# EAEP POSITION PAPER ON MEDICINE SHORTAGES



### ADDRESSING MEDICINE SHORTAGES IN EUROPE

## **±** Escalating medicine shortages – understanding the roots

The European Association of E-Pharmacies (EAEP) recognises the critical issue of medicine shortages across Europe and its profound impact on patients and the overall healthcare system. The issue of medicine shortages, as a growing phenomenon in Europe, is affecting both common and life-saving medications. Many factors contribute to its rise, from manufacturing and supply chain issues to market dynamics. As a result, the healthcare system is put under strain by delaying treatments, increasing the risk of complications, and placing additional burdens on healthcare providers. On top of this, the healthcare sector faces financial and human resource constraints, further complicating the scenario.

Online pharmacies play a crucial role in ensuring uninterrupted patients' access to essential medications, even during shortages. The patients' ability to source medications from a broad range of online pharmacies operating on their territory, as a result of the greater availability of the inventory, often helps bridge the gap between supply and demand. At the same time, as all other actors along the medicine supply chain, the e-pharmacy sector is negatively affected by ongoing medicine shortages across Europe, which in many cases jeopardise their patients' access and medication adherence.

The results of an internal EAEP survey among members, conducted in October 2023, confirmed the negative impact and pointed out three noteworthy elements:

- While medicine shortages increased since the COVID19 pandemic struck, the issue was already there beforehand (at the individual product line level). It is becoming more and more a pharmacy issue.
- Some countries in Europe only experience problems with Prescription (Rx) medicines, not Over-the-Counter (OTC) medicines.
- While some similarities exist when it comes to shortages of medicines for brick-and-mortar
  and online pharmacies, it is often the case that manufacturers prioritise one channel over
  the other (brick-and-mortar pharmacy / online pharmacy), resulting in uneven access
  for patients.

The EAEP firmly believes that addressing the lack of both common and life-saving medications requires a collaborative effort between policymakers, authorities, pharmaceutical companies, healthcare professionals and providers, and patients, to safeguard citizens' well-being and ensure the integrity of the European healthcare system. Below we provide a comprehensive overview of our recommendations, based on the input from our experts in the EAEP Pharmacy Committee.





## **÷** Ensuring the continued availability of medicines – our recommendations

The June 2023 European Council conclusions<sup>1</sup> and the European Commission Communication on Addressing Medicine Shortages in the EU<sup>2</sup> constitute a sound basis for further action to ensure the continued availability of medicines and aim to put forward short-term and long-term measures to establish a secure medicines supply meeting patients' needs.

The EAEP is of the opinion that any legislative or non-legislative initiative in this domain should have the underlying goal to address the vulnerabilities currently affecting the supply chain. Therefore, we call on the EU institutions to:

- Ensure the swift adoption of the revised EU Pharmaceutical Legislation, putting forward measures to encourage the availability, accessibility, and affordability of medicines to guarantee that "Europeans receive the medicines they need, when they need them, regardless of where they live in the EU", as mentioned in the European Commission Communication on Addressing Medicine Shortages. Breaking existing barriers to the digital access to medicines will contribute to ensuring the availability of medicines, even across borders, and especially to preventing the rise of new shortages in the future.
- Require pharmaceutical manufacturers to flag any shortages in a timely way, as this is
  key to detect early an unexpected shortage and act upon it. A list of all manufacturers in
  possession of a specific medicine should be developed. More transparency on ongoing trends
  in the market is needed: going forward, it is of utmost importance to ensure stronger
  collaboration between manufacturers, wholesalers, pharmacies and physicians to share
  information and develop contingency plans.
- Promote **simplified regulations on imports and compounding regulations**, to facilitate cross-border sale of key medicines (e.g. leaflets in different languages).
- Ensure the **interoperability of e-prescription systems across Member States**, through the upcoming mandatory MyHealth@EU infrastructure<sup>3</sup>, to facilitate cross-border access to medicines.
- Lastly, while pharmaceutical companies and wholesalers should implement additional
  measures to ensure a continued supply of medicines, the EAEP is of the opinion that any
  requirement to have safety stocks conflicts with a sustainable approach towards
  medicines. In this sense, when a surplus of the medications stocked arises, this usually leads
  to wasting unused medicines<sup>4</sup>.

<sup>&</sup>lt;sup>1</sup> https://data.consilium.europa.eu/doc/document/ST-7-2023-INIT/en/pdf

<sup>&</sup>lt;sup>2</sup> https://commission.europa.eu/system/files/2023-10/Communication\_medicines\_shortages\_EN\_0.pdf

<sup>&</sup>lt;sup>3</sup> https://health.ec.europa.eu/ehealth-digital-health-and-care/electronic-cross-border-health-services en

<sup>&</sup>lt;sup>4</sup> Medicines that are nearing their expiry date/shelf life, according to the GDP guidelines, should be withdrawn immediately from saleable stock either physically or through equivalent electronic segregation.



In addition to existing and planned policy, legislative and regulatory measures, the EU needs a strategic and coordinated industrial approach to enhance security of supply of the most critical medicines.

The continued availability, accessibility, and affordability of medicines for patients is a key foundation of the European Health Union. The EAEP is committed to playing an active role in achieving this goal and is eager to engage in constructive dialogue with all relevant stakeholders.

#### **ABOUT US**

The <u>European Association of E-Pharmacies</u> (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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