

PGEU feedback on the Roadmap on the evaluation of patients rights in cross-border healthcare

The Pharmaceutical Group of the European Union (PGEU), the organisation representing community pharmacists in 32 European countries, welcomes the European Commission's initiative of assessing the performance of the Cross-border Healthcare (CBHC) Directive. Community pharmacists observe that today, significant barriers remain in place which prevent patients to take full advantage of the CBHC directive. For community pharmacists this is especially noticeable in the area of recognition of prescriptions across borders.

The 2012 study on Health Reports for Mutual Recognition of Medical Prescriptions¹ estimated that at the time 2.33 million foreign prescriptions were presented for dispensing across the EU annually. The analysis also suggested that 55% of these prescriptions were not dispensed immediately due to key challenges such as the verification of the prescriber and the authenticity of the prescription, language barriers, missing information and availability of (substitute) drugs. A 2019 internal survey among PGEU members confirmed that community pharmacists are still regularly faced with these challenges despite the issuing of rules and/or guidance for the recognition of foreign prescriptions at European² and national level in several countries.

In some Member States, EU rules on recognition of prescriptions have not yet been duly implemented into national legislation. In others, regardless of the implementation thereof, in some occasions health professionals, such as community pharmacists, are facing difficulties to ascertain the authenticity and validity of prescriptions issued by a prescriber established in a Member State different from the one where the medicine is being dispensed to the patient. For instance, community pharmacists are confronted to prescriptions written in a language they do not understand and are often unable to contact the prescriber. In some instances, it is also unclear to the pharmacist who can prescribe in another Member State. Another observation is that many patients might not be aware about their rights under the CBHC Directive and the need to inform prescribers about their intention to present any prescriptions for medicines or medical devices to a pharmacist in another country, allowing the prescribing healthcare provider to issue the prescription in line with the guidelines for cross-border use. This can complicate the effective identification of the prescribed product by the pharmacist, especially when a branded medicine has been prescribed, however, in most occasions, pharmacists are able to resolve this, for instance, by using medicines databases. Nevertheless, where the pharmacist is not in a position to ascertain the content or authenticity of the prescription, he/she may refer the patient to a local doctor.

Moreover, strong differences can still be observed in the roll-out of ePrescription systems across Europe. This may result in patients being used to present prescriptions in a digital format to pharmacies in their country of affiliation (e.g. via a smartphone) whilst the pharmacy in the country of visit might not be able to verify its authenticity. This can make ePrescription easily forgeable without a reliable cross-border communication system. PGEU therefore strongly supports the ongoing initiatives to allow

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https://ec.europa.eu/health/sites/health/files/cross_border_care/docs/matrix_mutual_recognition_prescriptions_en.pdf

² <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012L0052&from=EN>



interoperability of systems facilitating the cross-border provision of electronic healthcare services, including the exchange of ePrescriptions, as a mean for safer and more effective cross-border healthcare provision overall in the EU. Today, ePrescriptions of citizens from Croatia, Estonia, Finland and Portugal can already be retrieved in pharmacies in some other EU countries, which has the potential to strongly improve the recognition process of prescriptions across borders for the specific purposes outlined in the CBHC Directive.

PGEU, together with its member organisations, will be glad to further support the European Commission in its efforts to improving the performance of the CBHC Directive and enabling patients across Europe to take full advantage of its potential.