

EAEP feedback to the European Commission's Call for Evidence on the review of the Digital Decade Policy Programme

The European Association of E-Pharmacies (EAEP) welcomes the opportunity to contribute to the European Commission's review of the Digital Decade Policy Programme (DDPP). At the midpoint of the Digital Decade, **we recognise the significant progress made across digital infrastructures, public services, and health digitalisation**. However, the 2025 State of the Digital Decade Report underscores that **progress remains uneven**, particularly in foundational digital skills, AI integration, data infrastructure interoperability, cybersecurity readiness, and regulatory coherence.

This rapid expansion of digital solutions is reshaping how Europeans access healthcare services, helping address longstanding challenges related to accessibility, continuity of care, patient mobility, and system efficiency. As Europe moves toward a more integrated digital health ecosystem, services that rely on digital infrastructures, secure data exchange, and cross-border interoperability are becoming essential parts of modern healthcare delivery. E-pharmacies, as fully licensed pharmacies operating through digital channels, are uniquely **positioned at the intersection of healthcare delivery and digital transformation**. A growing number of European patients already rely on online pharmacy services for convenient and safe access to medicines and health support. Ensuring that the **Digital Decade Programme fully integrates and supports digital pharmacy services is essential** to building a channel-neutral European healthcare system.

The EAEP strongly supports the Programme's four pillars: digital skills, secure digital infrastructures, digital transformation of businesses, and digitalisation of public services. We are particularly glad to see the **strong momentum in digital public services and health digitalisation**, including the expanded availability of electronic health records, progress towards the implementation of the European Health Data Space, increased investment in the accessibility of eHealth services, and the widespread rollout of the EU Digital Identity Wallet. We also note the positive political prioritisation of cybersecurity, infrastructure resilience, and the growing integration of AI in healthcare and innovation.

Nonetheless, **several structural challenges continue to hinder the full achievement of the DDPP's objectives**. Fragmented approaches to regulation across Member States remains the main barrier to the uptake of foundational digital technologies and limiting interoperability and data portability. The skills gap, both in basic digital literacy and in specialised competencies such as AI and cybersecurity, continues to be a significant obstacle.

To address these challenges, the EAEP proposes to:

- 1. Ensure a channel-neutral and fully digital infrastructure for citizens to access healthcare**

To achieve the objectives on universal access to electronic health records and secure cross-border electronic identification (Article 4 of the DDPP), both the EHR and the EUID Wallet infrastructures must be accessible to all licensed healthcare providers,

including those that operate online, to prevent the exclusion from the framework of patients that wish to access e-health services. Furthermore, the measurement of access to health records in Article 2(15) of the DDPP should be updated to explicitly reflect the scope and functionalities introduced by the European Health Data Space, as well as e-prescriptions and e-dispensing services. Ensuring e-pharmacies' integration into digital health systems is essential for secure authentication, seamless data exchange, improved cross-border services, and the removal of discriminatory barriers between physical and digital domains. Today, fragmented national regulations still exclude online pharmacies in several Member States, creating misalignment with the DDPP's digitalisation goals. A harmonised, channel-neutral approach is necessary to ensure patient safety and equitable access across the Single Market.

- **Proposed revision of Article 2(15):** Access to e-health records, measured as:
 - (i) the nationwide availability of online access services for citizens to their electronic health records data (via a patient portal, or a patient mobile app) with additional measures in place that enable certain categories of people (e.g. guardians for children, people with disabilities, elderly) to also access their data, and (ii) the percentage of individuals that have the ability to obtain or make use of their own minimum set of health-related data, **including e-prescriptions and e-dispensing data**, currently stored in public and private electronic health-record (EHR) systems, **in accordance with European Health Data Space interoperability and access standards.**

2. Promote responsible and human centric use of AI in healthcare

Artificial Intelligence can significantly improve clinical accuracy, reduce administrative burdens, support medication engagement, identify drug interactions and enhance patient outcomes. However, Figure 3 of the State of the Digital Decade 2025 report shows that AI take-up by businesses in the EU is at just 18%, far below the 2030 target of 75%. This gap reflects how limited adoption still is, despite AI's proven potential. To unlock the full benefits for patients and pharmacists, a supportive regulatory framework is needed. In the healthcare sector, this approach should combine clear rules enabling deployment with mandatory human oversight, strong data governance rules that ensure privacy, transparency and safety, development in digital skills, and investments in the responsible uptake of AI solutions across the healthcare ecosystem.

3. Advance digitalisation of health systems and patient access

The DDPP should accelerate the update of core digital-health tools across the Union. This includes ensuring full national deployment of interoperable electronic health systems and guaranteeing seamless cross-border data exchange through the harmonised implementation of the EHDS. Priority should also be given to expanding e-prescriptions, enabling their cross-border use, and fostering access to telehealth services such as telepharmacy – which improve continuity of care. Strengthening the language of the new DDPP and including specific objectives around telehealth will be essential to scale these tools sustainably and ensure equal access to patients across all Member States.

4. Strengthen digital skills for healthcare providers

Pharmacists must be equipped to deliver new digital services. This entails dedicated financial support for upskilling in AI, digital literacy and data governance, alongside formal recognition of the evolving role of pharmacists in providing consultation, telepharmacy services and personalised digital care.

5. Increase cybersecurity across digital health solutions

As healthcare becomes increasingly digital, strong cybersecurity mechanism are vital to protect sensitive patient data and maintain safe, reliable access to pharmaceutical services. Online pharmacies, which handle confidential information and operate across the supply chain, are a key factor in this landscape. Future measures must cover the entire digital pathway, from prescription to delivery, while allowing pharmacists to use health data responsibly to support better outcomes. Due to human errors still accounting for a major source of breaches, alongside traditional hacker attacks, healthcare workers need continuous, updated training and clear response protocols. Given the financial burden of cybersecurity tools and capacity building, particularly for SMEs, dedicated EU and national funding would help providers uphold high security standards across the digital healthcare system.

Given the pace of technological and healthcare transformations, the EAEP **supports updating the Digital Decade Policy Programme targets and implementation strategy** to reinforce digital health objectives, introduce dedicated targets for interoperable health data, adjust digital-skills benchmarks, and establish measurable milestones for safe AI deployment in health services.

The revision of the Digital Decade is a **crucial opportunity to modernise healthcare, strengthen competitiveness, and improve patient access to safe, convenient and innovative services**. E-pharmacies play a key role in this transformation, but their full potential can only be unlocked through regulatory harmonisation, interoperability, responsible AI adoption, and strong digital skills development. The EAEP is ready to collaborate with the Commission to ensure that the **revised Digital Decade Policy Programme reflects technological developments, strengthens Europe's digital resilience, and delivers a truly patient-centred and inclusive digital health ecosystem**.

About EAEP:

The [European Association of E-Pharmacies](#) (EAEP) represents the voice of e-pharmacies on the European continent. The EAEP promotes its interests mainly with political stakeholders, regional and business actors, with the ultimate aim to improve the health of Europe's citizens and strengthen the European healthcare system. E-pharmacies have digitalised the classical pharmacy, and therefore act at the crossroads of digitalisation, healthcare, e-commerce and sustainability. As pioneers in digital healthcare, EAEP members innovate secure processes for managing health data, delivering medications, and providing digital healthcare services.

Compliant with both national and EU regulations, all members are committed to advancing the quality, safety and efficiency of healthcare for all Europeans.

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