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

The Danish Medicines Agency is currently reassessing the reimbursement status of medicinal products for cardiovascular diseases in ATC groups C02, C03, C07, C08 and C09.

The Reimbursement Committee submitted its first recommendation on 29 January 2008 and an additional recommendation on 2 September 2008.

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 Tarka, tablets containing 180 mg of verapamil and 2 mg of trandolapril, is DKK 7.06 and DKK 9.36 for Tarka tablets containing 240 mg of verapamil and 4 mg of trandolapril.

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The average lowest unit price of the individual substance verapamil is DKK 2.64 for 180 mg and between DKK 0.87 and DKK 2.72 for 240 mg. For trandolapril 2 mg, the average lowest unit price is DKK 0.68.

This information shows that the price of the combination product Tarka is significantly higher than the sum of the prices of the individual substances.

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 sum of the prices of the individual substances, and the Danish Medicines Agency does not find that there are any other special circumstances related to Tarka that can justify the price difference.

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

We kindly request you to submit any remarks you may have to the above 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, captopril and hydrochlorothiazide as well as 20 mg enalapril and 6 mg hydrochlorothiazide. We will also publish our consultation letter in relation to the combination of perindopril and amlodipine. 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 been 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, the Danish National Board of Health,

the Institute for Rational Pharmacotherapy and the Reimbursement Committee have been notified.

Yours sincerely,

Elisabeth Thomsen