



European Association of E-Pharmacies

TOWARDS AN EU FRAMEWORK FOR TELEPHARMACY: EQUAL ACCESS TO DIGITAL PHARMACEUTICAL CARE FOR EVERY PATIENT

Position Paper

Recommendations:

- ⊕ **Modernise the rules for cross-border healthcare to integrate telepharmacy into the EU legislative framework.**
- ⊕ **Ensure equal reimbursement of (cross-border) telepharmacy services.**
- ⊕ **Enable cross-border online access to prescription medicines through strengthened EU digital health frameworks.**
- ⊕ **Update the Mutual Recognition of Professional Qualifications rules to support digital pharmacy roles.**

Telepharmacy, defined as the **provision of pharmaceutical care through digital technologies**, is changing the way Europeans access healthcare services. As patients increasingly turn to their online pharmacy not only to obtain medicines, but to seek timely, professional advice on their treatment, side effects, and adherence, telepharmacy enables pharmacists to deliver remote consultations, digital medication reviews, prescription verification, and adherence support via secure online platforms, verified by the EU Common Logo. It responds directly to a growing patient expectation for on-demand, accessible pharmaceutical expertise, while maintaining the same high standards of safety, quality, and professional oversight that apply in a physical pharmacy.

The daily practice of telepharmacy has many faces and offers a wide range of options for how the service is implemented. At its core, **telepharmacy reflects patients' increasing demand for direct interaction with a pharmacist at the moment they need advice**, regardless of time or location. The diversity of telepharmacy includes among others **telephone consultations**, which enable patients to receive pharmaceutical advice regardless of their location. In addition to synchronous care (via video), asynchronous methods and tools, such as contact by email and chat, enable flexible pharmaceutical therapy tailored to the individual patient. It should be emphasised that holistic medication management is carried out in daily pharmaceutical practice; this also includes the holistic consideration of all health issues. Naturally, the entire internal patient history is taken into account.

Apart from the possibility of consultation before ordering medicines, telepharmacy does **not end after the order has been placed**, but **goes beyond** that. If, for example, a placed order reveals any issues requiring clarification directly from a pharmacist, such as drug-related problems (interactions, etc.) or other pharmaceutical questions relating to the prescription delivery, patients are proactively called before the package is dispatched to discuss and clarify these issues in a personal conversation.

Proactive calls are also made as part of a therapy support programme in which patients can enrol. It goes without saying that telepharmacy consultations are carried out exclusively by **qualified pharmaceutical personnel** (pharmacists or pharmaceutical technical assistants). Furthermore, documentation and quality assurance are, of course, also part of telepharmacy. Documentation requirements are met by means of complete documentation of all patient consultations in the internal pharmacy management system. The time, the person providing the consultation, the topic and the content of the conversation are documented for quality assurance and, if necessary, for review and traceability in accordance with applicable data protection guidelines.

Yet, full **access to telepharmacy services remains highly fragmented across Member States**, leading to **unequal access to healthcare services for European citizens**. While some countries, such as Sweden, Germany, and the Netherlands, have successfully integrated telepharmacy and online prescription delivery into their national health systems, others still impose restrictive or outdated legal regimes. This regulatory asymmetry creates a patchwork of national frameworks that not only limit patients' ability to access digital health services in their country, but also across borders, ultimately undermining one of the key principles of the EU: the free movement in the Single Market. Without a unified European approach to telepharmacy, patients in different Member States face extremely different levels of access to safe and reliable digital pharmacy services, perpetuating inequalities rather than addressing them.

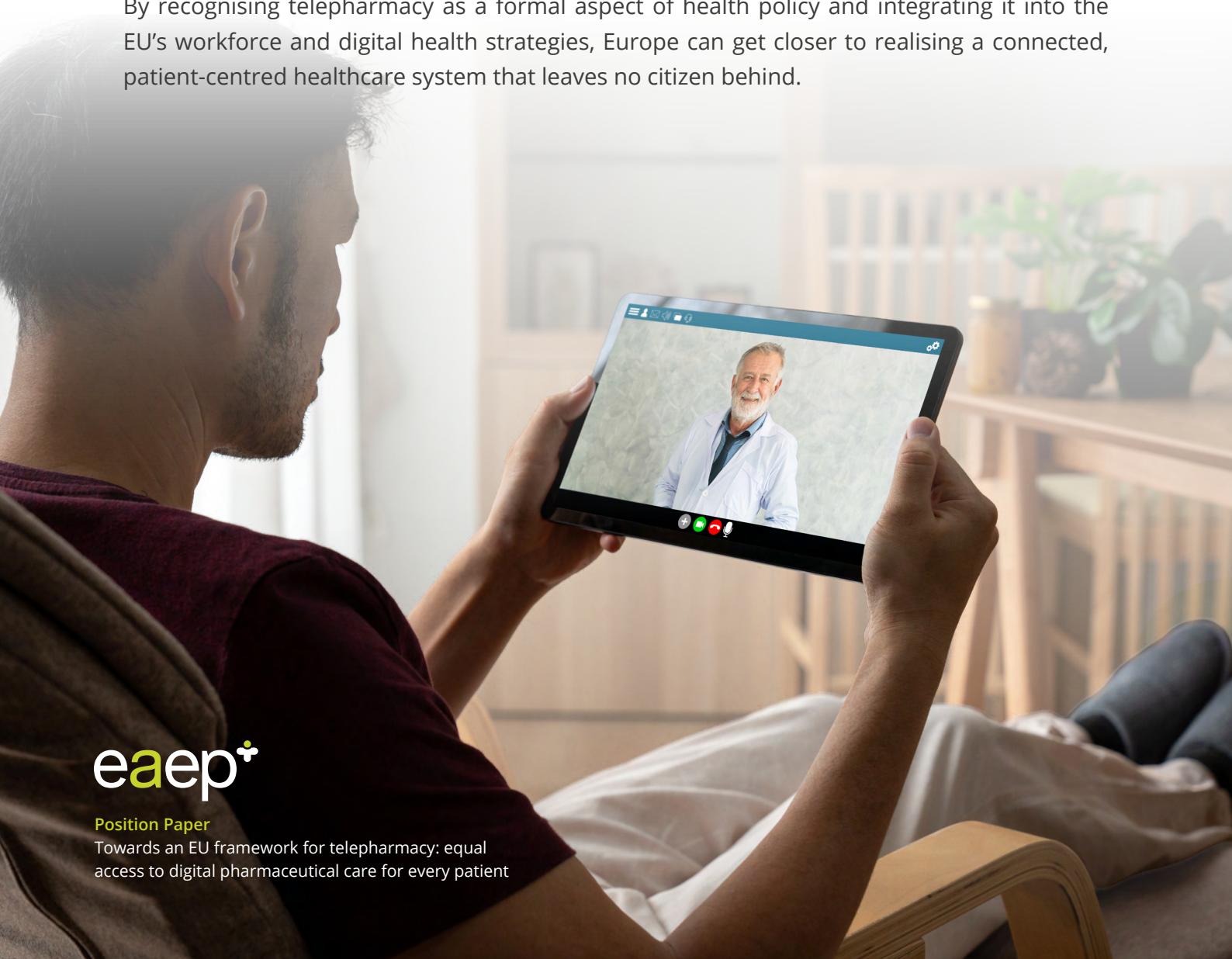
In the context of Europe's evolving health landscape, **telepharmacy has emerged as a strategic response to systemic challenges**. Patients are increasingly seeking pharmaceutical advice outside traditional opening hours and physical locations, while the EU faces an intense health workforce crisis, with staff shortages projected to reach over four million professionals by 2030, and major disparities between urban and rural access to care. By decentralising access to pharmaceutical expertise, **telepharmacy services extend the reach of pharmacists** without requiring physical relocation, **alleviate pressure on overburdened national health systems**, and **enhance continuity of care** for elderly patients, those managing chronic diseases, with reduced mobility, and their caregivers. Additionally, digital pharmacy services improve medication adherence, which is one of Europe's most costly public health problems, estimated at up to €125 billion annually in avoidable expenses, through refill reminders, remote monitoring, and patient education. Effectively, digital pharmacy apps can help patients monitor their health and medication use at home, allowing action to be taken before a situation becomes acute and hospitalisation is required.

Importantly, **telepharmacy services do not replace traditional brick-and-mortar pharmacy's services, they complement them**. By extending the reach of pharmacists beyond physical locations, telepharmacy acts as a connection between underserved communities and healthcare professionals, particularly in rural and suburban areas where staff shortages and unequal distribution of healthcare professionals are increasingly common.

This complementary strengthens the entire system by reducing pressure on local pharmacies and primary care providers, and empowers pharmacists to provide the necessary support to their patients from flexible locations beyond the pharmacy premises, utilising innovative digital tools to ensure quality.

Beyond its operational benefits, telepharmacy services are key to **achieving the EU's broader health objectives**. It directly supports the goals of the **European Health Data Space (EHDS)** and the **European Health Union** by promoting **equitable access to healthcare across Member States, digital integration, and patient empowerment**. Through the use of interoperable digital tools, such as e-prescriptions, electronic health records, and the EU Digital Identity Wallet, telepharmacy strengthens cross-border collaboration, advances data-driven health management, and ensures that healthcare remains inclusive, efficient, and resilient.

In this sense, **telepharmacy is a key pillar of Europe's future healthcare ecosystem**. It is a growing industry that exemplifies how digitalisation can expand access, reinforce patient safety, and keep the EU's commitment to universal, high-quality cross-border healthcare. By recognising telepharmacy as a formal aspect of health policy and integrating it into the EU's workforce and digital health strategies, Europe can get closer to realising a connected, patient-centred healthcare system that leaves no citizen behind.



Recommendations:

With the aim of ensuring the **safe, effective, and equitable integration of telepharmacy across the EU**, the EAEP proposes the following actions:

⊕ **Modernise the rules for cross-border healthcare to integrate telepharmacy into EU Health Policy**

To fully enable patients to benefit from telepharmacy services across Member States, the European Commission should **include telepharmacy within the scope of the Cross-Border Healthcare Directive**. While the current Directive recognises telemedicine and defines its rules for cross-border provisions, it fails to address telepharmacy, resulting in legal uncertainty and unequal access to digital pharmaceutical care across Member States. This revision ought to **clarify the rights of patients to access pharmaceutical care remotely** – ensuring continuity of treatment when moving between EU Member States, and create a coherent framework for data protection, patient safety, and professional responsibility. Therefore, we call on the EU to adopt a **standardised definition of telepharmacy** that reflects its multifaceted nature, encompassing remote dispensing, medication counselling, and pharmaceutical monitoring through digital technologies. The definition should align with existing EU legislation on digital health, e-prescriptions, and patient data protection.

Suggested definition of telepharmacy: 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 telephony or video, synchronously or asynchronously.

In this way, EU-level recognition of telepharmacy would **facilitate integration into national health systems**, promote cooperation between regulatory bodies, and encourage best practices that uphold the same standards of quality, ethics, and safety as traditional pharmacy practice. It would also **strengthen patient trust by increasing enforcement against illegal operators** and enhancing the awareness of the EU Common Logo for certified e-pharmacies. In doing so, the EU would **empower pharmacists to contribute fully to the digital transformation of healthcare**, while ensuring patients' safety, trust, and equitable access to pharmaceutical care across all Member States.

⊕ Ensure equal reimbursement of (cross-border) telepharmacy services

To ensure equity of access and long-term sustainability, Member States should establish **reimbursement mechanisms, including in cross-border cases, for telepharmacy services**. The EU should encourage Member States to put forward standardised, channel-neutral reimbursement models ensuring that telepharmacy services, such as remote medication reviews, counselling, and interprofessional consultations, are reimbursed on **equal terms with in-person care**. Adequate support would allow healthcare providers to invest in secure digital infrastructure, patient communication tools, and staff training. Cross-border reimbursement schemes should reflect the added value of telepharmacy in improving adherence, supporting chronic disease management, and expanding access in rural or underserved areas. Recognising telepharmacy as a reimbursable service will be **key to its widespread adoption and public acceptance**.

⊕ Enable cross-border online access to prescription medicines through strengthened EU digital health frameworks

To unlock the full potential of digital health and improve continuity of care for all EU patients, Member States should **build on existing infrastructure**, such as e-prescriptions, MyHealth@EU, and the broader European Health Data Space (EHDS), to enable the **secure cross-border dispensing of prescription-only medicines via pharmacies**. The EU should encourage Member States **to harmonise rules on access to prescription medicines online**, based on the EU infrastructure for the cross-border sharing of e-prescriptions and coupled with professional oversight, through interoperable standards for authentication, data sharing, and pharmacovigilance to ensure patient safety and privacy. Enabling these capabilities within the MyHealth@EU and EHDS frameworks will promote trust, traceability, and a more resilient European health system.

⊕ Update the Mutual Recognition of Professional Qualifications rules to support digital pharmacy roles

As pharmacists' responsibilities evolve - from medication experts to digital health navigators - **the Mutual Recognition of Professional Qualifications Directive needs a comprehensive update to accommodate remote and hybrid practice models**. The Directive was designed to facilitate mobility when professionals physically relocate to establish themselves in another Member State; it is therefore ill-suited to situations where services cross borders while the professional remains in place. **Modern legal frameworks should explicitly allow home-office and hybrid arrangements, giving pharmacy employees more flexibility and making pharmacies more attractive employers**. With the right rules in place, brick-and-mortar and online services can complement one another and jointly underpin a resilient pharmaceutical supply system. Yet current legislation does not adequately reflect emerging roles in telepharmacy and remote patient care. **A future-proof model for the profession should formally recognise hybrid and remote pharmacist functions, enabling continuity of care** - for example by supporting and monitoring patients at home rather than ending the care journey at the pharmacy counter.

Conclusion

Telepharmacy has the power to make healthcare in Europe more accessible, efficient, and fair. However, fragmented national regulations still prevent many citizens from benefiting equally from digital pharmaceutical care. A harmonised cross-border EU framework is crucial to guarantee that all Europeans, regardless of where they live, can access safe, high-quality telepharmacy services.

By clearly integrating telepharmacy into EU health policy, through recognition, official definition, reimbursement systems, and integration into the EU legal framework, the EU can improve patient trust, support healthcare professionals, and uphold the Single Market principles. **Embracing this digital solution is not only about modernising healthcare but also about ensuring equality, continuity of care, and resilience across the EU.**

References

1. OECD (2023) "Health at a Glance: Europe"; WHO Europe "Health workforce policy briefs"
2. International Longevity Centre UK (2022) "Doctor's orders: Why adherence is critical to improving health outcomes across the life course"
3. IEGUS (2025) "The role of online pharmacies in the supply of pharmaceuticals in Germany: A quantitative and qualitative analysis"
4. The applicable data protection regulations must be complied with. Consultations can also be carried out by appropriately authorised pharmacy staff by means of telepharmacy via a state-of-the-art end-to-end encrypted, synchronous real-time video connection without switching advertisements.

About the 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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