

URGENT

To the Honourable
Mr Marios Salmas
Alternate Minister of Health

C.C.: Prof. Demosthenes Bouros, Chairman of the Special Committee for the Preparation of the List of Prescribed Pharmaceutical Products
Prof. Ioannis Tountas, President of EOF
Mrs Maria Skouroliakou, 1st Vice President of EOF
Mrs Panayota Litsa, Director of the medicines Directorate of EOPYY

Chalandri, April 3, 2013

Subject: Urgent issues concerning the Positive List of Prescribed Medicines

Dear honourable Minister,

Further to the issue of the Positive List of Prescribed Medicines in the previous week (Gov. Gazette 692/B/26.3.2013), we bring to your attention some of the most **urgent and serious issues**, which must be **immediately resolved**, in order for the smooth application of the Positive List to be possible and to avoid the substantial amount of discomfort and the unjustified financial encumbrance of patients. We suggestively refer below some of these issues:

1. **Packages of medicinal products that exceed one-month dosage have not been included**, thus medicinal products marketed, which are administered for chronic diseases are absent, for which however no “monthly” packages are marketed. As a result, patients are unable to access their treatments, to which they have been successfully subjected and regulated.
2. Some therapeutic categories of the Positive List include **non-marketed medicinal products**. As a consequence, the calculation of the insurance price is altered and the patients are further financially encumbered without reasonable cause.
3. In the therapeutic category **A02BC – Proton Pump Inhibitors, an unjustified restriction of compensation in specific indications has been set (Peptic Ulcer and Gastroesophageal Reflux Disease) and prescription only by gastroenterologists**. This restriction is not scientifically documented, since apart from the gastroenterologists, physicians of other specialties can diagnose and prescribe the treatment they consider necessary for their patient, such as General Physicians and Pathologists. This issue will generate substantial problems for patients, since there obligatory reference to a gastroenterologist will be required, which is a specialty numbering a small portion of physicians in Greece.
4. The **retail price must be set as the insurance price for all forms/content/packages of medicinal products included in a therapeutic category with a sole active substance /medicinal product without generics**. The determination of the participation amount for only specific contents of a

medicinal product (e.g. content titration), will material affect the correct therapeutic practice applied to patients.

5. **Products containing a combination of active substances have been categorised in the same therapeutic category, which however have only one common active substance.**
6. **The medicinal products of the List that was issued under Law 3816/2010 are absent** from the positive List which was published, in the form they were published in a recent Government Gazette (235/B'77 February 2013). For these products, it must be clarified that they are subject to normal compensation from the Social Insurance Agencies, without any financial encumbrance for the patients.
7. **In the category of Growth Hormones, as well as in Antiretroviral Medicines, an insurance price has been defined.** The determination of the participation percentage performed, has affected the unobstructed sale of these products and the access of patients to their treatment, since pharmacies of hospitals do not execute the relevant prescriptions. Both categories of medicines, based on the relevant legislative provision, can be sold only by **hospital pharmacies**, in which however, no reimbursement of the patient's participation has been provided for.
8. In the Positive List that was published, **medicinal products with different indications have been categorised in the same therapeutic category, without however the existence of therapeutic exchangeability among them.** The result is the substantial and unjustified financial encumbrance of patients.
9. Other problems.

Consequently, we kindly - but particularly - request that you proceed with the **immediate resolution of all issues that have emerged from the issue of the Positive List**, based on the relevant remarks-objections of pharmaceutical companies, in order to prevent the discomfort and unjustified financial encumbrance of patients.

We remain at your disposal for any co-operation and contribution in recording-filing the said issues.

Yours sincerely,

Konstantinos M. Frouzis
President

Pascal Apostolides
Vice President