



European Association of E-Pharmacies

# **E-PHARMACY ACTION PLAN**

**Five strategic initiatives for  
empowering Europeans in digital healthcare**

Five strategic initiatives  
for empowering  
Europeans in digital  
healthcare

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## E-Pharmacy Action Plan

### Five strategic initiatives for empowering Europeans in digital healthcare

Europe's digital healthcare transformation presents a valuable opportunity to fully integrate e-pharmacies into a modern, patient-focused system. Already, millions of patients across the continent rely on e-pharmacies for digital access to healthcare services and medicines. However, despite increasing public demand for digital health solutions, the policy landscape remains fragmented – and in some cases, overtly biased against e-pharmacies. Although the advantages of expanding digital pharmaceutical services are well-established, regulatory inconsistencies continue to limit their impact and scalability.

### Five strategic initiatives:

- ✚ **Pan-European prescription delivery** – Enable (cross-border) access to prescription medicines via registered e-pharmacies, based on e-prescriptions.
- ✚ **Access to Electronic Health Records** – Allow e-pharmacies secure access to patient data to ensure the best possible health outcome and personalised care.
- ✚ **Simplify regulations to tackle medicine shortages** – Enable e-pharmacies to offer medicines across borders to swiftly respond to shortages of specific medicines, via flexible supply chains.
- ✚ **Fair reimbursement for digital pharmacy services** – Ensure digital healthcare services are compensated equally, to promote both provision by pharmacists and uptake by patients.
- ✚ **Expand telepharmacy services** – Address healthcare workforce shortages, especially in rural areas, through remote pharmacy care.

## Introduction

The European e-pharmacy sector is at a critical juncture, with digital health innovation playing an increasingly central role in healthcare delivery. Recent legislative developments at the national and EU-level, above all the European Health Data Space (EHDS)<sup>1</sup>, offer new opportunities to healthcare providers and patients to interact and access healthcare in the digital dimension, thus breaking key barriers to convenience and availability while ensuring the best possible health outcomes for patients. The EHDS clearly recognises online pharmacies as a key actor in the EU healthcare system<sup>2</sup>, with a view to establishing a level playing field between offline and online healthcare services. This forms a key component of the European Health Union, which is far from being fully realised.

This Action Plan outlines key policy proposals with a view to contributing to the completion – and further strengthening – of the European Health Union, with a particular focus on the digitalisation of healthcare. By fostering regulatory harmonisation and digital integration, the European Association of E-Pharmacies (EAEP) aims with the following 5 key strategic initiatives to enhance availability, accessibility, and affordability of healthcare products and services in Europe, as well as patient equality. The EU policymakers' proactive engagement with these proposals will ensure a more integrated, just, non-discriminatory, and patient-centric approach to (digital) healthcare in the coming years.

The time is now to establish complementarity of digital/physical services and overcome unjustified barriers, finally unleashing the full potential of digital solutions for patients to be in control of their health.

## Two Key Pillars

The Action Plan is composed of two key pillars:

### Online pharmacies' contribution to the delivery of healthcare in Europe

This chapter provides an **overview of the state of play of the sector in Europe**, presenting key data and findings from recent reports.

### A roadmap to unlock the potential of e-pharmacies in the digital healthcare system

This chapter presents a **roadmap composed of five key policy proposals**, aimed at unleashing the full potential of digital health services such as telepharmacy and remote access to medicines, for patients to have **seamless, convenient, and equitable digital access to healthcare**, both country-wide and across borders in the EU.

## Online pharmacies' contribution to the delivery of healthcare in Europe

### Key takeaways:

- ✚ **E-pharmacies are central to the digital transformation of healthcare:** they are not just an extension of traditional pharmacies but fully licensed healthcare providers offering **regulated access to prescription and OTC medicines, remote consultations, and personalised digital health services**. They operate under strict national and EU regulations and ensure high standards of data security and pharmaceutical care, making them pivotal players in the shift to more accessible, digital-first healthcare systems.
- ✚ Digital access helps to **overcome barriers in rural areas or for patients with mobility challenges** – by ensuring access to medicines and advice directly to homes, closing supply gaps. E-pharmacies also **enhance medication adherence through digital tools** like refill reminders and home delivery, addressing a key issue behind **avoidable healthcare costs**. This digital approach could save European healthcare systems billions annually.
- ✚ **Growth depends on regulatory harmonisation and digital readiness.** In 2024, the European e-pharmacy market has reached a total estimated value of €10 billion across its top ten countries<sup>3</sup>, and is set to keep growing across Europe, particularly in digitally prepared countries with supportive regulations. However, uneven regulatory frameworks remain a barrier. To fully unlock the sector's potential, **harmonised EU-wide rules and non-discriminatory frameworks for all pharmacies, including online pharmacies, are necessary**. Countries that embrace innovation and patient-centric policies are leading in adoption and reaping the benefits.

The digital transformation of healthcare has ushered in new avenues for patients to access medicines and healthcare services. **E-pharmacies, as fully-fledged registered pharmacies, are at the forefront of this transformation, acting at the crossroads of healthcare, digitalisation, and sustainability.**

E-pharmacies have emerged as a significant evolution in the delivery of healthcare, offering patients a convenient, safe, and regulated way to access both prescription (Rx) where allowed and over-

the-counter (OTC) medicines, coupled with ad-hoc, personalised advice through remote consultations. In this sense, digital pharmacies are fully licensed and operate under stringent national and EU-level pharmaceutical legislation, engaging qualified, licensed pharmacists and pharmaceutical experts to ensure the best health outcome. Crucially, they rely on secure digital systems to protect sensitive patient data, maintaining high standards of privacy and security.



The digital transformation sweeping across the healthcare sector has further pushed the rise of e-pharmacies. Reflecting this trend, the European e-pharmacy market experienced strong double-digit growth in recent years<sup>4</sup>. This growth is part of a broader movement toward digital healthcare solutions, which now encompasses much more than just the delivery of medication. Indeed, e-pharmacies are increasingly expanding their offerings to include digital health services such as telepharmacy, virtual consultations, and tailored health advice – providing patients with a more holistic and integrated healthcare experience.

Several key trends are shaping this evolving landscape. At the basis of this there are key digital tools such as e-prescriptions and **electronic health records**, which significantly **streamline and accelerate the online dispensing process** and related interaction checks conducted by pharmacists, ultimately **facilitating healthcare delivery**. In parallel, patient behaviours are changing: today's patients are not only seeking and favouring the convenience offered by accessible digital tools, but also valuing the digital security and reliability offered by online services.


Evidence from the **Copenhagen Economics report**  (2024) highlights this shift in patient attitudes. In countries such as Sweden, where full online access to medicines at registered e-pharmacies is permitted by law, more than half (56%) of patients interviewed make active use of these solutions. In parallel, in countries such as France, Italy, or Spain, where access to prescription medicines online (coupled

with related online pharmaceutical support) is not currently permitted, nearly a third (31%) of respondents indicated they would likely use such services if available.

The ability to order medication and obtain pharmacists' advice digitally at any time of the day, as well as benefit from additional digital services such as reminders to refill medications, remote monitoring, etc., combined with the elimination of the need to physically visit a pharmacy, translates into **meaningful time savings and convenience to get healthcare support directly from home**. This is particularly important for individuals managing chronic conditions or those with limited mobility, as well as for patients living in rural or remote areas.


Moreover, online access is helping to address common barriers to medication adherence. Issues such as forgetfulness, lack of stock at local pharmacies, or simply time constraints can all hinder patients from following their prescribed treatments. With 200,000 premature deaths a year across Europe due to lack of medication adherence, urgent actions are needed to reverse this trend. Encouragingly, **57% of respondents who have used online pharmacy services report that it helps them adhere better to their medication regimens**. In addition, the same study highlights that expanding online access to prescription medicines across the EU could yield substantial economic benefits for healthcare systems. The convenience of online access to Rx is projected to **save between €1.3 billion and €2.3 billion annually in patient time and travel costs** as the market matures.

Furthermore, improved medication adherence – facilitated by timely home delivery and automated refill services – could help reduce the estimated €125 billion in avoidable healthcare costs linked to non-adherence each year. These efficiencies not only alleviate pressure on healthcare providers but also enhance patient outcomes, particularly for those with chronic conditions or limited mobility<sup>5</sup>.

Studies show that expanding online access to Rx medicines not only reduces inefficiencies in healthcare systems but can also significantly enhance patient choice, particularly in underserved regions. The [IEGUS report](#)  (2025) offers compelling evidence from Germany, where e-pharmacies have played a vital role in securing medicine supply in rural areas. Contrary to concerns about the decline of traditional pharmacies, the report finds that closures are driven by broader structural issues – such as workforce shortages, economic pressures, and fewer practicing physicians – rather than competition from online pharmacies.

In fact, **online pharmacies are increasingly seen as part of the solution to ensuring a comprehensive, sustainable, and cost-effective medicine supply.** In Germany alone, EAEP members delivered 95 million packages of medicine in 2023, with rural and suburban areas particularly benefitting from this growing digital infrastructure. Regions with fewer physical pharmacies saw a noticeable increase in online deliveries, demonstrating the value of digital access in bridging gaps in traditional healthcare services<sup>6</sup>.

This trend is not a short-term response to the COVID-19 pandemic but part of a **broader, long-term shift toward digital healthcare.** As more people become comfortable with digital platforms and e-commerce, the barriers to accessing medicines online at registered e-pharmacies continue to diminish. Furthermore, the demographic shift toward older, more digitally savvy populations – who also have greater healthcare needs – will likely accelerate this development.

The growing role of online pharmacies is further testified by IQVIA's report on [The Rise of E-Commerce in the Health and Wellbeing Market](#)  (2025), which points out that e-pharmacies are transforming the health and wellbeing market, with a strong emphasis on digital health. It highlights the rapid growth of online pharmacies offering health products and services, driven by advancements in Artificial Intelligence (AI), telehealth, and personalised recommendations. While AI is increasingly powering these digital solutions – enhancing convenience, affordability, and tailored health experiences – it is essential that such technologies are always validated and overseen by pharmacists and pharmaceutical experts to ensure safety, accuracy, and trust. The future of the sector points toward deeper integration of digital health technologies, making healthcare more accessible and personalised<sup>7</sup>.

In short, e-pharmacies are not just a convenience – they represent a pivotal shift in how healthcare can be accessed and delivered. By combining digital innovation with trusted pharmaceutical practices, they have the potential to play an increasingly

central role in modern healthcare ecosystems across Europe, contributing to tackling key issues affecting the swift function of and access to healthcare systems.

Taken together, the abovementioned **data presents a compelling case for regulatory reform**. The evidence clearly shows that online pharmacies are instrumental actors for meeting the evolving healthcare needs of the population. Several steps can be

taken to support the growth of online pharmacies and address supply chain challenges with digital health solutions. Such steps, addressed more in-depth in the next chapter, involve harmonising regulations across Member States, encouraging innovation in and access to digital solutions in healthcare, enhance supply chain resilience by establishing a more simplified and unified framework that would allow online pharmacies to operate seamlessly across the EU.

## E-pharmacy market trends

In 2024, the European e-pharmacy market reached a total estimated value of €10 billion across its top ten countries<sup>8</sup>. This figure highlights not only the significant role that online pharmaceutical services now play in European healthcare, but also the pace at which digital adoption is transforming this sector. The average growth rate of the online e-pharmacy market across these countries stands at roughly 10%, reflecting a steady upward trend in patient behaviour toward digital health solutions.

While some of the largest European markets, such as Germany, continue to lead in absolute market size, the most dynamic growth is increasingly observed in smaller and mid-sized countries. These emerging markets are benefiting from a combination of favourable regulatory reforms, increasing digital literacy, and growing citizen demand for accessible healthcare solutions. Central and Northern European countries have shown particularly strong momentum, narrowing the digital health gap through targeted policy changes and investment in digital infrastructure.

Strong digital infrastructure and high levels of patient trust have proven to be key enablers of market expansion. In several countries, robust growth in e-pharmacy adoption is reflecting a broader societal shift toward digital-first healthcare access. Western and Southern European markets have also demonstrated significant progress, suggesting that the penetration of e-pharmacy services is becoming a stable and structural feature of national health systems across Europe.

Despite widespread growth, the pace of development remains uneven, and the pace could be much faster. As such, harmonisation and digital-friendly rules remain key levers for unlocking the full potential of the European e-pharmacy sector<sup>9</sup>.

## A roadmap to unlock the potential of e-pharmacies in the digital healthcare system

### Key takeaways:

- ✚ **Harmonised EU-wide regulation is essential** to unlock the full potential of e-pharmacies and digital healthcare. This includes enabling pan-European prescription delivery, standardising reimbursement, and granting digital access to critical healthcare infrastructure. Regulatory fragmentation, outdated national policies, and the lack of dedicated EU legislative initiatives in this domain are limiting the potential of patient's access to healthcare through e-pharmacies.
- ✚ **Digital tools like the European Health Data Space and Digital Identity Wallet** must be accessible to e-pharmacies to ensure a channel-neutral healthcare system that benefits all patients regardless of how services are delivered.
- ✚ **E-pharmacies can help solve critical systemic issues**, including medicine shortages and healthcare workforce gaps, through scalable solutions like telepharmacy and cross-border medicine redistribution. Any further delays in taking such actions risk widening inequalities in healthcare access and innovation.

### Five strategic initiatives:

1. **Pan-European prescription delivery** 📄 – Enable (cross-border) access to prescription medicines via registered e-pharmacies, based on e-prescriptions.
2. **Access to Electronic Health Records** 📄 – Allow e-pharmacies secure access to patient data to ensure the best possible health outcome and personalised care.
3. **Simplify regulations to tackle medicine shortages** 📄 – Enable e-pharmacies to offer medicines across borders to swiftly respond to shortages of specific medicines, via flexible supply chains.
4. **Fair reimbursement for digital pharmacy services** 📄 – Ensure digital healthcare services are compensated equally, to promote both provision by pharmacists and uptake by patients.
5. **Expand telepharmacy services** 📄 – Address healthcare workforce shortages, especially in rural areas, through remote pharmacy care.



## Five strategic initiatives for empowering Europeans in Digital Healthcare

The digital transformation of healthcare in Europe offers a unique opportunity to integrate e-pharmacies into a modern, patient-centric system. Millions of patients across Europe already benefit from digital access to healthcare services and medicines through e-pharmacies. Despite clear and growing public demand for digital health services, the **policy environment across Europe remains fragmented and, in some cases, actively discriminatory towards e-pharmacies**. While the benefits of expanding digital pharmaceutical services are well-documented, regulatory inconsistencies continue to hinder their full potential.

Outdated policies, both at the EU and national level, continue to limit the potential of digital pharmacy services, consequently preventing patients from benefitting from convenient remote access to healthcare. As we move towards a more integrated healthcare system, where patients increasingly access health services and products across borders, a **harmonised approach to e-pharmacy regulations** is essential to ensure equitable access to digital healthcare solutions while maintaining patient safety and trust. This lack of harmonisation limits not only the reach of e-pharmacies but also broader EU objectives related to digital integration and equitable healthcare access.

Implementing these five strategic initiatives is essential to modernising Europe's healthcare landscape, eventually moving from a European Health Union to the establishment of a fully-fledged **European Digital Health Union: (1) enabling pan-European Prescription delivery, (2) ensuring e-pharmacies have access to Electronic Patient Files, (3) addressing medicine shortages through regulatory simplification; (4) overcoming reimbursement barriers; and (5) expanding telepharmacy services**. Together, these pillars foster innovation, enhance patient care, and create a more resilient and equitable healthcare system across Europe.

This is a pivotal moment to act on these five pillars, as digital healthcare is advancing swiftly and regulatory frameworks need to evolve accordingly to support equitable access and greater efficiency. The rollout of the **European Health Data Space (EHDS)** presents a unique chance to embed e-pharmacies within the broader healthcare ecosystem. At the same time, growing medicine shortages, healthcare workforce gaps, and increasing patient demand for digital services underscore the pressing need for regulatory alignment. With the expansion of e-prescriptions, telepharmacy, and digital identity tools, inaction risks deepening inequalities in access and innovation – making this the right time for decisive change.



## 1. Pan-European Prescription (Rx) delivery

Digital pharmacy services should not be restricted by national borders, particularly when the EU emphasises the free movement of goods and services. Yet, in 19 Member States, restrictions on the online access to prescription medicines through registered e-pharmacies still exist, limiting patient choice and access. This leaves 8 Member States, including Sweden, Netherlands, Germany, Lithuania, Denmark, Estonia, Finland, and Portugal, allowing their patients this choice. Currently, such significant **disparities in national regulations** create barriers to equitable access to medicines through digital channels. This lack of uniformity **fragments the internal market** and creates confusion and discrimination for both pharmacies and patients.

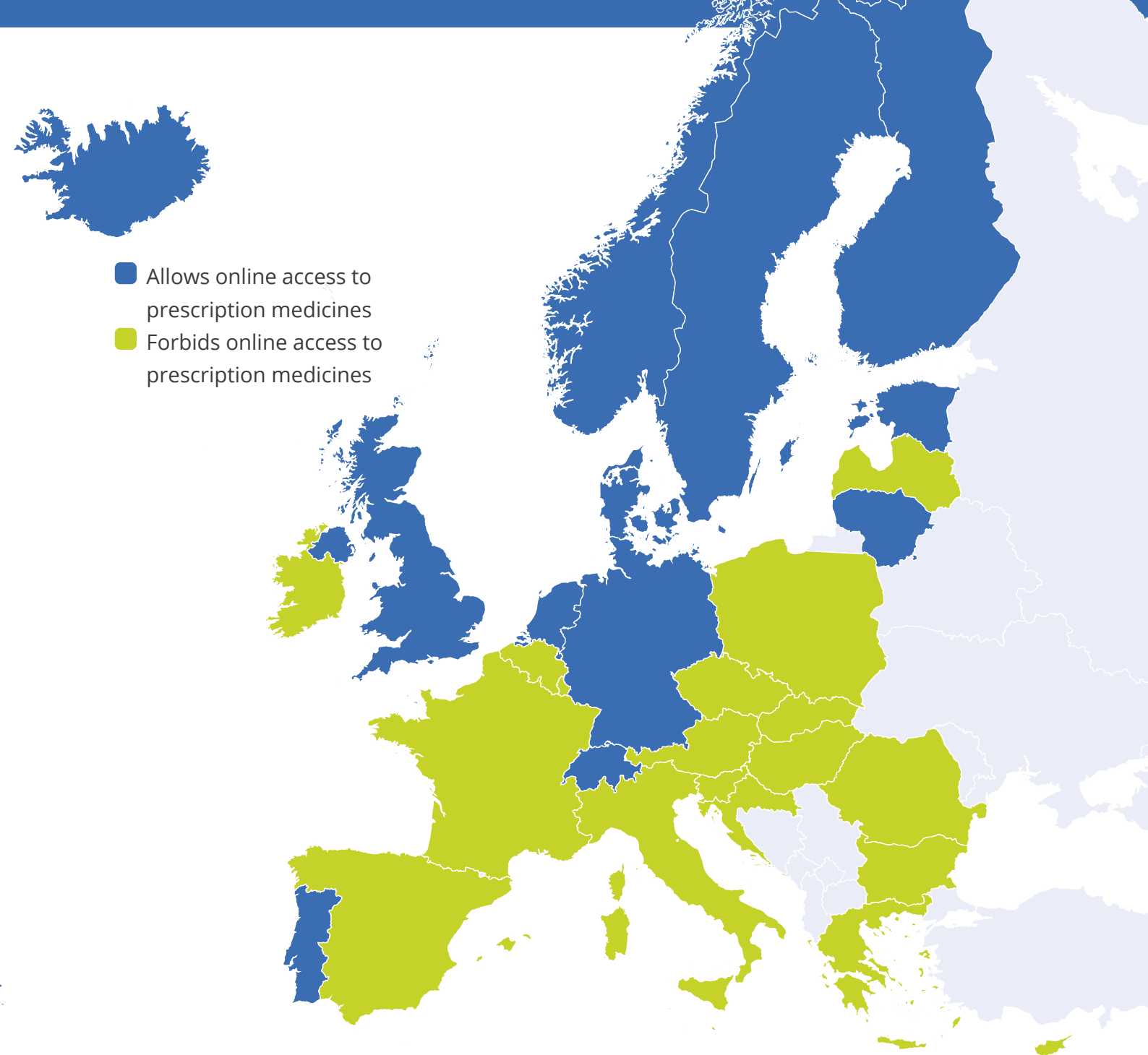
Policymakers should recognise that online order and home delivery of prescription medications by registered online pharmacies enhances patient adherence, particularly for those with chronic conditions, mobility challenges, or those living in rural areas<sup>10</sup>.

A harmonised EU-wide approach would ensure that e-pharmacies can offer medicines, including Rx, across borders and in line with the MyHealth@EU infrastructure for the cross-border sharing of e-prescriptions, providing patients with the freedom to choose where and how they access their healthcare services and especially ensuring better continuity of care.

To achieve this, policymakers must recognise the instrumental role played by online pharmacies in ensuring seamless cross-border healthcare services.

### Recommendations:

- ✚ The swift implementation of the European Health Data Space (EHDS) should explicitly grant **online pharmacies access to e-prescriptions, including across borders, to avoid further discriminatory treatment**, as spelled out in Article 23.6 “MyHealth@EU” of the Regulation.
- ✚ To ensure equitable access to healthcare and unlock the full potential of digital health services, the EU should pursue **regulatory harmonisation enabling the online sale and cross-border dispensing of prescription medicines across all Member States**. Currently, disparities in national legislation create fragmentation, hinder patient access, and limit the scalability of trusted e-pharmacy services. We recommend that the European Commission, in collaboration with Member States, initiates a legislative proposal or guideline to mandate the **legalisation of online sales of prescription medicines across all EU countries by registered pharmacies**, under strict existing safeguards and ensuring patient safety and professional oversight<sup>11</sup>.

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- Legend:
- Allows online access to prescription medicines
  - Forbids online access to prescription medicines
- The map shows that countries like Iceland, Norway, Sweden, Finland, Denmark, Germany, France, Ireland, and the UK allow online access (blue), while others like Spain, Italy, Greece, and Poland forbid it (yellow). Many Eastern European countries are greyed out.

## 2. Electronic Health Records and EU Digital identity Wallet: ensuring access for e-pharmacies



To promote patient choice and support the development of seamless digital healthcare, EU digital health infrastructure – such as the MyHealth@EU enabling the use of cross-border **Electronic Health Records (EHRs)**, and the **EU Digital Identity Wallet (EUDIW)** – must be **channel-neutral, ensuring equal access for both physical and online pharmacies**. In some cases, access is still linked to e.g. physical health cards being presented physically in the pharmacy, which prevents online pharmacies from accessing these tools. Even where digitalisation has occurred (e.g., Germany's full digital solution to redeem e-prescription called Cardlink), **reliance on physical components** creates friction for digital service delivery and **undermines uptake and interoperability across borders**.

In contrast, the EU should implement **fully digital, internet-based systems** that are interoperable across borders. These models deliver a paperless, patient-centric experience, enhancing efficiency, supporting leaner operations, and improving accessibility across rural and urban areas. Moreover, such systems can be scaled to support AI-driven triaging, cross-border e-prescription redemption, and integration into the European Health Data Space (EHDS).

To realise a truly pan-European, digitally-enabled healthcare ecosystem, the EU must **avoid a patchwork of national implementations and instead champion a unique, fully digital option** that supports both interoperability and equal treatment of all healthcare providers, including e-pharmacies. This requires embedding non-discrimination and cross-border compatibility into the design of EHRs and the EUDIW.

#### Recommendations:

- ✚ Guarantee **equal technical access and integration rights for e-pharmacies into national digital health systems** (e.g. Electronic Health Records, EU Digital Identity Wallet), removing unjustified barriers based on the mode of service delivery.
- ✚ **Leverage the EUDIW to enable patients to securely store their e-prescriptions and redeem them at e-pharmacies, including across borders.**
- ✚ **Promote a fully digital, EU-wide interoperable model** over hybrid or card-dependent systems, to ensure alignment with EHDS objectives, improve cost-efficiency, support AI-driven innovation, and prevent fragmented national infrastructures that impede patient access in the digital health space.

### 3. Addressing medicine shortages through regulatory simplification



Medicine shortages remain a pressing issue in the EU, disproportionately affecting rural areas and smaller Member States with limited pharmaceutical supply chains. E-pharmacies can play a crucial role in mitigating these shortages by: **(1)** providing greater visibility on and availability of medicines; and **(2)** enabling better redistribution of medicines between regions. However, regulatory barriers often prevent online pharmacies from offering medicines cross-border where they are needed most. To address this, the EU should implement flexible supply chain frameworks that allow for the rapid redistribution of medicines in shortage: a more **streamlined regulatory environment would empower e-pharmacies to play a proactive role in balancing supply and demand across Member States.**

## Recommendations:

- ✚ **Establish an EU-wide reallocation flexibility framework** that allows authorised e-pharmacies to redistribute medicines experiencing shortages across Member States, particularly in underserved regions;
- ✚ Formally **recognise e-pharmacies as stakeholders** in any EU initiatives addressing medicine availability, ensuring they can contribute real-time data and practical solutions;
- ✚ Promote **simplified regulations on imports and compounding regulations**, to facilitate cross-border access to key medicines (e.g. patient information leaflets available in multiple languages).

## 4. Overcoming barriers to reimbursement of digital health services



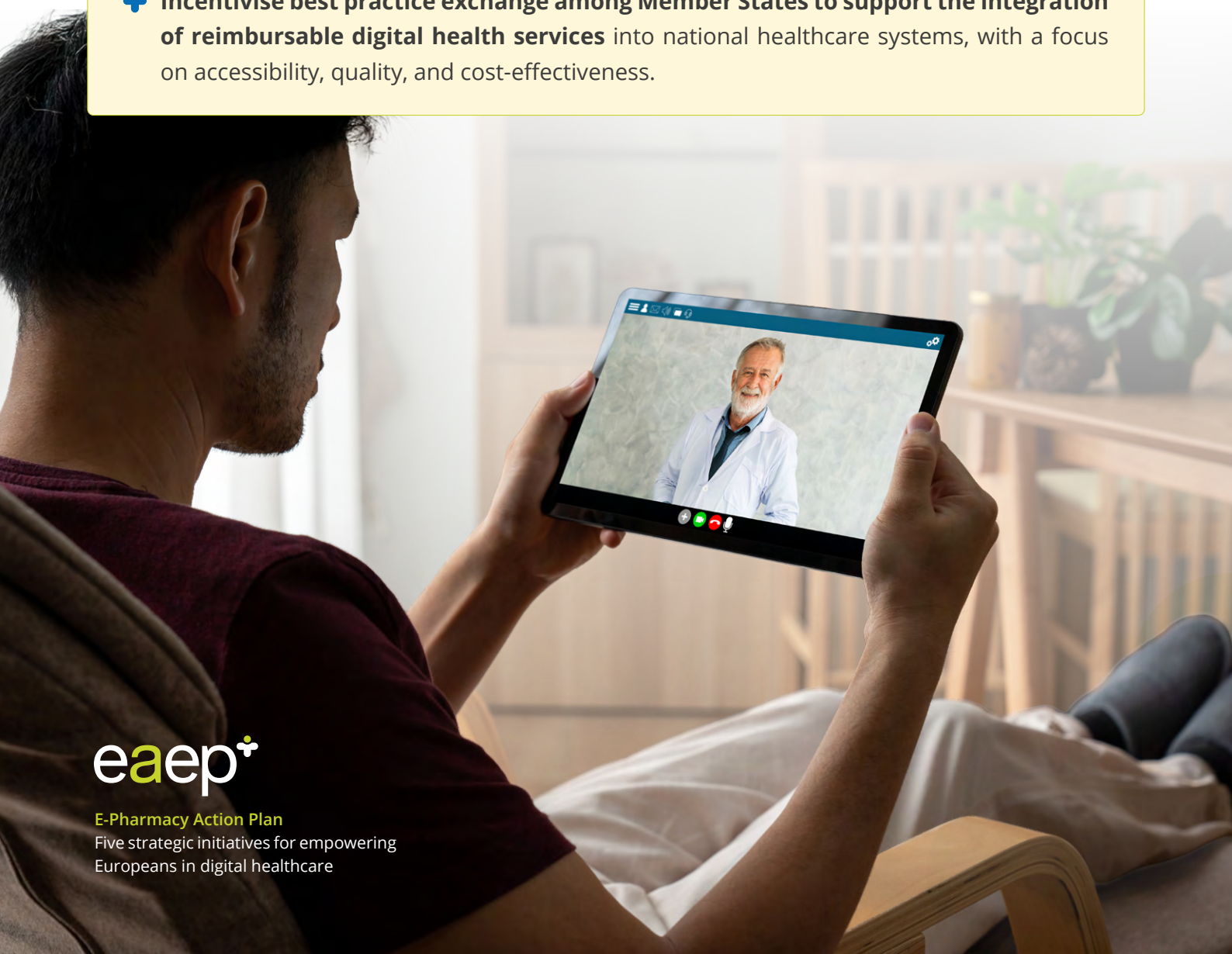
Despite the clear advantages of digital healthcare, reimbursement policies in many Member States continue to prioritise traditional, in-person healthcare models over e-pharmacies and other digital solutions. This creates a financial disincentive for healthcare providers to invest in digital infrastructure, ultimately missing out on the potential offered by digitalisation of healthcare for patients. Policymakers must address these disparities by creating **standardised reimbursement models that ensure digital healthcare services receive fair compensation**.

In many European countries, pharmaceutical services offered by online pharmacies are reimbursed differently, or not at all, compared to physical pharmacies: telepharmacy is usually not or only to a certain extent reimbursed for e.g. medication analysis, or only reimbursed to brick-and-mortar pharmacies. Promoting **equitable reimbursement practices** will not only encourage investment in digital healthcare but also improve accessibility for patients who rely on remote healthcare services. Aligning these reimbursement policies with broader EU healthcare funding initiatives will be crucial in accelerating the adoption of digital pharmacy services across Europe. Hence, future legislation should acknowledge and promote a **level playing field for healthcare stakeholders when it comes to (cross-border) reimbursement policies**. This strategic approach directly addresses challenges in healthcare delivery and access (especially across borders), while also serving as a catalyst for innovation.



## Recommendations:

- ✚ **Encourage the adoption at the Member State level**, through an EU initiative, of **standardised and channel-neutral reimbursement models that ensure digital pharmacy services** – such as telepharmacy, remote medication reviews, and digital consultations – are **reimbursed on an equal footing** with in-person services. This can be achieved by promoting the inclusion of digital pharmaceutical services within national health insurance schemes and align reimbursement policies with EU-level healthcare funding initiatives, such as [EU4Health](#), [Digital Europe Programme](#); [Connecting Europe Facility](#), and [Horizon Europe](#).
- ✚ **Establish methodological and regulatory frameworks for rapid approval of reimbursement of new digital health services.** Such procedures should be harmonised across the EU. In absence of these frameworks, innovation will be hampered by a slow approval process and disadvantaged vis-à-vis in-person healthcare models, ultimately risking that digital health, including e-pharmacies, will not be used to its full potential.
- ✚ **Incentivise best practice exchange among Member States to support the integration of reimbursable digital health services** into national healthcare systems, with a focus on accessibility, quality, and cost-effectiveness.





## 5. Telepharmacy: digital solutions in aid of healthcare professional shortages

The growing **shortage of healthcare professionals**, particularly in rural and underserved areas, makes it increasingly difficult for patients to **access timely advice and healthcare support**. Online pharmacies and telepharmacy solutions can help mitigate the shortage of qualified pharmacists – one of the key factors behind the absence of brick-and-mortar pharmacies in certain areas – by centralising expertise and optimising the use of limited human resources through digital infrastructure. Telepharmacy services, defined as “a service that includes location-independent communication between authorised pharmacy staff and patients as well as interprofessional consultations with other healthcare professionals within the scope of pharmaceutical activities. Communication takes place by means of electronic media, in particular telephone or video, synchronously or asynchronously”<sup>12</sup>, offer a practical and cost-efficient solution by allowing pharmacists to provide remote consultations, medication reviews, and digital prescription services. This contributes to **reducing the need for on-site support of healthcare professionals**, at least for a big part of the services provided by the pharmacy: an increased role of e-pharmacies would not only improve patient care but also **alleviate pressure on overstretched healthcare systems**. However, many national healthcare systems still fail to fully recognise the value of telepharmacy, limiting its integration into mainstream healthcare delivery, as well as reimbursement.

To ensure **telepharmacy becomes an integral part of the EU healthcare strategy**, policymakers must establish clear legal frameworks that support its widespread implementation.

### Recommendations:

- ✚ **Establish a clear legal definition and recognition of telepharmacy** at EU level, with an ad-hoc legislative initiative, enabling its integration into mainstream healthcare delivery across Member States.
- ✚ **Promote interoperability and cross-border access** to telepharmacy services within the framework of the European Health Data Space and the EU Digital Identity Wallet.
- ✚ **Ensure telepharmacy services are eligible for public reimbursement**, including remote medication reviews, counselling, and interprofessional consultations, to promote uptake and sustainability.
- ✚ **Strengthen public trust in digital pharmacy services** by enhancing awareness of the **EU Common Logo** for certified e-pharmacies and increasing enforcement against illegal operators.

## Conclusion

Europe stands at a critical inflection point in the evolution of its healthcare systems. As this Action Plan outlines, e-pharmacies are no longer a futuristic concept but a present-day solution that can address some of the most pressing challenges facing patients, healthcare professionals and providers, and policymakers alike. **From medicine shortages and healthcare professional gaps to rural access and patient adherence, e-pharmacies offer practical, scalable tools that improve care quality and accessibility, including across borders.**

Yet, despite proven benefits and rising patient demand, **outdated and fragmented regulations continue to obstruct the full realisation of digital healthcare's potential.** Without decisive and harmonised action at the EU level, inequalities in access, care delivery, and innovation risk deepening further.

The five strategic initiatives proposed in this Action Plan – enabling cross-border prescription delivery, ensuring equal access to digital health infrastructure, simplifying

rules to address medicine shortages, standardising reimbursement of digital services, and expanding telepharmacy – provide a **clear roadmap to empower patients and modernise healthcare delivery.**

This is a unique window of opportunity. The implementation of the European Health Data Space, the momentum around the Digital Identity Wallet, and ongoing reforms across Member States create a fertile policy landscape. By embedding e-pharmacies within these broader frameworks, the EU can ensure that digital health becomes more than a buzzword – it becomes a reality for all Europeans.

Now is the time for the European Commission, Member States, European Parliament, and health stakeholders to act. By **embracing a patient-centric, digitally enabled, and inclusive approach to healthcare,** Europe can move from a European Health Union to a truly **European Digital Health Union** — one that leaves no one behind.



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11. Article 114 TFEU, supported by Article 168(4)(c) TFEU, would provide a solid legal foundation for a legislative initiative harmonising the online sale of prescription medicines across the EU, ensuring both the smooth functioning of the internal market and high standards of safety. Article 114 has already been used for harmonising rules on medicinal products, including Directive 2001/83/EC (the Community code on medicinal products) and the Falsified Medicines Directive (Directive 2011/62/EU), which introduced the EU Common Logo for legally operating online pharmacies.
12. The Pharmacy of the Future, EAEP, 2024 [https://www.eaep.com/uploads/eaep-paper-pharmacy-of-the-future-1.pdf?\\_cchid=055bb8c1338070918fd9b2a1b46d0e2a](https://www.eaep.com/uploads/eaep-paper-pharmacy-of-the-future-1.pdf?_cchid=055bb8c1338070918fd9b2a1b46d0e2a)