

Les Laboratoires Servier

Consultation with stakeholders - Reassessment of reimbursement status of combination products in ATC groups C02, C03, C07, C08 and C09 - Coversical

24 November 2008

Thank you for your letter of 3 October 2008.

Case no.:

5311-1101

5315-9

Our ref.: Elisabeth Thomsen

Referring to our consultation letter of 19 September 2008 and the Reimbursement Committee's recommendation of 5 September 2008, you state that the future reimbursement conditions for Coversical are unclear and that you therefore do not consider this to be an actual, formal consultation.

In its recommendation of 5 September 2008, the Reimbursement Committee states the following concerning reimbursement for Coversical:

“The Danish Medicines Agency and the Reimbursement Committee are currently reassessing the reimbursement status of medicinal products authorised for marketing in Denmark in the ATC groups C02, C03, C07, C08 and C09. When Coversical is marketed, the Reimbursement Committee considers Coversical to be comprised by the Reimbursement Committee's recommendations of 29 January 2008, item 8, and of 2 September 2008, item 8, on the reassessment of reimbursement status. In this assessment, the Committee has emphasised that the treatment price of Coversical is significantly higher than the treatment price of amlodipine and the least expensive ACE inhibitor in separate formulations. The Committee refers to the price information on ACE inhibitors in appendix C5 to the above recommendation of 29 January 2008. The Committee has not assessed any changes in price that have occurred after the recommendation of 29 January 2008, but the Committee presupposes that the Danish Medicines Agency in its decision will assess any price changes and their influence on the Danish Medicines Agency's decision.”

The Reimbursement Committee thus recommends the Danish Medicines Agency to consider Coversical comprised by the same remarks as those stated in the Committee's recommendations of 29 January 2008 and 2

September 2008 for medicinal products in ATC groups C09A and C09B containing the individual substances perindopril, quinapril, benazepril, fosinopril or trandolapril and the combination of perindopril and indapamide. We refer you to the Committee's recommendations that are available at the Danish Medicines Agency's website www.dkma.dk
> Companies > General reimbursement > Reassessment of reimbursement status for medicinal products.

With reference to the Committee's remarks in the Committee's recommendations, cf. above, and with reference to the fact that the treatment price of Coversical is significantly higher than the treatment price of amlodipine and the least expensive ACE inhibitor in separate formulations, the Reimbursement Committee recommended to the Danish Medicines Agency that Coversical should no longer be eligible for general reimbursement.

In its additional recommendation of 2 September 2008, the Reimbursement Committee states that the Committee presupposes that the Danish Medicines Agency in its decision will assess any changes in price and consumption and their influence on the Danish Medicines Agency's decision.

The Danish Medicines Agency has completed its assessment of the matter of future reimbursement status of all combination products in ATC groups C02, C03, C07, C08 and C09 with consideration of updated price and consumption information.

Based on the actual strengths and pharmaceutical forms marketed of the combination products in question, we have calculated the average lowest unit price in the period 25 August 2008 – 16 November 2008 for, respectively, combination products and individual substances of corresponding strengths and relevant comparable pharmaceutical forms. We have used this average lowest unit price as the basis for our evaluation. This price information can be found in **Appendix I**.

It appears from the updated price information that the average lowest unit price of the combination product Coversical tablets is DKK 5.42 for 5 mg perindopril in combination with, respectively, 5 mg and 10 mg amlodipine and DKK 7.17 for 10 mg perindopril in combination with, respectively, 5 mg and 10 mg amlodipine.

The average lowest unit price of medicinal products containing the ACE inhibitors enalapril, lisinopril and ramipril in equieffective doses corresponding to perindopril 5 mg and 10 mg amounts to between DKK 0.39 and DKK 1.35, cf. Appendix I. The average lowest unit price per day for amlodipine 5 and 10 mg in the same period amounts to DKK 0.30 – 0.39, cf. Appendix I.

This information shows that the price of the combination product Coversical is significantly higher than the sum of the prices of the less expensive ACE inhibitors and amlodipine in separate formulations.

The Danish Medicines Agency emphasises the Reimbursement Committee's referrals to the class effect within the group of ACE inhibitors, which is expressed in the Committee's recommendations of 29 January 2008 and 2 September 2008.

The Danish Medicines Agency agrees with the Reimbursement Committee that combination products may support good compliance in the use of medicinal products, but the Danish Medicines Agency does not, however, find that this circumstance in itself can justify a price that significantly exceeds the price of a combination of a less expensive ACE inhibitor and amlodipine separately. The Danish Medicines Agency does not find that there are any other special circumstances related to Coversical that can justify the price difference.

On this basis, the Danish Medicines Agency considers changing the reimbursement status of Coversical, entailing that the medicinal product would no longer be eligible for general reimbursement.

If you have any comments to the above, we encourage you to submit these comments together with an account of any other circumstances related to Coversical that may justify the price of the medicinal product. We kindly request you to submit any comments no later than **Thursday 11 December 2008**.

When the consultation period has expired, we will include your consultation response in our basis for decision on the medicinal products' future reimbursement status in Denmark. Please note that any consultation responses that we receive will be posted on our website.

This stakeholder consultation letter will be published on the Danish Medicines Agency's website. In parallel with this stakeholder consultation of your company, we have on this date initiated stakeholder consultations of companies holding marketing authorisations for combination products containing the individual substances metoprolol and felodipine, verapamil and trandolapril, captopril and hydrochlorothiazide as well as 20 mg enalapril and 6 mg hydrochlorothiazide. A copy of our stakeholder consultation letters are available at www.dkma.dk > Companies > General reimbursement > Reassessment of reimbursement status for medicinal products.

A notification about this consultation will also be sent to the Danish Society of Cardiology, Danish Endocrine Society, Danish Hypertension

Society, Danish Society for Vascular Surgery, Danish Surgical Society, Danish Medical Society, Danish Society of Nephrology, Danish Paediatric Society, Danish College of General Practitioners, Danish Stroke Society, Danish Society of Geriatrics, Danish Society of Internal Medicine, Danish Society of Clinical Pharmacology, Danish Patients and Disabled Peoples Organisations Denmark. In addition, we will notify the Danish National Board of Health, the Institute for Rational Pharmacotherapy and the Reimbursement Committee.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Elisabeth Thomsen', with a long horizontal flourish extending to the right.

Elisabeth Thomsen