



VISTOR  
Attn: Arnar Þórðarson  
Island

17. December 2020

sanofi-Aventis Norge AS  
Professor Kohts vei 5-17  
1366 Lysaker  
Norge

To whom it may concern,

**Pharmaceutical Law – Iceland**

Sanofi would like to address the proposed pharmaceutical law change in Island.

Article 5:

Iceland will be adding complexity with including EU-countries in addition to the Nordic countries with regards to reference countries. It would be preferable keeping the Nordic countries only, for predictability and simplicity. To ensure that Island still will be in scope for pharma companies we recommend the wording be changed to reflect Nordic countries only, using the Nordic average price. To address the volatile exchange rate, we strongly suggest using an average exchange rate towards Nordic reference countries.

Article 7:

Lowering prices of all medications with a yearly turnover of more than 20 million IKR to the lowest Nordic prices strongly reduces the attractiveness of the Icelandic market. The Icelandic market, as such, is a small market and a law change, as proposed, will have an impact on other markets across EU. Sanofi will, if the law passes, evaluate continued presence on Iceland for current and future products. It could result in both delays or absence of launching products to the market and in some cases de-registrations or a complete removal of products or company from the Icelandic market.

With regards,  
Sanofi-Aventis Norge AS

A handwritten signature in blue ink, appearing to read "Britt Moe Flatla".

Britt Moe Flatla  
Country Lead Norway & Iceland