

Ministry of Health
Skógarhlíð 6,
105 Reykjavík
Iceland

Malmö, Sweden
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Respons related to new regulations for price and reimbursement of medicinal products

It is with great surprise and concern Ferring has taken note of the new regulations for price and reimbursement of medicinal products in Iceland. The suggested changes could affect the access to medicine for the Icelandic patients and will be unpredictable for the pharmaceutical companies. For Ferring and other pharmaceutical companies, predictability and simplicity are of greatest importance and the newly suggested regulations makes it very difficult to foresee how the prices in Iceland will be decided. Our main concerns relates to the following points:

- Article 5. It is unclear which countries will be used as reference by the Medicines Agency. Currently the average of the other Nordic countries is used but the new regulations implicates that all EEA countries will be taken into consideration. It is stated that the agency will take note of the prices in the Nordics and other EEA countries. What exactly does this mean? A clarification of which and how these reference countries are going to be used is needed. It is of great importance for Ferring to have a simple and predictable system and therefore keeping the Nordic countries as the reference is strongly preferred.
- Article 7. Aiming for the lowest price country for products with a turnover exceeding ISK 20 million, regardless if it is the Nordic price but more so if all EEA countries are considered, might adversely affect the ability and willingness of the pharmaceutical companies to launch a product in Iceland. The companies will need to evaluate the limited market size in Iceland and how a low price negatively impacts prices in other European countries. We suggest that Iceland keep the current system of average prices for the Nordics in order to ensure early and broad access to medicine for the patients in Iceland.

Ferring hopes that the Ministry of Health will take note of our concerns and look forward to an updated version of the new regulations.

Kind regards
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