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New MD on Individual Distribution of High-Cost Medicines: What It Really Changes

December 9, 2025

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On November 27, 2025, Ministerial Decision EALE/G.P. oik. 51724/2025 (Government Gazette B 6333/27.11.2025 – the "MD") was issued, setting out updates to the framework governing the individual distribution of High-Cost Medicines (FYK, per their Greek acronym) procured by the National Organization for Health Care Services (EOPYY) and dispensed through private pharmacies as the final delivery point.

Crucially, the MD **does not** introduce full liberalization of FYK retail distribution through private pharmacies. FYK remain **exclusively supplied by EOPYY** and we are still expecting a Ministerial Decision that will determine the specific profit rate of wholesalers and pharmacies, as well as the applicable rebates.

What the MD *Does Not* Do

- It does not open the private distribution channel for FYK.
- It does not allow private pharmacies or private warehouses to source FYK independently.
- It is not the long-expected reform on full release of FYK supply and distribution.

What the MD *Actually* Does

- It updates and clarifies the process of individual distribution of FYK via a private pharmacy, keeping EOPYY as the central supplier.
- It reinforces the operational role of pharmacists, who now select the delivery route.
- It publishes an updated list of active pharmaceutical substances eligible for individual distribution.

Update: A Clearer Set of Delivery Options

The most essential update introduced by the new MD relates to how FYK are shipped to private pharmacies. Under the previous decision, delivery was described simply as occurring "either directly or via warehouses used by pharmaceutical companies."

The new MD replaces this with a more detailed and structured description of the available delivery routes. It now specifies that FYK may reach private pharmacies through any of the following channels:

1. Dispatch coordinated by the pharmaceutical company (without the use of a warehouse),
2. Dispatch via a certified medicine-shipping company, or
3. Dispatch via private warehouses used by the pharmaceutical company.

In addition, the MD clarifies that EOPYY's warehouse departments are involved in initiating the dispatch procedure, while the **pharmacist selects the preferred mode of delivery** among the options available.

Final Remark

This MD is a procedural clarification, not a reform.

It strengthens pharmacists' operational role and improves workflow transparency, but FYK continue to be supplied exclusively by EOPYY and dispensed through private pharmacies, with no change to the underlying distribution rights.

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