

To:

Mr. Andreas Xanthos, Minister of Health

Mr. Pavlos Polakis, Alternate Minister of Health

Mr. Georgios Giannopoulos, Secretary General of the Ministry of Health

Halandri, 9 February 2017

Dear Mr. Minister,

In view of the fact that the Revised Price Bulletin will take effect on 16 February 2017 in respect of the last link of the pharmaceutical supply chain, i.e. pharmacies, we would like to express our concern about the delay in the issuance of the Corrective Price Bulletin and the Positive List, both of which are part of the mandatory prior procedure. Both the work of the Pricing Committee and the preparation of a new Positive List incorporating new generic and proprietor products have long been completed.

Given that the new prices have already taken effect and apply for MAHs and for public and private hospitals operating a hospital pharmacy as from 27 December 2016 and for wholesalers and cooperatives as from 27 January 2017, any deviation from the timetable, i.e. any postponement of the start of effect of the new corrective price bulletin beyond 16 February 2017 for pharmacies would cause a burden on government finances and could potentially also give rise to legal issues, such as discrimination issues. More specifically, the postponement of the start of effect for pharmacies would imply a rise in pharmacy profit margins or mark-ups, in violation of Article 40 of Law 3918/2011, as supplemented by Article 23 of Law 4052/2012.

We are confident that you share these concerns and you have already taken action to ensure adherence to the time frame specified by the legislation (16 February 2017), given that any arrangement to the contrary would jeopardize the sustainability of the social security system.

Best regards,

Olympios Papadimitriou

Vice-President of SFEE

Zefi Vostitsanou

Scientific and Regulatory Affairs Director