

To
The Honourable
Mr Adonis Georgiadis
Minister of Health

Cc: Mr Demetrios Lintzeris, President of EOF
Mr Nikolaos Choulis, Chairman of the Committee for the preparation of the list

Re: Problems in the reimbursement list

Chalandri, June 4, 2014

Dear Minister,

Further to the issue of the Ministerial Decision No οικ.43066 (Gov. Gazette 1277/B/20.5.2014) regarding the approval of the reimbursement list, we would hereby like to point out the serious mistakes discovered therein. More specifically:

- Not all the new products that were priced on 11/2/2014 have been included in the positive list, although they meet the conditions prescribed by the law
- Not all objections have been included, despite the positive granting of opinion of the 2nd Degree Committee of EOF (e.g. heparins)
- Original medicinal products with no generics that have been classified at ATC5 with more than one contents (strength), are subject to an erroneous calculation as regards the Reimbursement Price, thus a difference has resulted between the Retail Price and the Reimbursement Price for certain contents and there is a high participation of patients in the treatment
- The Average Daily Dosage has been erroneously calculated, therefore an erroneous Daily Treatment Cost has emerged and subsequently an erroneous Reimbursement Price
- The same Average Daily Dosage has not been used for products with the same active substance or with different content
- Restrictions have been imposed for the reimbursement in contrast to the provisions of the Summary of Product Characteristics (SPC)
- The medicinal products of the list of Law 3816 have been erroneously classified (different active substances, different indications have been classified in one group)
- There are mistakes in the product's information (e.g. MAH, Sub-cluster name, Retail price, medicinal form etc.)

Taking into account all the above, an amending Ministerial Decision and a revised Reimbursement List must be promptly issued:

- ✓ Which will incorporate the correction of the above errors
- ✓ The Reimbursement price must be determined per content per active substance, where generics are available
- ✓ The Reimbursement Price must be equal to the Retail Price, for the original products with no generics that have been classified at ATC5 and have more than one contents

Finally, for credibility purposes, the justified decisions of the 2nd Degree Committee (positive and negative) regarding the objections of the pharmaceutical companies must be communicated to the companies.

We kindly request for your prompt actions so as to settle any distortions in the market, prevent any unfair competition issues among the companies and ensure the smooth access of patients to their treatments.

Yours sincerely,

Konstantinos M. Frouzis
President

Paschalis Apostolides
Vice President