

EURIPID contribution to the online public consultation on the Pharmaceutical strategy for Europe

14th September 2020



The EURIPID Collaboration, which maintains the most advanced pricing database for medicinal products available for the national governments in Europe welcomes all efforts that ensure and improve access to affordable medicines for patients.

Euripid has been called by several stakeholders to include the so called real or net prices of medicinal products into the database. These calls echo the desire for more transparency of pharmaceutical pricing and prices expressed by the European Parliament¹, the WHA², OECD, national governments and stakeholders.

In response to these calls the Executive Committee of the EURIPID Collaboration would like to make the following statements.

The ultimate objective of increasing transparency of pricing and prices of medicinal products should be the improvement of patients' access to medicinal products. Due to the complexity of the pharmaceutical pricing landscape, any attempt to achieve greater transparency must be carefully considered in order to avoid any unintended negative effects, especially if this could result in sustainability and availability issues not least in countries with less-well developed public healthcare systems.

Bearing in mind the potential risks, there is a widely-held view that increased transparency could potentially help to achieve the overall objective via two means. On the one hand transparency could help the spread of best pricing practices which would lead to less administrative burden for both governmental bodies and the pharmaceutical industry, and help the more rational use of medicinal products. On the other hand transparency in combination with shared views on fair pricing principles could help the application of differential pricing thus enabling access to medicinal products in the less developed countries.

Taking into account the fact

- that the price is only one factor of pharmaceutical expenditures and access to medicines,
- that pricing is a national competence inside and outside the EU and
- that there are legal barriers to share certain pricing information,

the Executive Committee of the EURIPID Collaboration proposes that a working group should be set up to elaborate a framework for cooperation enabling the sharing of pricing information while

¹ https://www.europarl.europa.eu/doceo/document/A-8-2017-0040_EN.html

² https://apps.who.int/gb/ebwha/pdf_files/WHA72-REC1/A72_2019_REC1-en.pdf#page=25

avoiding any potential negative impact on patients' access to medicines. Governments and stakeholders would join the workforce on a purely voluntary basis.

The Executive Committee of the EURIPID Collaboration proposes that the following principles should be considered:

- All important information on pricing of medicinal products subject of the cooperation should be transparent for the participating parties including real prices, managed entry and related agreements, reimbursement conditions and volumes.
- No price distortion mechanism must be in place, except managed entry agreement, in any participating country for the medicinal products subject to the cooperation.
- The medicinal products subject to the cooperation must be exempted from the national legislation on external reference pricing of the participating countries.
- The participants of the cooperation must agree on the principles of price differentiation in an international context.

It is recognised that the above mentioned framework is out of the scope and remit of the EURIPID Collaboration at present; nevertheless, the EURIPID Collaboration offers its contribution in such an undertaking with particular respect to

- the network of competent authorities and experts in pricing and reimbursement staying behind the EURIPID Collaboration covering nearly the whole EU (ie. EURIPID Stakeholder Dialogue Platform³ established under the grant nr. 826652),
- the technical and conceptual knowledge on pharmaceutical pricing of the network (ie. Euripid Technical Guidance Document of External Price Referencing⁴ prepared under the EU grant nr. 664317) and
- its experiences in the management of a wide international cooperation on a voluntary basis in the field of pricing and reimbursement of medicinal products (www.euripid.eu).

³ <https://webgate.ec.europa.eu/hpf/network/home/79>

⁴ https://jasmin.goeg.at/432/1/EURIPID_GuidanceDocument_V8.1_310718.pdf