

“If the healthcare sector were a country, it would be the fifth-largest greenhouse gas emitter on the planet”<sup>1</sup>, due to energy consumption, transportation, and product manufacturing, use and elimination. As the European Association of E-Pharmacies (EAEP), we believe that we have an important role to play and even can set an example as healthcare providers to reduce emissions in the healthcare sector. The members of the EAEP share the European Union’s (EU) goal of achieving **net-zero carbon emissions by 2050** as well as other environmental targets laid down in the European Green Deal. We are aware of the urgency of achieving these objectives in order to reach the Paris Agreement’s goal to limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels. We are aware of the negative correlation between global warming and human health and therefore commit to supporting the European Institutions in the implementation of the EU’s environmental and climate agenda. Paradoxically, the healthcare sector has an enormous impact on saving lives but at the same time the carbon footprint of the health industry in general, and pharma in particular, led to partly excluding and not even perceiving the healthcare sector as one of the biggest polluters and contributors to CO<sub>2</sub> emissions. As acknowledged by the World Health Organization (WHO), in developed countries health facilities have been estimated to contribute between 3-8% of national greenhouse gas emissions. In this context, procurement of goods and consumables is considered to be “one of the most important sources of greenhouse gas emissions from the health sector”.<sup>2</sup>

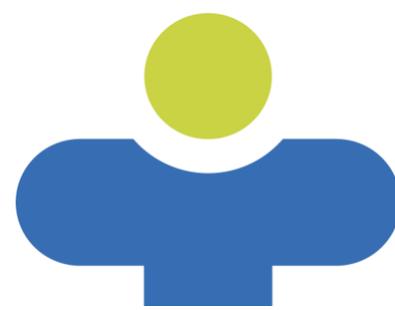
However, this can change: the EAEP sees a huge potential for creating positive societal impact by digitalising the healthcare sector – whether through digital innovations or data-driven efficiency gains. In this sense, e-pharmacies can play a vital role in providing better access to healthcare provisions and a sustainable, fair and more efficient healthcare system.

We recognise that all stakeholders across the value chain need to take steps to enable the fundamental transformation of our economy, society, and industry. In order to ensure a European leadership position in the economic, digital and environmental spheres, this transition needs to be both fair and sustainable. We believe that a holistic approach that addresses the three dimensions of sustainability – namely environmental, economic, and social policies – is more important than ever to fully decarbonise the healthcare sector, the product and supply chain.

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<sup>1</sup> A statement made by Healthcare without Harm, a non-profit network of European hospitals, medical service providers, local authorities, academic institutions and environmental organizations.

<sup>2</sup> <https://www.who.int/teams/environment-climate-change-and-health/air-quality-and-health/sectoral-interventions/health-care-activities/health-risks>



## Our vision for a sustainable Pharmacy Sector in Europe

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.

### ✦ We believe our industry can be a key ally in **building a sustainable economy**

- **We work towards environmental-friendliness:** by operating online, the home delivery option will ultimately be likely to generate less CO<sub>2</sub> than traditional shopping trips. We are working on developing even more effective circular economy solutions and intensively trying to reduce, reuse and recycle packaging material and resource usage. Leveraging the logistical skills and technology essential to our business, we are greatly experienced in supplying healthcare products in the most efficient and sustainable manner possible.
- **We care about social inclusion:** online delivery of medicines enables better, faster, and cheaper access to crucial treatments. Through our refined logistical processes, we are a key partner in making medications available in rural areas as well as for other patient groups who struggle to reach traditional bricks-and-mortar pharmacies due to e.g. health or mobility issues. The Covid-19 crisis has further highlighted the instrumental role e-pharmacies play in supplying EU citizens so they can achieve optimal health outcomes.
- **We care about Europe's innovation leadership:** sustainable cross-border and online delivery can help European healthcare to remain a global leader in a world where globalisation and freedom of movement are crucial for the provision of healthcare products and services.

### ✦ We favour a **sustainable transformation of the healthcare sector**

In working towards the implementation of the objectives laid down in the European Green Deal alongside the comprehensive achievement of the United Nations Agenda 2030 and the 17 Sustainable Development Goals, the EAEP and its members seek to engage with all stakeholders to raise the awareness of the efforts needed to boost the sustainable transformation of the healthcare sector. To enable online pharmacies to fully contribute to the achievement of social and environmental goals, policymakers should take actions in the following domains:

- **Digitisation of the health sector:** our industry is a pioneer in and key enabler for translating the concept of e-health into practical and real benefits for patients and healthcare systems.
- **Removal of barriers in the internal market:** for online pharmacies to deliver optimised services to EU patients and customers, it is vital that there are no unjustified national restrictions on the delivery of treatment.
- **Investment into digital infrastructure:** online pharmacies

can create transformative change to healthcare by enabling widespread equitable access to medication and services. To achieve this change at scale there needs to be long-term investment into digital infrastructure and access across the EU.

#### ✦ We support the EU policymakers' commitment to **creating a sustainable future**

EAEP members are a valuable partner and supporter of the EU's policy-making process, by operating at the crossroad of digitalisation, healthcare, and sustainability. Through the EAEP Sustainability Committee, members continuously gather and exchange data and relevant expertise on how to implement actions and strategies to achieve common green targets, working towards constructive input to the ongoing discussions at the EU and national level. As we constantly seek ways to reduce the sector's ecological footprint across the value chain, we are of the opinion that existing and future legislation should overall ensure **harmonised definitions and standards across the EU – a level playing field**, while considering special pharmacy laws in each EU Member State. More specifically, EAEP members feel the urgency to address mainly two legislative initiatives falling under this policy domain: the **Corporate Sustainability Due Diligence Directive (CS3D)** and the review of the **Packaging and Packaging Waste Directive (PPWD)**. Below we provide our concrete views.

#### **Corporate Sustainability Due Diligence Directive:**

- We do support the aim of the CS3D:
  - Improve the EU regulatory framework on company law and corporate governance;
  - Enable companies to focus on long-term sustainable value creation rather than short-term benefits;
  - Better align the interests of companies, their shareholders, managers, and society;
  - Help companies to better manage sustainability-related matters in their own operations and value chains as regards social and human rights, climate change, environment, etc.;
  - Foster harmonisation of national laws.
- In particular, considering the commitment to the Paris agreement / EU Green Deal, it is of utmost importance that large companies have a harmonised obligation to contribute to climate change mitigation. That is why we favour the following aspects planned to be integrated in the Directive enabling a level playing field at the same time:
  - Adopt a plan to ensure that business model and strategy are compatible with a transition to a sustainable economy, and limiting global warming to 1.5 °C (in line with the Paris Agreement);
  - Identify the extent to which climate change is a risk for, or an impact of, a company's operations;
  - Emission reduction objectives should be included in a company's plans. The fulfilment of these obligations would have to be taken into account in the calculation of a director's variable remuneration, where remuneration is linked to his or her contribution to the company's business strategy, and long-term interests and sustainability.

### **Review of the Packaging and Packaging Waste Directive:**

- When it comes to the provisions for e-commerce operators, a one-size-fits-all approach should be avoided. E-pharmacies, as healthcare players, deal with the delivery of drugs and health products – a category which requires ad-hoc measures to ensure that the packaging does not jeopardise the safety of the shipped products.
- In order to make its implementation possible and consistent, the legislation should put forward standards applicable to all operators (e.g. suppliers, carriers) across the whole supply/value chain.
- A proper assessment of the consequences of mandatory standards for the reusability of packaging (B2C) for e-commerce players in the healthcare domain (which do not have many returns) should be carried out, in order to avoid worsening carbon emissions and decreasing convenience for customers (e.g. in case the packaging need to return to the logistic centres). It can only improve environmental performance if it is a systemic approach; empty returns only increase the need for additional last mile infrastructure capacities.
- There should be a leveraging of the existing physical healthcare infrastructure to allow e-commerce customers to access physical healthcare sites in their local communities to recycling and/or repurpose packaging. This would encourage circular healthcare practices and foster a mutually beneficial relationship between e-commerce actors and physical healthcare providers.

As the EU is in the process of setting new rules for e-commerce businesses in the sustainability domain, the EAEP aims to ensure that the views and challenges of online pharmacies are heard by EU and national policymakers and reflected in the final legislation.

We are ready to advance our vision for a sustainable pharmacy sector and are committed to engage in a constructive dialogue with all stakeholders.

### **About the EAEP**

The [European Association of E-Pharmacies](#) (EAEP) represents the interests of e-pharmacies on the European continent. More than 20 million customers and patients across Europe are currently being supplied by our members and on top of that, our online pharmacies and their more than 4,000 employees are currently active in eleven European markets. 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. EAEP members continuously seek for ways to enhance the quality, safety and efficiency of healthcare for Europeans.

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