



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Aonad Cógaisíochta Corparáideach  
Feidhmeannacht na Seirbhíse Sláinte  
Seirbhís Aisioca Príomhchúraim  
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**Date: 23<sup>rd</sup> February 2016**

**Notice of a relevant decision under Section 24 of  
the Health (Pricing and Supply of Medical Goods) Act 2013**

**The HSE hereby notifies relevant suppliers of its decision to set / revise reference prices for the following interchangeable groups:**

Memantine 10mg film coated tablets (IC0022-002-003)  
Memantine 20mg film coated tablets (IC0022-003-003)  
Memantine 10mg/ml Oral Solution (IC0022-107-019)

**The HSE does not intend to set reference prices for the following interchangeable group at this time:**

Memantine 5mg+10mg+15mg+20mg Film Coated Tablets (IC0022-106-003) (Not reimbursed)

**The following reference prices will be effective from 01/04/2016:**

Interchangeable Group	Pack Size (other packs priced pro-rata)	Reference Price
Memantine 10mg film-coated tablets	56	€16.80
Memantine 20mg film coated tablets	28	€16.80
Memantine 10mg/ml Oral Solution	100ml	€60.70

**The HSE hereby outlines the reasons on which this decision is based:**

*(a) the ability of suppliers of the relevant listed items to meet patient demand for the relevant listed items,*  
The HSE considers that there are sufficient suppliers to meet demand. Generic penetration exceeded 85% of the reimbursed tablet market by volume in October 2015. Generic penetration of the reimbursed oral solution market was lower (around 55% by volume).

*(b) the value for money afforded by the relevant listed items,*  
There are no concerns arising which would merit delisting of Memantine at this time. However market intelligence available to the HSE indicates the reimbursement prices for some suppliers significantly exceed the net market prices.

*(c) the equivalent relevant prices (if practicably available) of the relevant listed items in all other Member States where one or more than one of the relevant listed items is marketed,*  
The HSE has interrogated the Euripid database which is shared by European pricing and reimbursement agencies on a number of occasions. Data available to the HSE when the first reference price for Memantine tablets was set in 2014 suggested that Irish generic prices were reasonable at that time. Memantine was a relatively immature generic market internationally and the HSE expected price movements would continue across the EU. Euripid data now indicates that there are substantially lower reimbursed prices reductions in at least 11 of the 15 EU member states for which pricing was available to HSE in 2014 (reductions range from 10% to 90%). In addition

generic memantine markets have opened up in countries which didn't have generic memantine in 2014 and are trading at significant discounts to current Irish prices. The HSE is setting lower reference prices to address this and to ensure Irish tablet prices are near the average / median prices in EU. Irish generic prices of the 10mg/ml oral solution are reasonable and the HSE will set the oral solution reference prices at the current generic reimbursement prices.

*(d) the relevant prices of therapeutically similar listed items,*

Memantine was the first medicine used in the treatment of Alzheimer's disease considered under reference pricing. It remains the only glutamate receptor antagonist reimbursed for Alzheimer's disease. Reviews of the pricing of other agents used in Alzheimer's disease are ongoing.

*(e) the resources available to the Executive, and*

The 2016 outlook is extremely challenging for the Health Service Executive. The HSE must maximise the use of the resources available to it.

*(f) the terms of any agreement in place (whether entered into before, on or after the commencement of this section) between the Executive and any representative body of the suppliers of drugs, medicines or medical or surgical appliances where the agreement relates, whether directly or indirectly, to the price of one or more of those items.*

The HSE received one representation related to this set of reference prices. The HSE has considered that representations but on balance has decided to progress the reference price to which the representation referred.

**Overview of Reasons:**

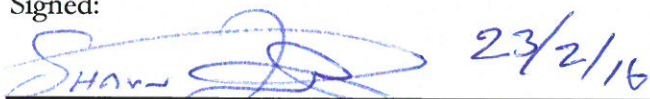
The HSE is mandated to deliver the maximum savings possible commensurate with maintaining supplies in the market place to meet patient needs. The HSE faces significant resource challenges in 2016. European pricing data and market intelligence available to the HSE supports reducing the reference prices for tablets. The HSE has considered the representation received. Generic oral solution prices appear to be reasonable as reference prices.

**Additional Information**

The HSE is frequently asked to clarify the prices to wholesale & reimbursement prices which would match an individual reference price. The HSE provides these below for information. The HSE will implement any notified reimbursement prices changes on the 1st April 2016.

Price to wholesale	Reimbursement Price	Reference Price
€15.56	€16.80	€16.80
€15.56	€16.80	€16.80
€56.20	€60.70	€60.70

Signed:



Shaun Flanagan MPSI  
Chief I Pharmacist