

Sustainable access to medicines in Bulgaria

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Mr Kiril Ananiev
Minister of Health, Bulgaria

Dear Minister,

Generic medicines are essential to public health and have doubled access to medicines in major chronic diseases over the last decade across Europe. Bulgaria could take greater advantage of generic medicines with predictable policies regarding reference pricing and ensuring rational prescribing policies in oncology in line with current medical guidelines. Our experience shows that constructive efforts to work with physicians and patients can deliver positive results in terms of generic medicines competition. Each EU member state is free to choose the system of pricing and referral of medicines and when generic substitution is included as a measure, a very important condition is the existence of an electronic healthcare system with an electronic health card and electronic prescription.

Using the internal price referencing in the Positive List for the National Health Insurance Fund, Bulgaria benefits from the biggest reduction in the cost of medicines for home treatment. It is extremely important for Bulgaria to maintain a high level of competition among generic companies, avoiding market conditions that lead to generic producers withdrawing products from the market which is a very real risk.

We are also concerned about the potential concentration of the generic market in the distribution chain. Bulgaria has pharmacy/wholesale companies that are sometimes also manufacturers. By introducing pharmacy incentives such as substitution without the appropriate level of competition in the market, this could lead to a dramatic consolidation of the market with no benefits to patients or the healthcare budget. Therefore, any consideration of substitution should first consider the break-up of vertically integrated chains that could lead to excessive consolidation of the market. We would add that pharmacy substitution can only succeed in a market with alignment between physicians and pharmacists. The experience in Greece shows that this policy will not work without that alignment as Greece introduced INN prescribing in 2010 with no effect whatsoever on generic competition rates. On the contrary, this measure even limited generic competition for several years.

Finally, regarding Covid19, we commend the Bulgarian government on the strong policies that limited the impact of the first wave of the virus in Bulgaria. However, this should not lead to complacency regarding the risk of a second wave of the virus. Bulgaria is a well-known tourist destination for both the Bulgarian diaspora and European visitors. We also know that the first wave of Covid19 spread across Europe during the March ski vacation period. It is therefore imperative that Bulgaria prepares for the risk of a second wave factoring in the possible increase of tourism over the summer period. BGPharma and Medicines for Europe will happily present you with the data that we have developed regarding demand scenarios for a second wave, ICU medicines consumption patterns and manufacturing and logistics supply planning from the industry. BG Pharma is also prepared to review essential medicine needs with your government and stakeholders (ie hospitals) to ensure that Bulgaria is ready for the risk of a second wave.

We warn against the application of clawback (stability measure) to generic and biosimilar medicines as this would disproportionately impact lower cost medicines. Recent experience in Romania and Greece shows that this policy

