



ΣΥΝΔΕΣΜΟΣ ΦΑΡΜΑΚΕΥΤΙΚΩΝ ΕΠΙΧΕΙΡΗΣΕΩΝ ΕΛΛΑΔΟΣ

To  
The Honourable  
Georgios Romanias  
General Secretary of Social Security

C.c.: Mr Demetrios Kontos, President of EOPYY  
Mr K. Barous, EOPYY's Financial Department

Chalandri, February 17, 2015

Subject: Offsetting of receivables of pharma companies with Clawback & Rebates

Dear General Secretary,

According to article 39, subparagraph IA3, item 2 of Law 4254/2014 (Gov. Gazette 85/A/204), since 1-1-2015, certain provisions are abolished which include the provision of paragraph a of Article 22 of the P.D. 322/1981 that relates to the withholding of a percentage of 3% in favour of the Civil Servants Pension Fund (*MTPY*) on the payments and offsetting to the HCPs, which include the pharmaceutical companies.

In view of the said provision, EOPYY, having secured the approval by the General Secretariat of Social Insurance, adjusted its computerization system in January 2015 and does no longer provide for the withholding in favour of the *MTPY*.

Nevertheless, with its letter on 3/12/2014 to all Ministries with parallel obligation of notification of all parties involved, the *MTPY* clarifies that the expenditures realised or whose contract was executed until 31/12/2014, lawful withholding in favour of the *MTPY* and payment thereof, must be performed, regardless of the time of repayment or conclusion thereof, i.e. also in 2015.

Following the dispatch of the above letter of the *MTPY*, the payment system of EOPYY has been blocked, since EOPYY awaits the new decision of the General Secretariat of Social Insurance in order to respectively proceed with the withholding of 3% for debts that accumulated before 31/12/2014.

Consequently, we kindly request, until the General Secretariat of Social Security resolves on the said issue, that EOPYY promptly proceeds with the offsetting of the receivables of pharmaceutical companies against the clawback and the rebates, not withholding the 3%, as indeed provided for by its computerized system, since the said offsetting is electronically performed and does not affect the revenues of the *MTPY*.

Yours sincerely

Konstantinos M. Frouzis  
President

Konstantinos Euripides  
Vice President