



Aligning Patient Demand, Digital Infrastructure and Regulation

A Pan-European Analysis of Online Access to
Prescription Medicines in the European Union

White Paper Consultation

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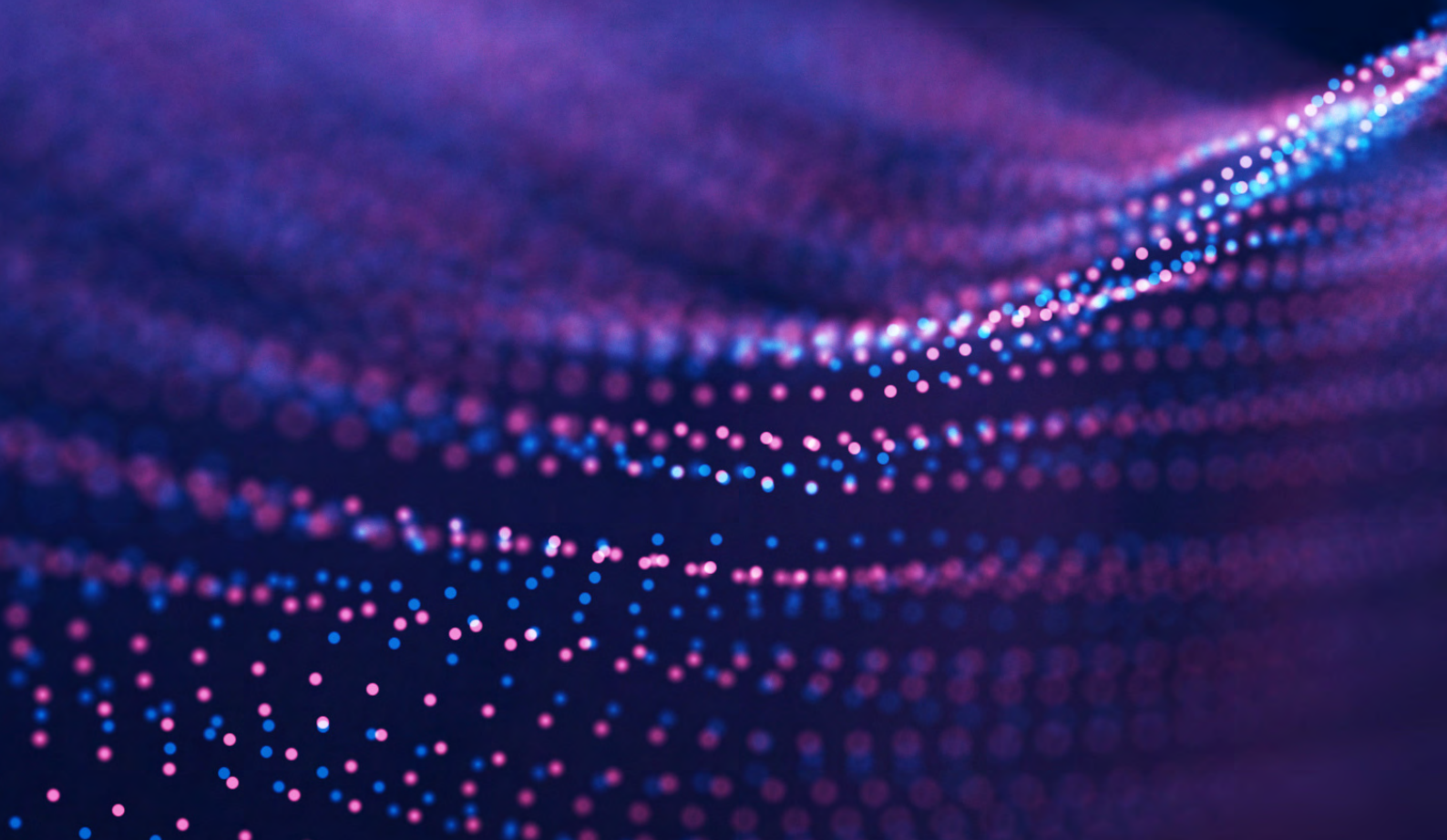
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She is Founder of the UCL Fight the Fakes Collaborating Centre, leading work on substandard and falsified medical products, medicine safety, and public health advocacy and serves on the Executive Board of the global Fight the Fakes Alliance. Oksana is also an Association of British Science Writers Media Fellow and an internationally recognised commentator on global health and pharmaceutical policy, contributing to international media and high-level policy fora relating to medicines access, digital health, pharmaceutical regulation, and healthcare resilience.



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Mike Isles is Executive Director of the non-profit independent Alliance for Safe Online Pharmacy in the EU (ASOP EU), which works to support safe and regulated online access to prescription medicines, while promoting measures to combat illegal online medicine supply and protect patients from falsified prescription medicines. As a director of ASOP EU, Mike is an executive board member of the NABP Healthcare Merchant Accreditation programme which includes promoting the use of the top-level domain name .pharmacy. ASOP EU is a Civil Society member of the EUIPO/Observatory, contributing to the expert working groups as well as an Official Observer of the Medicrime Convention – Committee of the Parties.

As such, ASOP EU collaborates closely with its sister organisation ASOP Global, as well as a broad range of stakeholders, including EU institutions, healthcare organisations, internet intermediaries, law enforcement, patient groups, and policy actors across Europe and internationally. Mike has published widely on the subject of falsified medicines and has been involved in many public-facing awareness-raising campaigns.



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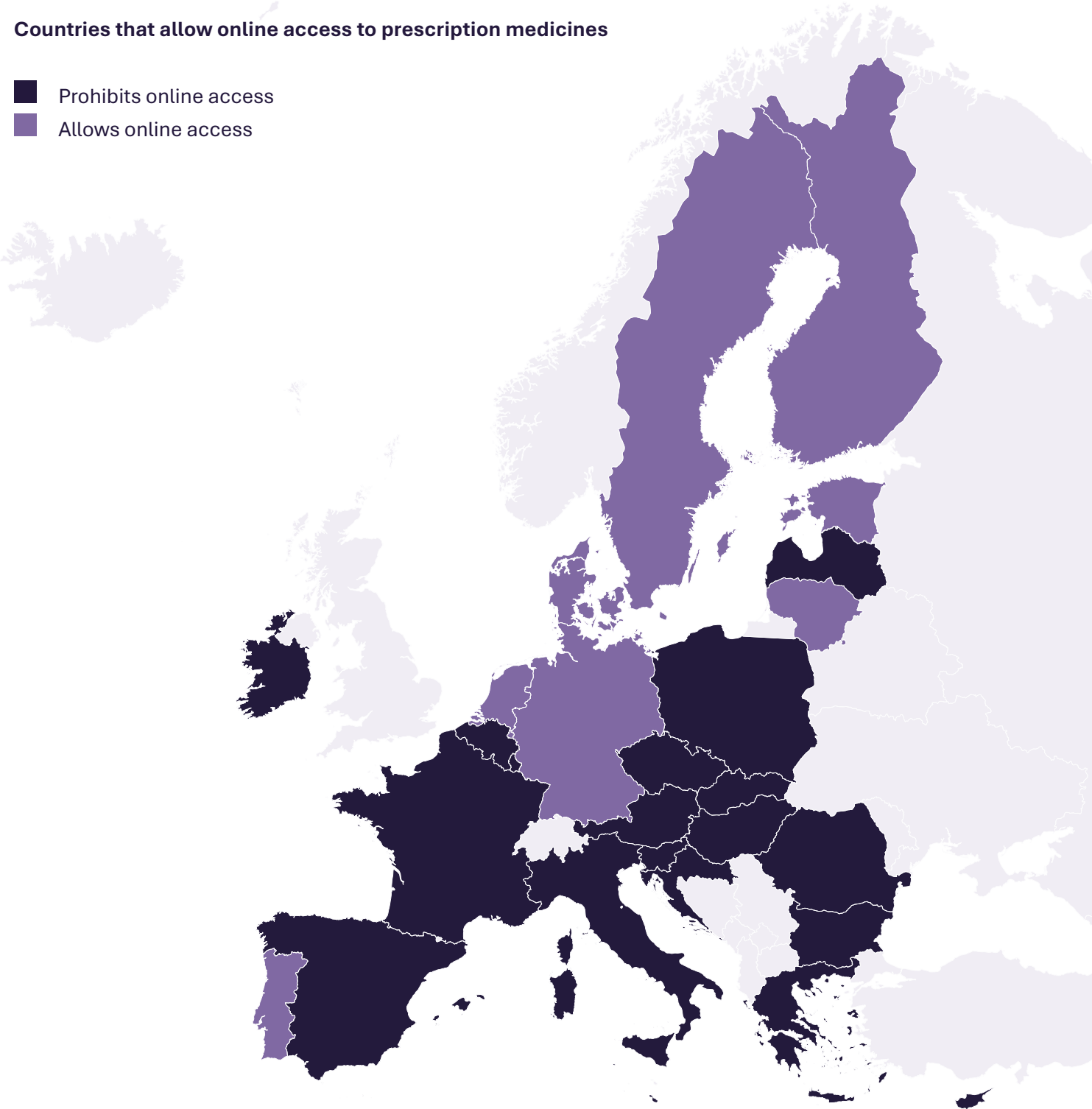
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Executive Summary

Digital Health Policy Landscape: While all EU Member States permit the online sale of non-prescription medicines, only 8 currently permit regulated online access to prescription medicines, while 19 continue to restrict access primarily to in-person dispensing models.¹

Countries that allow online access to prescription medicines

- Prohibits online access
- Allows online access



The European Union has invested substantially in digital health infrastructure over the past decade, including cross-border ePrescription services, interoperable health data systems, and the European Health Data Space (EHDS).² Despite these advances, access to prescription medicines through regulated online pharmacy services remains fragmented across the EU.

While all EU Member States permit the online sale of non-prescription medicines under harmonised conditions, only a minority currently allow regulated online access to prescription medicines.

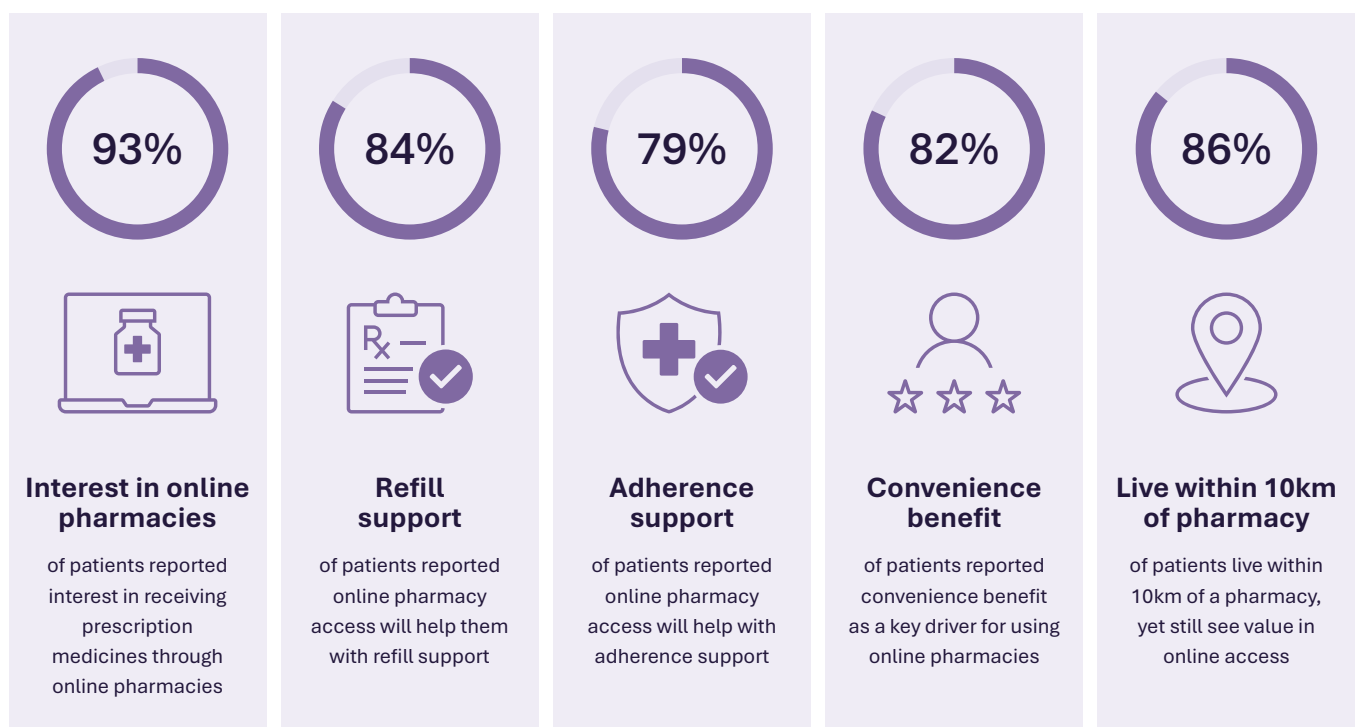
As a result, patient access to digitally enabled medicine supply pathways is determined primarily by national regulatory policy rather than patient need, healthcare system capability, or broader EU digital health objectives.

This white paper presents findings from a pan-European patient survey conducted across 24 European countries to examine patient attitudes towards online access to prescription medicines and perceived impacts on convenience, continuity of care, and medicine management.

EU Patient Perspectives on Digital Health Survey

Key findings at a glance

Strong patient demand. Clear benefits. Proximity to pharmacies.



Importantly, demand remained high despite 86% of respondents already living within 10km of a physical pharmacy, indicating that convenience, continuity of care, flexibility, and medicine management — rather than geographic access alone — are key drivers of patient demand. Qualitative findings further highlighted the importance of reducing friction in medicine access pathways for individuals managing chronic conditions, mobility limitations, immunocompromised states, or fluctuating health conditions. Patients also highlighted the importance of maintaining autonomy and independence through online pharmacy access, reducing reliance on carers, family members, or others to collect medicines on their behalf.

At the same time, the findings reinforce the importance of maintaining robust safeguards relating to medicine authentication, pharmacist oversight, pharmacovigilance, and patient safety. These safeguards are already supported through the existing EU regulatory framework, including the Falsified Medicines Directive and associated verification systems.

The findings also raise an important public health consideration. Patients increasingly seek health information, medicines, and healthcare services through digital channels. In the absence of accessible regulated online pathways for prescription medicines, demand may instead shift towards unregulated online markets and unsafe suppliers, increasing exposure to falsified or substandard medical products.

This white paper argues that the current regulatory landscape has not fully adapted to the realities of modern digital healthcare delivery. The coexistence of advanced digital infrastructure alongside fragmented online access pathways creates structural inconsistencies within the EU Single Market and contributes to inequitable access to digitally enabled healthcare services.

The paper therefore proposes that the European Union consider a targeted review and clarification of the EU framework governing the distance selling of medicinal products to support regulated online access to prescription medicines while maintaining existing safety safeguards.

Policy Recommendations

Support More Equitable Access to Regulated Online Pharmacy Services Across the EU

Support Greater Harmonisation and Digital Health Education Across Member States

Maintain and Strengthen Existing Digital Health Safety Safeguards

Integrate Online Pharmacy Pathways into Wider EU Digital Health Strategy

Support Further Research and Pilot Programmes

Introduction

Digital transformation has become a central pillar of healthcare reform across the European Union. European healthcare systems are increasingly reliant on interoperable digital infrastructure to improve continuity of care, efficiency, patient experience, and health system resilience.

Over the past decade, the EU has introduced multiple initiatives designed to support digital healthcare delivery, including:

**Cross-border
ePrescription
services**

**The eHealth
Digital Service
Infrastructure
(eHDSI)**

**The European
Health Data
Space (EHDS)**

**Strengthened
medicine
authentication
and verification
systems**

**Interoperable
digital health
records**

These developments reflect a broader transition towards digitally enabled healthcare systems capable of supporting more integrated and patient-centred models of care.

However, medicine supply pathways have not evolved consistently across Europe.

While patients increasingly interact with healthcare digitally including booking appointments, accessing laboratory results, receiving digital

prescriptions, and participating in telemedicine consultations, the ability to obtain prescribed medicines through regulated online pharmacy services remains highly variable between Member States.

As a result, significant disparities now exist across Europe regarding patient access to regulated online pharmacy services for prescription medicines.

“ Only 8 EU Member States currently permit regulated online access to prescription medicines, while 19 continue to restrict access primarily to in-person dispensing models. This has created an increasingly fragmented digital healthcare landscape across Europe.¹

”

In practical terms, this creates a two-tier digital healthcare landscape and widening inequities in digital medicine access across Europe:

- patients in some Member States are able to benefit from integrated digital prescribing and medicine supply pathways
- while patients in other Member States remain reliant exclusively on traditional in-person dispensing models

This divergence persists despite substantial advances in:

- ePrescription infrastructure
- digital authentication systems
- medicine traceability
- interoperability standards
- cybersecurity
- EU-wide data governance frameworks

When the current EU framework governing the distance selling of medicinal products was initially developed in the early 2000s, Member States had legitimate concerns regarding the absence of interoperable ePrescription infrastructure, limited data protection standards, online medicine safety and weak digital verification systems.

The digital health environment has since evolved substantially.

Today, the EU possesses significantly more mature digital health infrastructure capable of supporting secure and regulated online access models. This includes strengthened safeguards established under the Falsified Medicines Directive, medicine verification systems, electronic prescribing infrastructure, and the broader digital governance environment created through the EHDS.

At the same time, patients are increasingly exposed to medicine-related content through digital channels, including social media, online marketplaces, and digital advertising platforms. In the absence of accessible regulated pathways, patients may instead seek medicines through unregulated online sources, increasing exposure to falsified, substandard, or unsafe medical products.

Against this backdrop, this white paper examines whether the current EU regulatory approach remains aligned with:

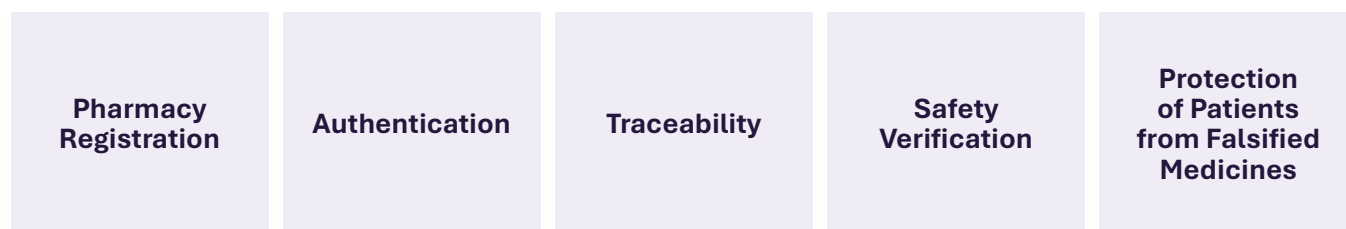
- patient expectations
- modern digital health capability
- continuity of care objectives
- broader EU digital health policy ambitions

Policy and Regulatory Context

The regulation of online access to medicines in the European Union (EU) has primarily been governed by Directive 2001/83/EC, which establishes the Community code relating to medicinal products for human use. This framework has since been revised, with EU institutions reaching an agreement on the updated Directive in December 2025. Similar to Article 85c of the previous Directive, Article 172 of the revised Directive sets out the legal framework for the distance selling of medicinal products to the public, including requirements relating to registration, authentication, and patient safety.³

Under both the 2001 framework and revised framework (expected to apply across EU Member States by the end of 2028), which remain largely similar, Member States are required to permit the online sale of non-prescription medicines under specified conditions. At the same time, they retain discretion over whether and how prescription medicines may be supplied via online channels.

This regulatory flexibility in the 2001 Directive has resulted in substantial variation across Member States. As a consequence, access to online pharmacy services for prescription medicines remains fragmented across the EU. The most recent comparative analysis indicates that only 8 Member States permit regulated models, while 19 continue to restrict access. **This framework established requirements relating to:**



As a consequence, substantial variation persists across Europe regarding regulated online access to prescription medicines.

This fragmentation now exists alongside major EU investment in digital health infrastructure, including:

- cross-border ePrescription services
- interoperable health data systems
- electronic prescribing
- the European Health Data Space

Recent legal and regulatory developments have also further clarified aspects of digital intermediary services and online medicine supply within the EU market, reflecting the rapidly evolving nature of digital healthcare ecosystems.

However, despite the existence of advanced digital infrastructure and established medicine safety mechanisms, patients across Europe continue

to experience unequal access to regulated digital medicine supply pathways.

This creates a structural policy tension:

The EU has invested heavily in enabling digital healthcare delivery, yet access to digitally enabled medicine supply remains inconsistent across Member States.

The result is a fragmented patient experience that risks undermining:

- continuity of care
- digital health integration
- patient convenience
- equitable access objectives within the Single Market

Stakeholder Collaboration and Patient Engagement

The Online Order and Home Delivery of Medicines Alliance (OnHOME) is a multi-stakeholder group comprised of 45 patient organisations and healthcare stakeholders determined to advocate for all Member States to allow their patients the choice to obtain their prescription medicines online and get them delivered at home by registered pharmacies.

For the benefit of patients across the EU it supports the following policy advancements:

- Recognise digital access to prescription medicines as a core pillar of continuity of care, cross-border health access, and healthcare system resilience
- Encourage Member States to remove outdated restrictions — no longer aligned with current practices or technological advancements — that prevent patients from obtaining medicines safely online from registered pharmacies, with home delivery, coupled with safe pharmaceutical advice
- Ensure EU-wide interoperability through the EHDS and EU Digital Identity Wallet so that patients can access and manage their prescriptions wherever they are
- Promote telepharmacy services to increase access to remote professional pharmacy care and relieve pressure on the healthcare workforce
- Build public trust by educating patients on safe digital access options and the EU Common Logo for registered e-pharmacies

Study Overview

Aim

This study aimed to assess patient attitudes towards online access to prescription medicines across Europe, with particular focus on:



Methodology

A cross-sectional online survey was conducted across 24 European countries between October 2025 and January 2026.

The study utilised a mixed-methods design combining:

- quantitative survey responses
- Likert-scale assessments
- qualitative free-text responses
- qualitative thematic analysis

Participants were recruited through patient networks, stakeholder organisations, digital dissemination channels, and professional networks.

A total of 647 responses were recorded. Following data cleaning and consent verification, 552 responses were included in the final analysis.

Countries represented included:



Ethical approval was obtained from the UCL School of Pharmacy Research Ethics Committee (Project ID 1478).

Key Findings

Strong Patient Demand Across Europe

Patient demand for regulated online access to prescription medicines was consistently high across participating countries.

Overall:

- 78.3% responded “yes” when asked whether they would like the option to receive prescription medicines through an online pharmacy service
- An additional 15.0% responded “maybe”
- Combined interest reached 93.3%

Response Option (n=433)	n/N	%
Yes	339	78.3
Maybe	65	15.0
No	29	16.7
Yes & Maybe (combined interest)	404	93.3

Interest in online access to prescription medicines (n=433)



Importantly, strong demand was observed both in:

- Member States already permitting regulated online access
- Member States where such access remains restricted

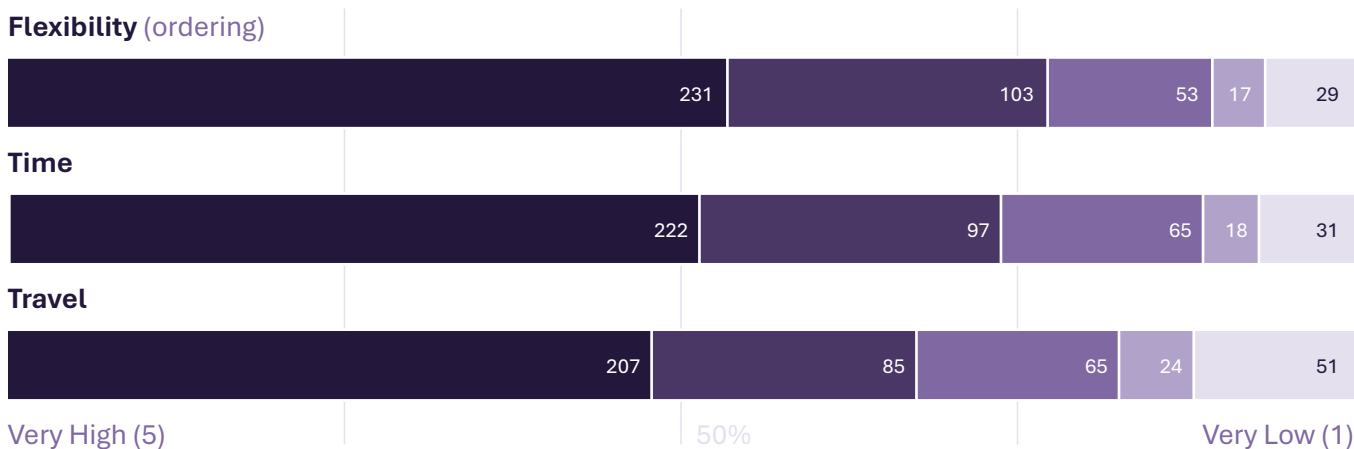
This indicates that demand is not solely driven by existing market availability.

Convenience and Efficiency Benefits

Respondents consistently identified substantial convenience benefits associated with online pharmacy services. **The strongest perceived benefits related to:**

Perceived convenience of online pharmacy services across flexibility, time, and travel domains (n=432-433)

Convenience Level	Flexibility (ordering) n/N	Time n/N	Travel n/N
Very Low (1)	29/433 (6.7%)	31/433 (7.2%)	51/432 (11.8%)
Low (2)	17/433 (3.9%)	18/433 (4.2%)	24/432 (5.6%)
Moderate (3)	53/433 (12.2%)	65/433 (15.0%)	65/432 (15.0%)
High (4)	103/433 (23.8%)	97/433 (22.4%)	85/432 (19.7%)
Very High (5)	231/433 (53.3%)	222/433 (51.3%)	207/432 (47.9%)



Denominators vary due to item-level non-response. Percentages are calculated using the number of respondents to each question.

More than half of respondents rated flexibility benefits as “very high” for:

- flexibility of ordering
- time efficiency
- reduced travel burden

The majority also reported moderate to very high benefits relating to:

- repeat prescription management
- medicine refill coordination
- routine medicine access

These findings suggest that patients perceive online pharmacy services not as a replacement for traditional pharmacy care, but as a complementary mechanism for improving medicine access pathways.

Continuity of Care and Adherence

The survey identified strong perceived benefits relating to continuity of care.

Perceived impact of online pharmacy services on adherence, refill management, and time efficiency (n=431-432)

Convenience Level	Adherence Support n/N	Refill Reminders n/N	Time Efficiency n/N
Very Low (1)	67/432 (15.5%)	47/432 (10.9%)	46/431 (10.7%)
Low (2)	29/432 (6.7%)	22/432 (5.1%)	22/431 (5.1%)
Moderate (3)	88/432 (20.4%)	70/432 (16.2%)	76/431 (17.6%)
High (4)	71/432 (16.4%)	87/432 (20.1%)	77/431 (17.9%)
Very High (5)	177/432 (41.0%)	206/432 (47.7%)	210 /431 (48.7%)

Adherence Support



Refill Reminders



Time Efficiency



Very High (5)

50%

Very Low (1)

Respondents highlighted:

- easier prescription refill management
- reduced delays in obtaining medicines
- improved ability to maintain long-term treatment routines

This was particularly relevant for:

- patients managing chronic conditions
- individuals with fluctuating health states
- those with mobility limitations
- individuals dependent on carers

Medication non-adherence remains a major public health challenge across Europe. Approximately 50% of patients with chronic conditions do not take medicines as prescribed, contributing to an estimated 200,000 premature deaths annually and approximately €125 billion in avoidable healthcare costs across Europe.⁴

The findings suggest that reducing practical barriers to medicine access may represent an important component of broader adherence-support strategies.

Qualitative Insights

Qualitative responses provided additional insight into patient experiences and perceived barriers.

Key themes included:

Illness and Mobility Barriers

Patients frequently described difficulties accessing pharmacies during periods of acute illness, disease flare-ups, fatigue, or reduced mobility.

Independence and Autonomy

Participants highlighted the importance of maintaining independence and reducing reliance on carers or family members for medicine collection.

Logistical Burden

Respondents highlighted:

- travel difficulties
- repeated journeys due to medicine shortages
- transport limitations
- time burden

Infection Risk

Some participants expressed concerns regarding exposure to infection in healthcare settings, particularly among immunocompromised individuals.

Safety Concerns

A minority of respondents raised concerns regarding:

- pharmacist oversight
- inappropriate medicine use
- prescribing errors

These findings reinforce the importance of maintaining strong regulatory safeguards and professional oversight within any expanded online access model.

Patient Perspectives on Medicine Access

“ Assistance is needed when you are unable to shop for yourself due to a flare-up of your condition. For example, in cases of myasthenia gravis, patients may have difficulty standing up or walking when their condition worsens. ”

Bulgaria

“ This service will be very helpful to me because when I need to pick up my medication from the pharmacy, I often have trouble with transportation or inaccessible surroundings. During the winter, it’s not a good idea for me to go outside. ”

Bulgaria

“ I have ulcerative colitis, and when I have diarrhoea, it’s hard to go to the pharmacy to get my medication, which usually has to be ordered, and I have to go back the next day to pick it up. ”

Czechia

“ When I’m feeling unwell, I often get very weak and would appreciate having medication delivered to my home. I also use food delivery services when I’m not feeling well. That way, I can focus on resting and following my treatment plan. Traveling is exhausting. I also don’t like being around germs—pharmacies, hospitals, public transportation... ”

Czechia

“ At present, essential prescription medicines are often out of stock in pharmacies for varying lengths of time, meaning that patients have to ring different pharmacies to check whether they have the medicine in the prescribed strength. It would be easier to search online and order the medicine for home delivery than to have to collect it from a pharmacy, which would involve travelling there. ”

Germany

“ I wouldn’t have to spend time every four weeks collecting a prescribed medicine during my GP’s surgery hours (including a visit to the pharmacy). It can happen that the surgery is closed for holidays just when I’m running out of my medicine. For chronic conditions, a subscription service that delivers medication at regular intervals would be very useful. However, I don’t have a repeat prescription; instead, I have to get it renewed by the doctor every four weeks, which can be very complicated. That’s why I sort both of these things through his in-house pharmacy. ”

Germany

“ If I’m very ill at home and my husband is at work, I can’t go and get the medicine. ”

Germany

“ It’s helpful because when my work shifts overlap with my caregiver’s, I end up without my medication. ”

Greece

“ My medication for muscle weakness is always prescribed in a 12-week supply so that I have a stock at home. As it comes in liquid form, it’s heavy, and I have to make several trips to the chemist’s because it’s all too heavy for me to carry at once, and on some days I can’t walk or carry anything at all. ”

Germany

“ With two chronic conditions (diabetes and thalassaemia major), I often have to take time off work to pick up medical supplies and get my medication from specialty pharmacies. This obstacle is yet another thing that makes my life more difficult, on top of all the health issues I’m already dealing with. ”

Romania

Implications for European Health Policy

The findings of this study have direct relevance to the evolving EU digital health agenda. It highlights the regulatory fragmentation continues to limit the extent to which patients can benefit from these developments.

This creates a growing disconnect between:

- patient demand
- digital health capability
- current regulatory practice

The current fragmentation risks creating inequitable access to digitally enabled healthcare services across the EU, where access to modern medicine supply pathways depends primarily on national regulatory variation rather than patient need.

This issue also intersects directly with broader EU concerns regarding:

- healthcare resilience
- medicine shortages
- chronic disease management
- digital inclusion
- protection against falsified medicines

The coexistence of advanced digital infrastructure alongside fragmented access pathways creates a structural inconsistency within the EU Single Market.

This highlights a widening policy misalignment between:

- patient expectations
- modern digital healthcare capability
- the current regulatory environment across the European Union

The findings suggest that the current framework has not fully adapted to the realities of modern digital healthcare delivery.

Rather, the question is whether regulated medicine supply pathways should evolve alongside broader digital healthcare transformation while maintaining appropriate safeguards.

The evidence presented in this study suggests that many patients increasingly expect healthcare systems to provide:

- flexible access pathways
- integrated digital services
- continuity of medicine access as part of routine care

Policy Recommendations

Recommendation 1: Support More Equitable Access to Regulated Online Pharmacy Services Across the EU

The European Commission should initiate a targeted review and clarification of the EU framework governing the distance selling of medicinal products with the aim of enabling more equitable access to regulated online pharmacy services for prescription medicines across all EU Member States.

As digital health infrastructure, ePrescription capability, and medicine authentication systems continue to mature across Europe, patients should have greater opportunity to benefit from safe and regulated digital medicine access pathways regardless of geographic location or national regulatory variation.

Reducing fragmentation in access to regulated online pharmacy services would support broader EU objectives relating to:

- health equity
- continuity of care
- digital inclusion
- Improved medication adherence
- patient-centred healthcare delivery
- greater alignment within the European Single Market

Any future regulatory evolution should continue to preserve the existing safeguards established under EU medicines legislation relating to medicine verification, pharmacist oversight, patient safety, and pharmacovigilance.

Recommendation 2: Support Greater Harmonisation and Digital Health Education Across Member States

The EU should explore mechanisms to reduce unnecessary fragmentation in patient access to regulated online pharmacy services while respecting Member State competencies in healthcare delivery.

Recommendation 3: Maintain and Strengthen Existing Digital Health Safety Safeguards

Any future policy development should maintain the existing safeguards established under the Falsified Medicines Directive and related EU medicines legislation, including:

- medicine authentication
- pharmacist oversight
- verification systems
- pharmacovigilance
- patient safety protections

Recommendation 4: Integrate Online Pharmacy Pathways into Wider EU Digital Health Strategy

Online access to prescription medicines should be considered within the broader context of:

- the European Health Data Space
- cross-border ePrescription services
- digital patient pathways
- healthcare system resilience

Recommendation 5: Support Further Research and Pilot Programmes

Further EU-supported research is needed to evaluate:

- real-world adherence outcomes
- healthcare utilisation
- patient safety outcomes
- health system efficiencies associated with regulated online pharmacy services

Suggested Next Steps for EU Policymakers

1. Commission a formal EU-level review of online prescription medicine access frameworks
2. Convene a multi-stakeholder expert working group involving patients, regulators, pharmacists, digital health experts, and policymakers
3. Evaluate opportunities for harmonisation within the Single Market
4. Explore pilot programmes integrating online pharmacy pathways with EHDS and cross-border ePrescription infrastructure
5. Develop future-facing regulatory guidance for digital pharmacy ecosystems within Europe

Conclusion

Europe is entering a new phase of digitally enabled healthcare delivery. Patients increasingly expect healthcare systems to provide flexible, integrated, and accessible models of care supported by secure digital infrastructure.⁵

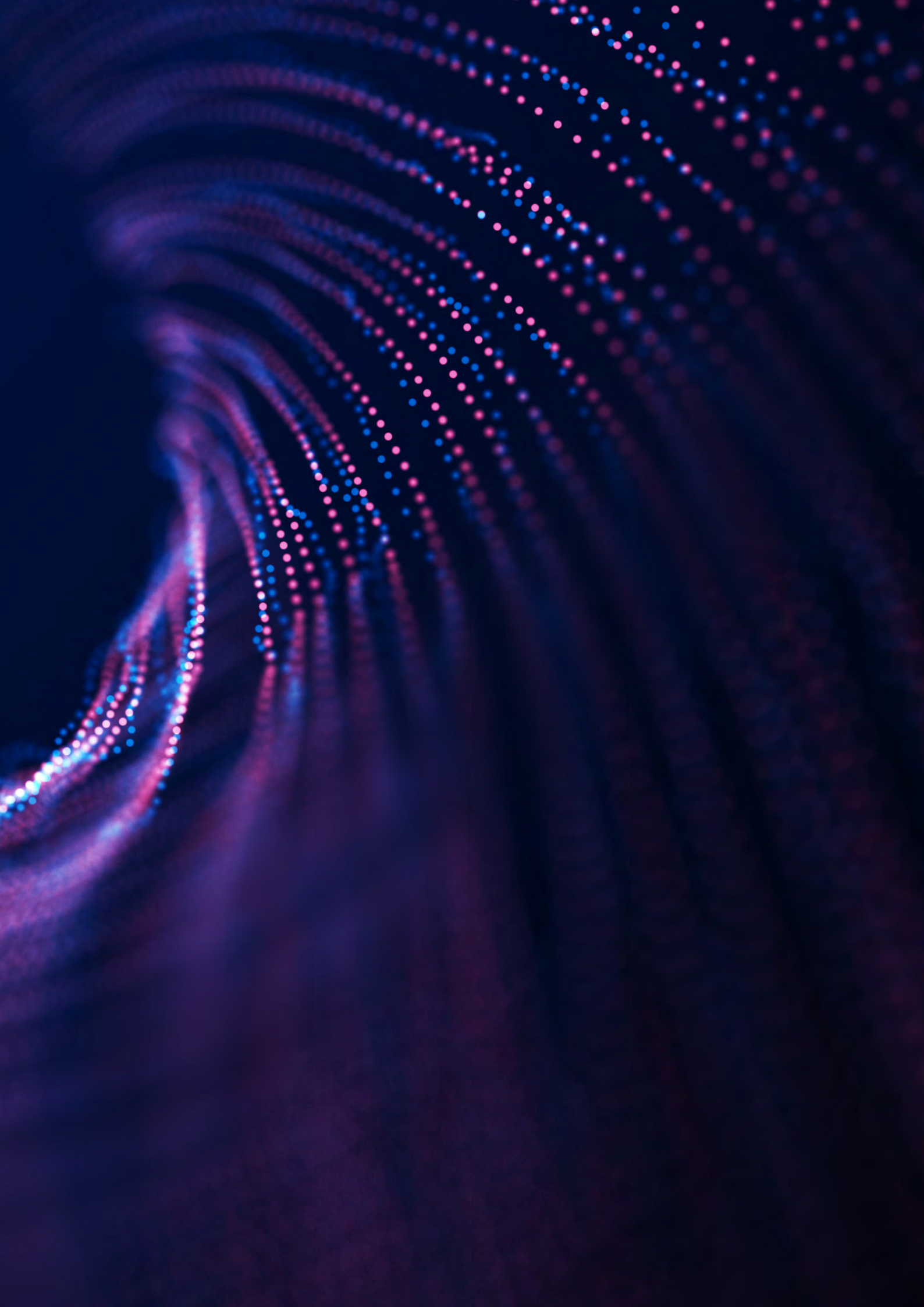
This white paper demonstrates strong patient demand for regulated online access to prescription medicines across Europe, alongside perceived benefits relating to convenience, continuity of care, medicine management, and adherence.

At the same time, the findings reinforce the importance of maintaining robust safeguards relating to authentication, verification, pharmacist oversight, and patient safety.

The evidence suggests that there is now a significant opportunity for the European Union to reassess whether the current regulatory framework governing online access to prescription medicines remains fully aligned with:

- patient expectations
- digital healthcare capability
- wider EU digital health ambitions

A carefully designed and proportionate policy approach could support more integrated, patient-centred, and resilient medicine access pathways across Europe while preserving the safeguards necessary to protect public health.



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