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2026004434

**National Health Care
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Research, Development and
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Date 12 March 2026
Re: package advice medicinal products for allergies

Case number

2023011160

Our reference

2026004434

Dear Ms Hermans,

Your reference

3537770-10444456-Z

Your letter of

9 March 2023

In the Netherlands, we aim to provide good healthcare for everyone, now and in the future. However, our healthcare system is under pressure. The increasing demand for healthcare, leading to higher care expenditure, puts pressure on solidarity and crowds out other important collective spending.

Usually, package advice is about (very) expensive healthcare for people with a high burden of disease, such as in case of cancer where the discussion focuses on what we as a society can collectively afford. With the question of 'care that necessarily needs to be insured', we focus on the lower limit of what we as a society want to pay.

In the letter of 9 March 2023, your predecessor asked the National Health Care Institute to phase in the decision framework on need for insurance developed by the National Health Care Institute for a certain group of medicinal products. These are medicinal products included in the Medicine Reimbursement System (GVS) for which there are (virtually) equivalent alternatives that can be purchased over the counter, and for which the costs may be borne by the insured person.

In this report, we apply the decision framework to medicinal products used for allergic symptoms. The reimbursement of these (self-care) medicinal products is subject to Annex 2 conditions.

National Health Care Institute advice

The National Health Care Institute advises not to amend the reimbursement conditions for medicinal products for allergies set out in List 2 of the Healthcare Insurance Regulations.

We have based this advice on the review of the package criteria, stakeholder consultation responses and discussion in the Package Advisory Commission (ACP). In this advice, the National Health Care Institute considers it necessary that the current reimbursement condition is strictly observed, so that reimbursement of these medicinal products is limited to the treatment of a chronic condition where the insured person is reliant on the medicinal product for more than six months in a row.

The attached report contains our considerations and also takes into account the ACP advice and reactions from stakeholders.

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Background information

- Medicinal products for allergies include antihistamines and cromones. These medicinal products are intended for the symptomatic treatment of allergic rhinitis, allergic conjunctivitis, itching and hives (urticaria). They can be used as tablets, capsules, oral solutions, nasal sprays, or eye drops. Both prescription and non-prescription medicinal products for allergy are included in the GVS.
- The reimbursement of medicinal products for allergies is subject to additional conditions.¹ List 2 states that the reimbursement is limited to the treatment of a chronic condition, with the product being used continuously for at least six months.
- In 2023, almost 1.5 million people in the Netherlands were reimbursed for medicinal products for allergies. The total reimbursement amount was €54,754,000 excluding VAT. Of these costs, €20,230,000 was for the medicinal product itself and €34,524,000 for pharmacy costs. According to the stakeholders, the cost of medicinal products has been overestimated because health insurance companies have reached price arrangements with suppliers. However, the discounts are confidential.
- The average reimbursement is low, i.e. €37.25 per user per year. However, there are individual differences. For some people, the costs can be considerable.

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Outcomes of the necessity assessment

We have assessed the medicinal products for allergies included in the GVS against the 2023 decision framework on need for insurance. On the basis of this review, we have reached the following conclusions:

1. Non-chronic use of medicinal products for allergies is not a care that is necessary to insure.
The burden of disease of allergic disorders is classified as very low to low and the costs of short-term use of these products are low. Therefore, a use shorter than six months is not 'necessary to insure care'.
2. Chronic use of medicinal products in case of allergy as part of appropriate care is a care that is necessary to insure.
Chronic use can result in high total costs for some patients. If these medicinal products are no longer reimbursed, there is a risk of substitution to more expensive care. Therefore, the appropriate use of a medicinal product for an allergy that lasts longer than six months, is necessary to insure care'.
3. Two-thirds (66%) of the people who received reimbursement for an oral anti-allergy medicine in 2023 were using the medicinal product for less

¹ List 2 of the *Health Insurance Regulations*, section 35.

Laxatives, **medicinal products for allergy**, anti-diarrhoea, gastric emptying and anti-dehydration eye medicinal products that can be dispensed without prescription under the Pharmaceutical Act and other medicinal products with the same active substance and in the same form of administration.

Condition: only for an insured person who, according to the prescription, has been prescribed the medicinal product for more than six months continuously and for whom the medicinal product has been prescribed for the treatment of a chronic condition, unless it is new medication for the insured person.

than six months. They did not meet the conditions for reimbursement and this is considered non-appropriate care.

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Other considerations

- The stakeholders indicate that they have experienced implementation problems. It is not always clear beforehand when there will be chronic use of at least six months. The National Health Care Institute is meeting with representatives of the general practitioners and pharmacists to see how the feasibility can be improved in practice.
- Some stakeholders also warn against substitution: if in some cases medicinal products for allergies are no longer reimbursed, they expect a shift to other, more expensive medicinal products that are reimbursed. Substitution solely for the purpose of reimbursement is non-appropriate care. In 2028, the National Health Care Institute will monitor the effect in practice. If necessary, the National Health Care Institute will advise you again.

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Package advice

Taking everything into consideration, the National Health Care Institute advises not to amend the reimbursement conditions for medicinal products for allergies in List 2 of the Healthcare Insurance Regulations.

Continuation for other self-care products

In your letter of 9 March 2023, you asked the National Health Care Institute to phase in the decision framework for GVS medicinal products that are also for sale without a prescription or for which (almost) equivalent non-prescription alternatives exist. In addition to medicinal products for allergies, other groups of self-care medicinal products are included in List 2 of the Health Insurance Regulations. These include laxatives, anti-diarrhoea products, gastric emptying and eye protection products, and anti-acid products.

It is unclear whether these self-care medicinal products are reimbursed only for chronic use, as intended. That is why the National Health Care Institute first wants to explore the extent to which the reimbursement conditions for these medicinal products have been complied with. On this basis, we will, in consultation with your ministry's staff, consider which actions are most appropriate to answer your question.

Finally, the National Health Care Institute would like to point out that the above-mentioned considerations for a phase-out are not limited to medicinal products for allergies. The identified implementation problems, the high risk of substitution and thus overestimation of potential savings will also apply to a potential phase-out of other self-care products. Several past cases have also shown this, with vitamin D as the best-known example. When cheap products are phased out of the package, general practitioners, physicians, pharmacists and patients can look for other medicinal products that are still being reimbursed. The medicinal products that are prescribed in those cases are generally more expensive than those that have been phased out. So, in addition to checking compliance with the current List 2 conditions, the National Health Care Institute would like to discuss the usefulness and necessity of completing the request as indicated in the above-mentioned letter of 9 March 2023.

Yours sincerely,

M.J. Janssen
Chairperson of the Executive Board

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Enclosed: Report 'Package advice for medicinal products for allergies'