

EAEP feedback to the Public Consultation on the Packaging and Packaging Waste Regulation proposal

The **European Association of E-Pharmacies** (EAEP), as the organisation representing the voice of the e-pharmacy sector on the European continent, welcomes the opportunity to provide feedback on the initiative “**Packaging and Packaging Waste Regulation**” (PPWR) proposal. We look forward to continuing to engage in this and other policy initiatives stemming from the Green Deal.

EAEP members recognise that all stakeholders across the value chain need to take steps to enable the fundamental transformation of our economy, society, and industry. Based on their leading role in innovation and technology, **online pharmacies play an important part in ensuring patient access to medications and healthcare services while also improving the overall sustainability of the healthcare product and supply chain**. In that sense, we strive to be ambitious in reducing our ecological footprint while at the same time serving our patients with the quality and care they expect from us.

As we constantly seek ways to reduce the sector’s ecological footprint across the value chain, we are of the opinion that the new rules governing packaging and packaging waste, and any future legislation, should overall ensure **harmonised definitions and standards across the EU** – a level playing field, while considering the specifics required for packaging pharmaceutical/medicinal products in each EU Member State.

To this end, the EAEP wishes to underline three key pillars, calling on the EU Institutions to:

- ✚ **Avoid a one-size-fits-all approach** when it comes to provisions for e-commerce operators due to reasons of (public) health protection.
 - E-pharmacies, as healthcare providers, deal with the delivery of amongst others medicinal products – categories which require **measures to ensure that the packaging does not jeopardise the safety of the shipped products**. Since patient safety is of utmost importance, the final text of the legislation should not impose packaging limitation if they directly affect the health and wellbeing of European citizens.
 - Although the packaging used should be as sustainable as possible, the EAEP notes that it is unclear how to handle potential complaints (e-commerce players would be required to e.g. document the empty space ratio of every single parcel). This would lead to excessive administrative burden which should be by all means avoided.

- The proposed 40% ratio should not apply to re-usable packaging (Art. 21), as otherwise e-commerce players would have to make use of many different sizes of re-use packaging in stock, which will hardly be actionable.
- It should be clarified that the so-called performance criteria justify an exemption of the 40% empty space ratio (e.g. when the product itself or the handling of a product require certain protection or minimum sizes of the packaging due to health protection reasons).
 - For example, this is the case for certain medicinal products that need coolers, to be placed within the individual packaging in the transport phase, at certain weather conditions, for the safety requirements of the medicine to be upheld. The volume of these coolers together with void space would in many cases exceed the 40 % empty space ratio. We therefore suggest that elements necessary to ensure product safety are exempted from the 40 % empty space ratio.
 - Another example are products with small measurements, as it is often the case for drugs and other medicinal products. Shipping service providers have minimum requirements for the size of a parcel in order to be processed, furthermore it also needs to be ensured that the required information (e.g. shipping label) can be provided on the parcel. It should therefore be made clear in the regulation that handling and product safety requirements justify an exemption of the 40% empty space ratio.
- ✚ **Thoroughly assess the consequences of mandatory standards for the reusability** of packaging (B2C) for e-commerce players in the healthcare domain.
 - The proposal should include a requirement at systemic level to push for the reusability of packaging: offers should be made to carriers in such a way that a sustainable system is set up, e.g. by using a deposit system like is the case in many countries with plastic bottles and increasingly aluminium cans.
 - Therefore, the 50 % quota of reusable packaging within a system for re-use until 2040, proposed in the PPWR proposal, should only be implemented if a system for re-use would actually reduce carbon footprint, as also the return of the re-use packaging has to be taken into account. Furthermore, the customer's active involvement in such re-use system is an instrumental factor.
- ✚ **Put forward standards applicable to all operators** (e.g. suppliers, carriers) across the whole supply/value chain, in order to make its implementation possible and consistent.

To know more about the activities of the EAEP in the sustainability domain, please check at our latest [position paper](#).

ABOUT US

The [European Association of E-Pharmacies](#) (EAEP) represents the interests of e-pharmacies on the European continent. The EAEP voices 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 providing digital solutions and our innovative and secure processes in dealing with health data, offering medicinal products and digital healthcare service while complying with national and EU law, the EAEP members continuously seek for ways to enhance the quality, safety and efficiency of healthcare for Europeans

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