sector's stances. The secretariat is steered by the Head of Brussels Office, Martino Canonico.

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# Membership advantages

We represent the voice of the e-pharmacy sector on the European continent 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 digitisation.



## KNOWLEDGE-SHARING

Access to e-pharmacy-focused network



## PARTICIPATION IN COMMITTEES' WORK

Pharmacy Committee, E-Health Committee, Sustainability Committee, Cybersecurity & Data Protection Committee



## CRAFTING KEY MESSAGES

Studies, reports, newsletters, actionable material



## SHAPING EU AND NATIONAL POLICYMAKING

Meetings, events, roundtables

# Contacts

If you would like to know more about what we do, please visit our website.



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