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**Brussels, December 6<sup>th</sup>** The European Association of Hospital Pharmacists (EAHP) welcomes the <u>Communication on medicine shortages</u> [1] adopted by the European Commission (EC), as well as The Executive Steering Group on Shortages and Safety of Medicinal Products (MSSG) <u>Toolkit on recommendations on tackling shortages of medicinal products</u> [2] and <u>MSSG Solidarity Mechanism</u> [3] adopted by the EMA. EAHP has been exploring the multifaceted nature of medicine shortages for more than a decade and providing recommendations to mitigate shortages and their impact on patients' outcome as seen in the latest <u>EAHP 2023 Shortage Survey Report.</u> [4]

EAHP has been reiterating for years that the European Shortages Monitoring Platform should be established in a way that all stakeholders may contribute to its functionality and secure the transparency of information fed in and exported out of the platform. Therefore, EAHP welcomes its launch in 2025 and hope that it will prove to be useful particularly for healthcare professionals seeking for an appropriate information on shortages.

EAHP welcomes the creation of Critical Medicines Alliance, but believes that apart from national authorities, industry, civil society representatives, the Commission and EU agencies, healthcare professional associations should also be given the possibility to come together with the aforementioned stakeholders to develop coordinated action at EU level to tackle shortages. Moreover, EAHP believes that the <u>Commission's Structured Dialogue</u> [5] demonstrated the complex nature of establishing the "criticality" of a medicine and different approaches to appoint the level of criticality. Therefore, EAHP suggests that beside the availability of alternatives and the therapeutic indication of the medicines, as parameters of criticality, patient clinical status and needs assessment performed by healthcare professionals, should also be considered when assigning the criticality of the medicine affected by the shortages.

EAHP welcomes the recommendations on mitigating supply chain vulnerabilities and tailoring joint procurement strategies, as well as creating safety stocks of medicines and medical devices. While EAHP believes that supply and demand forecasting is essential in avoiding shortages, the transparency of information given by all stakeholders involved in supply chain and healthcare provision is essential and it does not either lean only on supply or demand side of shortages. Moreover, EAHP is in favor of addressing challenges with the API production through its diversification and strengthening to avoid a major safety concern for the entire supply chain, as stated in the Communication.

EAHP supports the creation of the Union list of critical medicines, created together with healthcare professional associations' representatives to avoid the creating of an incomplete list, which will not encompass all medicines deemed critical.

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1. The European Association of Hospital Pharmacists (EAHP) is a not-for-profit organisation that defends the interests of more than 25.000 European hospital pharmacists from its 36 full and associate member organisations. EAHP works to develop knowledge on hospital pharmacy to ease the improvement of care and outcomes for patients in the hospital setting. The Association achieves this through science, practice, research, education, as well as sharing best-practice and responsibility with other healthcare professionals. More information about EAHP is available <u>HERE</u> [7].

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## Links

[1] https://commission.europa.eu/system/files/2023-10/Communication\_medicines\_shortages\_EN\_0.pdf [2] https://www.ema.europa.eu/en/documents/other/mssg-toolkit-recommendations-tackling-shortagesmedicinal-products\_en.pdf [3] https://www.ema.europa.eu/en/documents/other/mssg-solidaritymechanism\_en.pdf [4] https://www.eahp.eu/sites/default/files/shortages\_survey\_report\_final.pdf [5] https://health.ec.europa.eu/medicinal-products/pharmaceutical-strategy-europe/structured-dialoguesecurity-medicines-supply\_en#documents [6] https://www.eahp.eu/contact/info/eahp/eu [7] https://www.eahp.eu/about-us/who-we-are