



Brussels and Paris, 17 October 2023

**Re: European Commission Communication on the availability of medicines**

Dear Commissioner Kyriakides,

The European Commission has recently disclosed that it is in the final stages of preparing a Communication on the availability of medicines. Shortages of medicines are a long-standing problem in Europe, and the situation reached a very critical point last winter when the continent faced an extensive shortage of antibiotics which persisted for several months.

Member States turned to the EU to develop and establish shared and effective strategies for ensuring supply security, as the initiative promoted by Belgium in May 2023 - i.e. the [Non-paper on Improving the security of medicines supply in Europe](#) - and supported by 19 Member States exemplifies. This initiative proposes, among others, the establishment of a voluntary solidarity mechanism among Member States involving the Medicine Shortages Steering Group (MSSG) to help address and mitigate acute shortages experienced by EU countries.

To ensure the effectiveness of such a mechanism, reliable and detailed information on the availability of medicine stocks in EU countries is imperative. Member States must receive regular updates on stock levels from pharmaceutical companies and wholesalers, which is currently not the case in most countries.

For this to succeed, we encourage the Commission to call for the establishment of national requirements for manufacturers and wholesalers to consistently report their medicine stock levels to National Medicine Agencies. Such a requirement could also be included by the European parliament and/or the EU Council in the proposed EU regulation laying down Union procedures for the authorisation and supervision of medicinal products for human use, currently in the codecision process. Without transparency on stock levels, we have significant reservations about the feasibility of implementing such a voluntary solidarity mechanism and its ability to ensure patients' access to the medicines they need.

We therefore encourage the European Commission to point out, in the upcoming communication, the need for regular information of the national Medicine Agencies on **stock levels** as a prerequisite to enable an efficient functioning of the voluntary solidarity mechanism.

Kind regards,

**The undersigned organisations:**

- The European Public Health Alliance (EPHA)
- France Assos Santé
- Prescrire