



Draft CPME Statement on the Digital Green Certificate

The Standing Committee of European Doctors (CPME) represents national medical associations across Europe. We are committed to contributing the medical profession's point of view to EU and European policy-making through pro-active cooperation on a wide range of health and healthcare related issues.

CPME welcomes the European Commission proposal¹ to create a Digital Green Certificate to prove that a person has been vaccinated against COVID-19, received a negative test result, or recovered from COVID-19. While the certificate will facilitate safe free movement inside the European Union, Iceland, Liechtenstein, Norway, and Switzerland, European doctors also believe that this certificate will encourage citizens to take their responsibility of getting vaccinated. Immunisation is an individual right and shared responsibility to improve public health.

The EU must however ensure that there is no discrimination against persons who have not yet been able to get vaccinated or those who cannot be vaccinated. While vaccination is mostly free, the testing prices can be high. Therefore, the certificate should only be used to facilitate free movement when, at least, adequate and affordable access to testing is ensured in all EU Member States.

CPME also highlights the need for strong data protection safeguards on patient data and refers to the European Data Protection Supervisor and European Data Protection Board joint position in this regard.² Moreover, the risks of falsification should be considered when developing the certificate. Several cases of false COVID-19 test certificates being sold to travellers have already emerged.³

The final decision on the Digital Green Certificate should be made based on the latest scientific evidence and taking privacy and human rights issues into account.

CPME agrees that the certificate will be used temporarily until the World Health Organization (WHO) declares the COVID-19 pandemic over but encourages the European Commission to continue their work to develop a common European electronic vaccination card to be used with routine immunisation programmes.⁴ Finally, CPME reminds that the WHO International Certificate of Vaccination or Prophylaxis (ICVP) has been effectively in use and required for entry to certain countries with increased health risks already long before the COVID-19 pandemic.

¹ [Proposal for a Regulation on a framework for the issuance, verification and acceptance of interoperable certificates on vaccination, testing and recovery to facilitate free movement during the COVID-19 pandemic \(Digital Green Certificate\)](#). European Commission, 2021.

² [EDPB-EDPS Joint Opinion on the Digital Green Certificate](#). EDPB-EDPS, 2021.

³ [Europol warning on the illicit sale of false negative COVID-19 test certificates](#). Europol, 2021.

⁴ [CPME Policy on Vaccination](#). The Standing Committee of European Doctors (CPME), 2021.