

DRAFT LAW

Re: Regulation of matters relating to the National Health System, pharmaceuticals, pharmacies, and other provisions”

CHAPTER A

Regulation of matters relating to the National Health System and supervised entities

(....)

Article 6

Regulation of matters relating to hospitals

(...)

6. The outstanding debts of NHS hospitals as well as of the Papageorgiou Regional General Hospital and the Onassis Cardiac Surgery Centre, excluding the Dromokaiteio Psychiatric Hospital of Attica, the Leros Psychiatric Hospital and the Tripolis Psychiatric Hospital, which arise from the procurement of pharmaceuticals, medical supplies, reagents and orthopedic material for the period 2007-2009 and which for any reason whatsoever have not come under the scope of Article 27 of Law 3867/2010 (Government Gazette A 128), shall not be subject to the standard procedure for the clearance of arrears owed to suppliers by public entities. Such obligations shall be paid in execution of final court rulings only.

(...)

CHAPTER E

Regulation of matters relating to the National Organisation for Medicines

Article 12

Provisions on the pricing of medicinal products. Transfer of responsibilities

1. The pricing responsibilities of the Department of Prices of Medicines of the Directorate of Medicines & Pharmacies of the Ministry of Health and Social

Solidarity, as laid down in Article 69 of Law 3984/2011 (GG A 150), shall be transferred to the National Organisation for Medicines. Any reference to the Department of Prices of Medicines of the Directorate of Medicines & Pharmacies of the Ministry of Health and Social Solidarity or to the “competent service” in Article 17 of Legislative Decree 96/1973 (Government Gazette A 172) and Law 3840/2010 (Government Gazette A 53), as last amended by the provisions of Article 69 of Law 3984/2011 (A 150), shall be understood as a reference to the “National Organisation for Medicines” (EOF).

2. EOF’s service for the prices of medicines shall be staffed forthwith, by personnel transfers under Articles 71 of Law 3528/2007 and 35 paragraph 5 of Law 4024/2011 (Government Gazette A 226), with: one (1) IT expert, university graduate (staff class: AEI/IT); two (2) IT employees, Technical Educational Institute (TEI) graduates (TEI/IT); one (1) economist (AEI/Econ.); two (2) administration officers (AEI/admin.); (2) pharmacists (AEI/pharm.); and two (2) cost accountants.

3. Paragraph 2 of Article 17 of Legislative Decree 96/1973 (GG A 172), as inserted by Article 69 of Law 3984/2011 (A 150), shall be replaced as follows:

“The Pricing Committee may request any assistance from EOF on issues relating to pharmaceuticals as may be deemed necessary for the pricing process”.

Article 13

1. In paragraph 1 of Article 3 of Law 1316/1983 (GG A 3), as supplemented by Article 46 of Law 2519/1997 (GG A 165), a new indent (f) shall be added as follows: “f) the licensing of pharmaceutical wholesalers”.

2. The terms and conditions for the licensing of pharmaceutical wholesalers by EOF, the entry of the relevant provisions into force and any other detail necessary for the implementation hereof shall be specified by the Minister of Health and Social Solidarity, following a recommendation by EOF, in accordance with Article 14 paragraph 4 of Law 1316/1983.

3. At the end of paragraph 1 of Article 8 of Law 1316/1983 (GG A 3), as replaced by Article 3 of Law 1965/1991 (A 146) and supplemented by Article 47 paragraph 2 of

Law 2519 / 1997 (GG A 165), after indent (e), a new indent (f) shall be inserted, as follows:

“f. The Committee for Advanced Therapy Medicinal Products" (ATMP Committee)”.

4. At the end of Article 8 of Law 1316/1983 (GG A 3), as replaced by Article 3 of Law 1965/1991 (GG A 146) and supplemented by Article 47 paragraph 2 of Law 2519/1997 (GG A '165), a new case (f) shall be added, as follows:

“f. Committee for Advanced Therapy Medicinal Products for "(ATMP Committee).

a. The ATMP Committee shall deliver a reasoned opinion addressed to the President of the Board of Directors of EOF on any matter relating to advanced therapy medicinal products, in accordance with the provisions of Regulations (EC) 1394/2007, 668/2009 and 726/2004 and Joint Ministerial Decision DYG3(a)/83657/2005 (GG B 59/2006), as amended from time to time.

B. The Committee for Advanced Therapy Medicinal Products (ATMP Committee) shall be composed of seven (7) members, as follows: i) the representative of Greece to the Committee for Advanced Therapies (CAT) of the European Medicines Agency (EMA); ii) one representative of the Greek National Transplant Organisation (NTO); iii) one employee of the EOF's ; iv) one employee of the EOF's Inspection Section; v) one employee of the EOF's Clinical Trials/Pharmacovigilance Section; vi) two (2) scientists of recognized standing and expertise in their respective fields. By decision of the President of EOF, an EOF employee and one alternate shall be appointed Secretary to EOF.”

5. Paragraph 1 of Article 27 of Law 1316/1983 (GG A 3) shall be replaced as follows:

“1. a. The factories and laboratories manufacturing the products referred to in indents b, c, d, e, f, g, h and i of Article 2 (2) of this Law shall employ on a full time basis a Production Manager and a Quality Assurance Manager, who must be qualified chemists, pharmacists, medical doctors, biologists or veterinarians, holding a degree from a domestic University or Technical University or an equivalent foreign school.

b. The factories and laboratories manufacturing the products referred to in indents a, l and o of Article 2 paragraph 2 of this Law shall employ on a full time basis a Production Manager, who must be a qualified chemist or pharmacist or medical

doctor or biologist or veterinarian, holding a degree from a domestic University or Technical University or an equivalent foreign school.

c. The factories and laboratories manufacturing the products referred to in indents i, k, m, n and p in Article 2 paragraph 2 of this Law shall have a Responsible Officer in place; whose employment status (as full- or part-time employee or as an independent contractor) shall be irrelevant, insofar as the proper and adequate performance of his/her tasks is ensured. Such officer must be a graduate of a domestic University or Technical College or hold an equivalent degree from an accredited foreign school in a specialty relevant to the products manufactured, so that he/she can apply the standards of the products as required by the laws governing the respective product category”.

Article 14

The third sentence of paragraph 2 of Article 39 of Law 3918/2011 (GG 31/A/2 March 2011) shall be replaced as follows:

“EOF shall be entrusted with the task of pricing medicinal products for human use. Specifically, this shall involve the following:

a. responsibility for conducting price research across European countries, collection of data and determination of prices, in accordance with the provisions of current decisions of the Ministry of Health and Social Solidarity;

b. review of cost reports submitted by pharmaceutical companies;

c. responsibility for the collection and processing of data from the Pharmaceutical Price Verification Sheets, which are mandatorily submitted by all marketing authorisation holders (hereinafter referred to as MAHs) for the purpose of pricing their products;

d. responsibility for the collection of data on pharmaceutical pricing systems in place in other countries, as well as preparation and submission of recommendations to the Minister of Health on best pricing practices;

e. responsibility for the collection and processing of data on the costs and prices of medicines, raw materials, packaging and accompanying devices, as well as monitoring the evolution of a number of economic variables relevant to medicinal products;

f. responsibility for the processing of data, final determination of prices in accordance with decisions of the Minister of Health and Social Solidarity regarding the pricing of medicines, as applicable from time to time, and the submission of a recommendation re the Price Bulletin to the Department of Prices of Medicines of the Ministry of Health.

The modalities of the implementation of this paragraph and the date of its entry into force shall be laid down in a decision of the Ministry of Health and Social Solidarity.

The following responsibilities shall remain with the Department of Prices of Medicines, of the Directorate of Medicines & Pharmacies of the Ministry of Health and Social Solidarity:

a. issuance of official price bulletin determining the prices of medicines for human use, following a recommendation by EOF and the opinion of the Pricing Committee;

b. review of any objections filed by MAHs after the publication of the Price Bulletin;

c. issuance of Ministerial Decisions and recommendation for actions to be taken to protect public health and consumers;

d. referral of various subjects to the Pricing Committee, recommendation on referred matters and keeping records of the minutes of the Secretariat of the Pricing Committee;

e. ensuring the appointment of the members of the Pricing Committee.

Article 15

Paragraph 6 of Article 39 of Law 3918/2011 (GG A 31) shall be amended as follows:

“6. The Committee’s task shall be to deliver opinions on matters relating to the prices of medicinal products within EOF’s competence and referred to in indents b through i of paragraph 2 of Article 2 of Law 1316/1983 (GG 3 A), as amended and in force.

In addition, the Committee will have the following tasks:

- a. to verify medicine prices before the issuance of the Price Bulletin;
- B. to verify the outcome of appeals before the issuance of a corrective Price Bulletin;
- C. to recommend to the relevant unit of the Ministry of Health and to EOF on pharmaceutical pricing systems”.

Article 16

1. Indent d) of paragraph 5 of Article 17 of Legislative Decree 96/1973, as replaced by paragraph 2 of Article 69 of Law 3984/2011 (GG A 150), shall be replaced as follows:

In the first line, after the words “The price of each medicinal product” the words “.. which is under a valid first National or European Patent for its active substance .. ” shall be inserted.

In the same indent, line 13, the text “The price of each medicinal product...up to twice a year” shall be replaced by the following text: “The price of each medicinal product...shall be determined by EOF and published in Price Bulletins by the Department of Prices of Medicines, Directorate of Medicines and Pharmacies of the Ministry of Health and Social Solidarity up to twice a year”.

2. The first sentence of indent c) of paragraph 5 of Article 17 of Legislative Decree 96/1973, as replaced by paragraph 2 of Article 69, Law 3984/2011 (GG A 150), shall be replaced as follows:

“c) Prices of original medicines, after certification by all expedient means of the expiry of the first national or European patent of the active substance of the respective products shall be reduced to at least 50%.”

Article 17

In paragraph 3 of Article 68 of Law 3984/2011, a new subparagraph shall be inserted as follows:

“The same decision may specify additional terms, percentages and conditions of rebates, such as the volume of sales of each medicine in the respective therapeutic category and age, as well as any other objective rebate-setting criterion having an equivalent effect with the proportionate allocation of the rebate to each product in relation to the pharmaceutical spending. In any event, rebate amounts shall vary depending on whether the products are manufactured in Greece, packaged or imported. Similar decisions may specify any details on the method of calculation, allocation and collection of amounts relating to the obligation of pharmaceutical companies to pay additional rebates when public pharmaceutical expenditure exceeds the upper limits set from time to time”.

Article 18

The provisions of Articles 38 of Law 3918/2011 (GG A 31) and paragraphs 1 and 2 of Article 71 of Law 3984/2011 (GG A 150) shall be repealed.

Article 9 of Law 3457/2006 (GG A 93) shall be repealed.

Article 19

In Article 40 of Law 3918/2011, the following subparagraph shall be added:

“Similar decisions may set a fixed amount per medicine instead of profit margins or a combination of profit margins and a fixed amount, for specific categories of high-cost medicines to be defined by the same decisions, upon recommendation of EOF.”

Article 20

In Article 34 of Law 3918/2011, a new paragraph 6 shall be inserted as follows:

“6. An additional escalated rate of rebate on each sale invoice issued by pharmacies to social security funds shall be introduced as follows:

For invoices of up to €40.000	0%
For invoices of €40,000-€50.000	0.50%
For invoices of €50,000-€60.00	a further 0.75% on the previous one
For invoices of €60,000-€80.000	a further 1.00% on the previous one
For invoices of €80,000-€100.000	a further 1.25% on the previous one

For invoices of over €100,000

a further 1.50% on the previous one

The resulting total amount shall be mentioned in the invoice and shall be deducted from its value as a discount.”

Article 21

In Article 1 of Law 3868/10 (GG A 129) a new paragraph 10 shall be inserted as follows:

“10. The costs of medicines for specific diseases shall be invoiced by public hospitals and private clinics to social security funds at the hospital price plus a surcharge of 5% plus VAT.

The pharmacies of NHS hospitals shall be open all day in order to dispense prescription medicines for specific diseases to outpatients.

The amounts arising from the 5% surcharge shall be credited to the single account of paragraph 7 of Article 1 of Law 3868/11 (GG A 129/3 March 2011). The resulting revenue shall be used primarily to fund the evening operation of hospital pharmacies, in particular payments to staff, including any additional staff for the evening operation, as well as for procurement of services, goods and equipment needed for the evening operation of hospital pharmacies. Hospital pharmacists opting to participate in the evening operation shall be excluded from participating in the emergency programme during the same days.

The percentages and the terms and conditions for the allocation of this revenue shall be specified by decision of the Ministry of Health.

Medicines for specific diseases shall be dispensed to outpatients through the e-prescription system and shall be reported each month to social security funds as pharmaceutical spending. Social security funds shall be required to reimburse the cost of these drugs within the same time frame as for community pharmacies”.

CHAPTER F

Provisions on pharmaceuticals

Article 22

1. Indent c of paragraph 5 of Article 17 of Legislative Decree 96/1973 (A172), as amended by paragraph 1 of Article 40 of Law.3840/2010 (GG A), as the latter was amended by paragraph 2 of Law 3984/2011 (GG A 150), shall be replaced as follows:

“c) Prices of original medicines, after certification by all expedient means of the expiry of the first national or European patent of the active substance of the respective products shall be reduced to a maximum of fifty per cent (50%).The prices of medicines of the same active substance and pharmaceutical form shall be reduced to a maximum of sixty per cent (60%) of the price of the respective originator medicine, just before the expiry of the first national or European patent of the active substance of the originator medicine, without prejudice to paragraph 2 of this Article. The procedure for determining the prices of medicinal products under the preceding provisions shall be applied automatically by the Department of Prices of Medicines of the Directorate of Medicines and Pharmacies of the Ministry of Health and Social Solidarity.”

2. The price of any medicinal product of the same active substance and pharmaceutical form marketed after the first product of same active substance and pharmaceutical form has been marketed after the expiry of the first national or European patent of the active substance of the corresponding original, shall be reduced by at least ten per cent (10%) of the price of the first medicinal product as determined in paragraph 1 of this article.

3. Paragraph 1 of Article 38 of Law.3918/2011 (GG A 31), as amended by paragraph 1 of Law 3984/2011 (GG A 150), shall be replaced as follows:

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“1. For wholesalers of medicinal products, the gross profit margin on sales of pharmaceutical products partly or fully reimbursed by social security funds shall be set at 4.9% on the net producer or import price. Net producer or import price is defined as the wholesale price of the medicinal product reduced by 4.67%”.

4. The National Organisation for the provision of Health Services (EOPYY) and social security funds shall reimburse the original medicinal products which have obtained marketing authorisation in Greece from 1 January 2011 onwards, if they are reimbursed in eighteen (18) Member States of the European Union.

5. It shall be mandatory for pharmacies to electronically register all prescriptions to be reimbursed by social security funds, irrespective of whether an electronic or a manual prescription method has been used by the physician. For each manual prescription recorded electronically by pharmacies, the prescribing physician shall be charged with an administrative fee to compensate the pharmacy for the service of electronic recording. A decision of the Minister of Health and Social Solidarity shall define the amount, the collection method and any other detail for the implementation of this provision.

6. a) Physicians who prescribe for patients insured by EOPYY and social security funds obliged to indicate on the prescription the chemical substance of the medicine (active substance);

(b) Pharmacies dispensing medicines to the insured of EOPYY and social security funds are obliged to substitute prescribed medicines by the lowest-priced product of the same active substance, strength and pharmaceutical form prescribed by the physician;

c) the National Organisation for Medicines (EOF) shall establish and post on its website a list with active substances, that the physicians obligatorily prescribe with their chemical substance and the corresponding therapeutic categories. A decision of the Minister of Health and Social Solidarity shall specify any other detail and modalities for the implementation of the provisions of this paragraph by physicians and pharmacists.

7. A decision of the Minister of Health shall specify a lower rate of patient co-payment as defined in paragraph 1 of Article 38 of Law 4025/2011 (GG A) when the dispensed medicine is the lowest-priced product of the same active substance, strength and pharmaceutical form as the one prescribed by the physician.

8. Indent b of paragraph 1 of Article 12 of Law 3816/2010, as amended by paragraph 3 of Article 68 of Law 3984/2011, shall be replaced as follows:

“b. For the preparation, revision and supplementation of the reimbursement list a categorization system of medicinal products is applied according to the Anatomic Therapeutic Chemical classification (ATC) of the World Health Organization (WHO), and a reference price system per therapeutic category of medicinal products shall be introduced. As reference Price is defined the lowest price of a daily treatment per therapeutic category. The reference price of each therapeutic category shall be determined by calculating the cost of daily treatment (CDT) of each medicinal product. The safety and efficacy of the products and their reimbursement by at least two-thirds (2/3) of the European Union countries are also taken into account, and the indications, strengths and packages reimbursed by social security shall be selected for each medicinal product. A joint decision of the Minister of Health and Social Solidarity and the Minister of Labour and Social Security published in the Government Gazette and posted on the website of the National Organisation for Medicines shall specify the methods to be used for the classification of medicines and the calculation of the reference price per therapeutic category and of CDT, the other criteria and how the list is to be revised and supplemented. All medicinal products included in the reimbursement list shall be subject to the provisions of paragraph 1 of Article 35 of Law 3918/2011, as amended and in force from time to time.

Article 23

Paragraph 1 of Article 35 of Law 3918/2011 shall be replaced as follows:

“1. a) For each medicinal product which is prescribed by a physician and the cost of which is covered by social security funds (SSF), the and the Seamen’s Home, the notion of the “reimbursement price” (hereinafter “TKA”) shall be introduced, which is the producer or import price as defined each time by the ministerial decisions in force on the pricing of medicines, reduced by i) 9% or ii) 7%, as follows: Medicines shall be classified at level 5 of the Anatomic Therapeutic Chemical Classification – ATC system, (ATC5). For each different category (ATC5), i) when there are more than one medicinal product marketed by different marketing authorisation holders (MAHs), the TKA shall be reduced by 9%; and ii) when there is only one medicine - regardless of the number of packages - forms and strengths, marketed by a single MAH or an additional second MAH with the latter’s consent (cases of “co-

marketing”) the TKA shall be reduced by 7%. Social security funds shall reimburse the costs of prescription medicines up to the retail price reduced by the co-payment of the insured and reduced by the resulting difference between the producer/import price and the TKA. The costs reflecting the withholding of 9% or 7% shall be borne exclusively by the marketing authorisation holders (MAHs) of medicinal products and shall be considered as a rebate from MAHs to social security funds and EOPYY.

b) The amount to be paid by each company or marketing authorisation holder for medicinal products shall be calculated on the basis of the total sales per medicinal product, after deducting sales to hospitals and parallel exports according to the data of the National Organisation for Medicines (EOF). The calculation shall take into account the ratio of public to private pharmaceutical expenditure, i.e. 80%-20%.

c) In addition to the provisions of the preceding subparagraphs (a) and (b), MAHs shall be required to pay a further escalated rebate each year by the end of March, at rates varying according to the total annual volume of each medicinal product in the previous year, as shown in the table below:

Total annual sales volume per medicinal product	Rate of additional rebate further to the rebate under subparagraph (a)
€5 million - €10 million	2%
€10 million - €20 million	4%
Over €20 million	6%

To calculate the final amount, the conditions referred to in subparagraph (b) of this paragraph shall be taken into account. The additional rebate shall be calculated according to the sales of the previous half-year based on sales data of EOF and shall be paid, respectively, for the first half of the year by 31 October of each year and for the second half of the year by 31 March of the next year.

d) Subparagraphs b) and c) of this article do not apply to cases where the social security fund has joined the electronic prescription system (hereinafter “the EPS”) until the full implementation thereof or has another system in place for the electronic scanning of manual prescriptions. In these cases, the rebate amount to be paid by each

company or marketing authorisation holder shall be calculated either through the EPS or through such other system separately for each social security fund or for EOPYY and shall be allocated to the social security funds and EOPYY accordingly.

e) i) In the event of failure to pay when due the rebate under subparagraph (a) above or the additional rebate under subparagraph (c) of this paragraph, the amounts shall be collected on the basis of the procedure specified in the Code for the Collection of Public Revenues.

ii) The medicinal products for which the rebate has not been paid shall automatically be removed from the reimbursement list referred to in paragraph 1 of Article 12 of Law 3816/2010.

iii) For the rebates they have paid, pharmaceutical companies shall be entitled to a payment receipt for fiscal use.

f) A joint decision of the Minister of Economy, the Minister of Labour and Social Security and the Minister of Health and Social Solidarity shall specify the procedure, deadlines and method of payment of the rebate under subparagraph (a) and of the additional rebate under subparagraph (c) of this paragraph by the MAHs to social security funds or to EOPYY and the Seamen's Home, the allocation of the collected amount to beneficiary entities and the sanctions for non-compliance with this provision, and shall address any other matter relevant to the implementation of this article.

g) This paragraph shall take retroactive effect as of 1 January 2012.

CHAPTER G

Reorganisation of the Ministry of Health and Social Solidarity and the Ministry of Labour and Social Security

Article 24

The Directorate-General of the Ministry of Health and Social Solidarity shall be transferred to the Ministry of Labour and Social Security.

The post of the Secretary-General for Welfare shall be transferred to the Ministry of Labour and Social Security.

Article 25

As from 1 July 2012, the health sectors of social security organisations shall be part of EOPYY, excluding self-managed social insurance funds.

Article 26

The monthly pharmaceutical expenditure of EOPYY and other social security funds may not exceed, in total, one twelfth of the relevant outlay in the annual state budget. Any amounts in excess of this limit shall not be paid by EOPYY to beneficiaries (i.e. marketing authorisation holders, wholesalers and pharmacies) and may not be recovered by beneficiaries. In the event of any payment notwithstanding this restriction, the competent officers who approved such payment shall be subject to disciplinary sanctions and the unduly paid amount shall be offset against the pharmaceutical spending of the next month or returned by the beneficiaries to EOPYY, by virtue of a decision of the Minister of Health and Social Solidarity specifying the exact amount to be returned by individual recipients according to their shares in the formation of the final price of the medicine.

Article 27

Article 2, paragraph 34, sentence d, of Law 3918/2011 shall be amended as follows:
“The rate of return shall vary according to the following progressive scale; the progressive scale of the previous table shall continue to those social security funds that are not included in EOPYY:

Amount invoiced by health branch of SSF	Progressive rate of rebate on the invoiced amount	Amount per bracket	Cumulative amount per bracket
€0-€3,000	0%	0	0
€3,001- €10,000	2%	140	140
€10,001-€30,000	3%	600	740
€30,001-€40,000	5%	500	1,240

€40,001 and over	6%		
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This provision shall take effect as of 1 January 2012.”

Article 28

Health Procurement Committee

1. The second sentence of paragraph 4 of Article 8 of Law 3918/2011 shall be repealed.
2. Paragraph 1 of Article 15 of Law 3918/2011 shall be amended as follows:
“1. The provisions of Articles 1, 2, 3, 4, 5, 6, 11 and 12 of Law 3918/2011 shall take effect as of 1 January 2013. Articles 8, 9 and 10 shall take effect as of the adoption of the Comprehensive Programme for the Procurement of Goods and Services for the year 2013”.
3. Paragraph 1 of Article 16 of Law 3918/2011 shall be replaced as follows: “Until the adoption of the Comprehensive Programme for the Procurement of Goods and Services for the year 2013, the Health Procurement Committee (EPY), which shall continue to operate in accordance with Article 15 of Law 3918/2011, as amended and applicable, shall be the authority responsible for the completion of contract award and execution processes for procurements initiated under earlier procurement programmes and outstanding as at 30 June 2013.”
4. At the end of the first sentence of paragraph 2 of Article 5 of Law 3886/2010 (GG A 173), the following sentence shall be inserted: “The scope of this provision shall not include contracts for the procurement of medical technology products, pharmaceuticals and services for the NHS concluded on the basis of tender procedures under the Health Services Procurement Programme in accordance with Laws 3580/2007, 3846/2010, 3867/2010, 3868/2010 and 3918/2010 regarding the NHS, for reasons of public interest and for the protection of public health.”
5. Emergency procurements aimed to address urgent needs of health and welfare funds for medical technology products and pharmaceuticals that cannot be procured or are not in supply in the domestic market of the Hellenic Republic may be effected through the market of the Republic of Cyprus following a bilateral agreement to be signed by the relevant ministers of the two countries.

Article 29

Repealed provisions

As from the entry into force hereof, the provisions of indent g, point 1a to e inclusive, of Article 186 of Law 3852/2010 (GG A 87) shall be repealed.

Article 30

Entry into force

This Law shall enter into force as from the publication hereof, unless otherwise stated in specific provisions.

Athens February 2012

THE MINISTER OF FINANCE EVANGELOS VENIZELOS	THE MINISTER OF ADMINISTRATIVE REFORM AND E-GOVERNMENT DIMITRIOS REPPAS
THE MINISTER OF EDUCATION LIFELONG LEARNING AND ANNA DIAMANTOPOULOU	THE MINISTER OF HEALTH AND SOCIAL SOLIDARITY ANDREAS LOVERDOS
THE MINISTER OF THE INTERIOR ANASTASIOS GIANNITSIS	THE MINISTER OF LABOUR AND SOCIAL SECURITY GEORGIOS KOUTROUMANIS