

Justification

to the Resolution of the Federal Joint Committee (G-BA) on
an Amendment of the Pharmaceuticals Directive:
Annex XII – Benefit Assessment of Medicinal Products with
New Active Ingredients according to Section 35a SGB V

Belzutifan
(von Hippel-Lindau (VHL) disease-associated tumours)

of 18 September 2025

Contents

1.	Legal basis.....	2
2.	Key points of the resolution.....	2
2.1	Additional benefit of the medicinal product in relation to the appropriate comparator therapy	3
2.1.1	Approved therapeutic indication of Belzutifan (Welireg) in accordance with the product information	3
2.1.2	Appropriate comparator therapy.....	3
2.1.3	Extent and probability of the additional benefit.....	5
2.1.4	Summary of the assessment	6
2.2	Number of patients or demarcation of patient groups eligible for treatment	7
2.3	Requirements for a quality-assured application	7
2.4	Treatment costs	7
2.5	Designation of medicinal products with new active ingredients according to Section 35a, paragraph 3, sentence 4 SGB V that can be used in a combination therapy with the assessed medicinal product	10
2.6	Percentage of study participants at study sites within the scope of SGB V in accordance with Section 35a, paragraph 3, sentence 5 SGB V	13
3.	Bureaucratic costs calculation.....	13
4.	Process sequence	13

1. Legal basis

According to Section 35a paragraph 1 German Social Code, Book Five (SGB V), the Federal Joint Committee (G-BA) assess the benefit of all reimbursable medicinal products with new active ingredients. This includes in particular the assessment of the additional benefit and its therapeutic significance. The benefit assessment is carried out on the basis of evidence provided by the pharmaceutical company, which must be submitted to the G-BA electronically, including all clinical studies the pharmaceutical company have conducted or commissioned, at the latest at the time of the first placing on the market as well as the marketing authorisation of new therapeutic indications of the medicinal product, and which must contain the following information in particular:

1. approved therapeutic indications,
2. medical benefit,
3. additional medical benefit in relation to the appropriate comparator therapy,
4. number of patients and patient groups for whom there is a therapeutically significant additional benefit,
5. treatment costs for the statutory health insurance funds,
6. requirements for a quality-assured application.
7. Number of study participants who participated in the clinical studies at study sites within the scope of SGB V, and total number of study participants.

The G-BA may commission the Institute for Quality and Efficiency in Health Care (IQWiG) to carry out the benefit assessment. According to Section 35a, paragraph 2 SGB V, the assessment must be completed within three months of the relevant date for submission of the evidence and published on the internet.

According to Section 35a paragraph 3 SGB V, the G-BA decide on the benefit assessment within three months of its publication. The resolution is to be published on the internet and is part of the Pharmaceuticals Directive.

2. Key points of the resolution

The relevant date for the start of the benefit assessment procedure was the first placing on the (German) market of the active ingredient belzutifan on 1 April 2025 in accordance with Chapter 5 Section 8, paragraph 1, number 1, sentence 2 of the Rules of Procedure (VerfO) of the G-BA. The pharmaceutical company submitted the final dossier to the G-BA in accordance with Section 4, paragraph 3, number 1 of the Ordinance on the Benefit Assessment of Pharmaceuticals (AM-NutzenV) in conjunction with Chapter 5 Section 8, paragraph 1, number 1 VerfO on 31 March 2025.

The G-BA commissioned the IQWiG to carry out the assessment of the dossier. The benefit assessment was published on 1 July 2025 on the G-BA website (www.g-ba.de), thus initiating the written statement procedure. In addition, an oral hearing was held.

The G-BA came to a resolution on whether an additional benefit of belzutifan compared with the appropriate comparator therapy could be determined on the basis of the dossier of the pharmaceutical company, the dossier assessment prepared by the IQWiG, and the statements submitted in the written statement and oral hearing procedure. In order to determine the extent of the additional benefit, the G-BA have evaluated the data justifying the finding of an additional benefit on the basis of their therapeutic relevance (qualitative), in accordance with the criteria laid down in Chapter 5 Section 5, paragraph 7 VerfO. The methodology proposed by the IQWiG in accordance with the General Methods ¹ was not used in the benefit assessment of belzutifan.

In the light of the above, and taking into account the statements received and the oral hearing, the G-BA have come to the following assessment:

2.1 Additional benefit of the medicinal product in relation to the appropriate comparator therapy

2.1.1 Approved therapeutic indication of Belzutifan (Welireg) in accordance with the product information

WELIREG is indicated as monotherapy for the treatment of adult patients with von Hippel-Lindau disease who require therapy for associated, localised renal cell carcinoma (RCC), central nervous system (CNS) haemangioblastomas, or pancreatic neuroendocrine tumours (pNET), and for whom localised procedures are unsuitable.

Therapeutic indication of the resolution (resolution of 18.09.2025):

See the approved therapeutic indication

2.1.2 Appropriate comparator therapy

The appropriate comparator therapy was determined as follows:

Adults with von Hippel-Lindau disease-associated renal cell carcinoma (RCC), central nervous system (CNS) haemangioblastomas, or pancreatic neuroendocrine tumours (pNET), for whom localised procedures are unsuitable and who require therapy

Appropriate comparator therapy for belzutifan as monotherapy:

- Monitoring wait-and-see approach

Criteria according to Chapter 5 Section 6 of the Rules of Procedure of the G-BA and Section 6 paragraph 2 Ordinance on the Benefit Assessment of Pharmaceuticals (AM-NutzenV):

The appropriate comparator therapy must be an appropriate therapy in the therapeutic indication in accordance with the generally recognised state of medical knowledge (Section 12 SGB V), preferably a therapy for which endpoint studies are available and which has proven

¹ General Methods, version 7.0 from 19.09.2023. Institute for Quality and Efficiency in Health Care (IQWiG), Cologne.

its worth in practical application unless contradicted by the guidelines under Section 92, paragraph 1 SGB V or the principle of economic efficiency.

In determining the appropriate comparator therapy, the following criteria, in particular, must be taken into account as specified in Chapter 5 Section 6, paragraph 3 VerfO:

1. To be considered as a comparator therapy, the medicinal product must, principally, have a marketing authorisation for the therapeutic indication.
2. If a non-medicinal treatment is considered as a comparator therapy, this must be available within the framework of the SHI system.
3. As comparator therapy, medicinal products or non-medicinal treatments for which the patient-relevant benefit has already been determined by the G-BA shall be preferred.
4. According to the generally recognised state of medical knowledge, the comparator therapy should be part of the appropriate therapy in the therapeutic indication.

According to Section 6, paragraph 2, sentence 2 Ordinance on the Benefit Assessment of Pharmaceuticals (AM-NutzenV), the determination of the appropriate comparator therapy must be based on the actual medical treatment situation as it would be without the medicinal product to be assessed. According to Section 6, paragraph 2, sentence 3 Ordinance on the Benefit Assessment of Pharmaceuticals (AM-NutzenV), the G-BA may exceptionally determine the off-label use of medicinal products as an appropriate comparator therapy or as part of the appropriate comparator therapy if it determines by resolution on the benefit assessment according to Section 7, paragraph 4 that, according to the generally recognised state of medical knowledge, this is considered a therapy standard in the therapeutic indication to be assessed or as part of the therapy standard in the medical treatment situation to be taken into account according to sentence 2, and

1. for the first time, a medicinal product approved in the therapeutic indication is available with the medicinal product to be assessed,
2. according to the generally recognised state of medical knowledge, the off-label use is generally preferable to the medicinal products previously approved in the therapeutic indication, or
3. according to the generally recognised state of medical knowledge, the off-label use for relevant patient groups or indication areas is generally preferable to the medicinal products previously approved in the therapeutic indication.

An appropriate comparator therapy may also be non-medicinal therapy, the best possible add-on therapy including symptomatic or palliative treatment, or monitoring wait-and-see approach.

Justification based on the criteria set out in Chapter 5 Section 6, paragraph 3 VerfO and Section 6, paragraph 2 AM-NutzenV:

- On 1. No medicinal products specifically approved for this indication are available for the planned therapeutic indication.
- On 2. A non-medicinal treatment cannot be considered in this treatment setting.
- On 3. In the planned therapeutic indication, there are no resolutions approved by the G-BA on the benefit assessment of medicinal products with new active ingredients according to Section 35a SGB V or of non-medicinal treatments.

On 4. The generally recognised state of medical knowledge was illustrated by a systematic search for guidelines as well as systematic reviews of clinical studies in the present indication and is presented in the "Research and synopsis of the evidence to determine the appropriate comparator therapy according to Section 35a SGB V".

The scientific-medical societies and the Drugs Commission of the German Medical Association (AkdÄ) were also involved in writing on questions relating to the comparator therapy in the present therapeutic indication according to Section 35a, paragraph 7 SGB V.

For determining the appropriate comparator therapy, it is assumed that patients in the metastatic stage are not included in the therapeutic indication.

According to the current state of medical knowledge, the therapy standard for von Hippel-Lindau disease-associated renal cell carcinoma (VHL-RCC), central nervous system (CNS) haemangioblastomas, or pancreatic neuroendocrine tumours (pNET) is surgical resection. The aim of resection is in particular the avoidance of metastases or functional impairments. For VHL-RCC and pNET ≤ 3 cm, the available evidence suggests a low risk of metastasis, which is why it is generally observed until a tumour size of ≤ 3 cm is reached and resection is only performed from a tumour size of > 3 cm. CNS haemangioblastomas are also closely monitored and surgical intervention is considered if, among other things, increased growth is detected.

According to the therapeutic indication, patients are not eligible for local therapies. Therefore, the monitoring wait-and-see approach is determined as the appropriate comparator therapy.

The findings in Annex XII do not restrict the scope of treatment required to fulfil the medical treatment mandate.

A change in the appropriate comparator therapy requires a resolution by the G-BA linked to the prior review of the criteria according to Chapter 5 Section 6, paragraph 3 Rules of Procedure.

2.1.3 Extent and probability of the additional benefit

In summary, the additional benefit of belzutifan is assessed as follows:

An additional benefit is not proven.

Justification:

Data basis

For the benefit assessment, the pharmaceutical company presented the LITESPARK 004 study. The ongoing, open-label, single-arm LITESPARK 004 study is the pivotal phase II study on the basis of which belzutifan was granted the conditional marketing authorisation. Adults with confirmed von Hippel-Lindau syndrome and at least one solid clear cell renal cell carcinoma with a diameter of no more than 3 cm at the time of screening were enrolled. Further von Hippel-Lindau disease-associated tumours in other organs were permitted. 61 patients from 4 countries (Europe and USA) were enrolled in the study. The primary endpoint was objective response rate. Belzutifan was dosed in accordance with the marketing authorisation. For the benefit assessment, the pharmaceutical company used the data cut-off from 1 April 2024 with a median treatment and observation period of around 5 years.

Von Hippel-Lindau Natural History Study (based on National Cancer Institute Urologic Oncology Branch Von Hippel-Lindau Hereditary Database)

The Von Hippel-Lindau Natural History Study is a retrospective, non-interventional study based on data from the National Cancer Institute Urologic Oncology Branch Von Hippel-Lindau Hereditary Database. 244 patients with confirmed von Hippel-Lindau disease and at least one solid kidney tumour who were treated at the National Institutes of Health Clinical Center in Bethesda (USA) were enrolled in the study. Patients were not allowed to have received interventional therapy 30 days before or after the first radiological evidence of a solid kidney tumour during the study period. The median observation period was around 10 years (31.07.2004 to 30.06.2020). The primary endpoint of the study was tumour size; results on side effects were not collected.

Comparator data

The pharmaceutical company presented a descriptive comparison between the LITESPARK 004 study and the Von-Hippel-Lindau Natural History study. Effect estimators were not calculated.

Assessment

There is no randomised controlled trial for the comparison of belzutifan with the appropriate comparator therapy. As the pivotal LITESPARK 004 study is an uncontrolled study, the pharmaceutical company made a purely descriptive comparison with the retrospective, non-interventional Von Hippel-Lindau Natural History study for the assessment of the additional benefit.

This comparison is inappropriate for the benefit assessment, as the necessary structural equality between the treatment groups is not guaranteed. In addition, the clinical picture of von Hippel-Lindau disease is very heterogeneous according to the clinical experts in the written statement procedure and the treatment and observation periods vary greatly between the two studies (5 versus 10 years), so that the results cannot be interpreted meaningfully due to the lack of adjustment for the available effect sizes. In addition, no results on side effects were collected on the comparator side, so that an overall assessment of potential effects across all endpoint categories is not possible, regardless of the points of criticism already mentioned.

Conclusion

Overall, the data presented are unsuitable to demonstrate an additional benefit of belzutifan compared with the appropriate comparator therapy, which is why an additional benefit of belzutifan is not proven for the treatment of adults with von Hippel-Lindau disease-associated renal cell carcinoma (RCC), central nervous system (CNS) haemangioblastomas, or pancreatic neuroendocrine tumours (pNET), for whom localised procedures are unsuitable and who require therapy.

2.1.4 Summary of the assessment

The present assessment concerns the benefit assessment of the new medicinal product Welireg with the active ingredient belzutifan. Welireg received a conditional marketing authorisation.

The therapeutic indication assessed here is as follows:

WELIREG is indicated as monotherapy for the treatment of adult patients with von Hippel-Lindau disease who require therapy for associated, localised renal cell carcinoma (RCC),

central nervous system (CNS) haemangioblastomas, or pancreatic neuroendocrine tumours (pNET), and for whom localised procedures are unsuitable.

The monitoring wait-and-see approach was determined as the appropriate comparator therapy.

For the benefit assessment, the pharmaceutical company submitted the pivotal, uncontrolled phase II LITESPARK 004 study and a descriptive comparison with the retrospective, non-interventional Von-Hippel-Lindau Natural History study.

Overall, the data presented are unsuitable to demonstrate an additional benefit of belzutifan compared with the appropriate comparator therapy, which is why an additional benefit of belzutifan is not proven for the treatment of adults with von Hippel-Lindau disease-associated renal cell carcinoma (RCC), central nervous system (CNS) haemangioblastomas, or pancreatic neuroendocrine tumours (pNET), for whom localised procedures are unsuitable and who require therapy.

2.2 Number of patients or demarcation of patient groups eligible for treatment

The information on the number of patients is based on the target population in statutory health insurance (SHI).

The G-BA base their resolution on the patient numbers from the dossier submitted by the pharmaceutical company. The pharmaceutical company's approach is largely comprehensible in mathematical terms, but underestimated in the lower limit and subject to uncertainty in the upper limit.

The main reasons for this are the relatively old prevalence data and uncertainties regarding the completeness of the collected cases and the basic population. In addition, the transfer of incidence-based percentage values to a prevalent baseline population in the lower limits and the operationalisation of the patient group that requires therapy and is unsuitable for local therapies is fraught with uncertainty.

2.3 Requirements for a quality-assured application

The requirements in the product information are to be taken into account. The European Medicines Agency (EMA) provides the contents of the product information (summary of product characteristics, SmPC) for Welireg (active ingredient: belzutifan) at the following publicly accessible link (last access: 25 June 2025):

https://www.ema.europa.eu/en/documents/product-information/welireg-epar-product-information_en.pdf

Treatment with belzutifan should only be initiated and monitored

- by specialists in internal medicine and haematology and oncology as well as specialists in internal medicine and nephrology who are experienced in the treatment of patients with renal cell carcinoma, and
- by specialists in internal medicine and haematology and oncology who are experienced in the treatment of patients with central nervous system haemangioblastomas, as well as specialists in neurology and neurosurgery, and

- by specialists in internal medicine and haematology and oncology experienced in the treatment of patients with pancreatic neuroendocrine tumours, as well as specialists in internal medicine and gastroenterology, and

other doctors from other specialist groups participating in the oncology agreement.

This medicinal product received a conditional marketing authorisation. This means that further evidence of the benefit of the medicinal product is anticipated. The European Medicines Agency EMA will evaluate new information on this medicinal product at a minimum once per year and update the product information where necessary.

In accordance with the EMA requirements regarding additional risk minimisation measures, the pharmaceutical company must provide training material that contains information for medical professionals and patients (including patient card). The training material contains in particular information and warnings on the risk of embryo-foetal damage when taking belzutifan during pregnancy.

2.4 Treatment costs

The treatment costs are based on the contents of the product information and the information listed in the LAUER-TAXE® (last revised: 1 September 2025).

If no maximum treatment duration is specified in the product information, the treatment duration is assumed to be one year (365 days), even if the actual treatment duration varies from patient to patient and/or is shorter on average. The time unit "days" is used to calculate the "number of treatments/ patient/ year", time intervals between individual treatments and for the maximum treatment duration, if specified in the product information.

Treatment period:

Adults with von Hippel-Lindau disease-associated renal cell carcinoma (RCC), central nervous system (CNS) haemangioblastomas, or pancreatic neuroendocrine tumours (pNET), for whom localised procedures are unsuitable and who require therapy

Designation of the therapy	Treatment mode	Number of treatments/ patient/ year	Treatment duration/ treatment (days)	Treatment days/ patient/ year
Medicinal product to be assessed				
Belzutifan	Continuously, 1 x daily	365.0	1	365.0
Appropriate comparator therapy				
Monitoring wait-and-see approach	Not calculable			

Consumption:

For the cost representation, only the dosages of the general case are considered. Patient-individual dose adjustments (e.g. because of side effects or co-morbidities) are not taken into account when calculating the annual treatment costs.

Adults with von Hippel-Lindau disease-associated renal cell carcinoma (RCC), central nervous system (CNS) haemangioblastomas, or pancreatic neuroendocrine tumours (pNET), for whom localised procedures are unsuitable and who require therapy

Designation of the therapy	Dosage/ application	Dose/ patient/ treatment days	Consumption by potency/ treatment day	Treatment days/ patient/ year	Average annual consumption by potency
Medicinal product to be assessed					
Belzutifan	120 mg	120 mg	3 x 40 mg	365.0	1,095 x 40 mg
Appropriate comparator therapy					
Monitoring wait-and-see approach	Not calculable				

Costs:

In order to improve comparability, the costs of the medicinal products were approximated both on the basis of the pharmacy sales price level and also deducting the statutory rebates in accordance with Section 130 and Section 130a SGB V. To calculate the annual treatment costs, the required number of packs of a particular potency was first determined on the basis of consumption. Having determined the number of packs of a particular potency, the costs of the medicinal products were then calculated on the basis of the costs per pack after deduction of the statutory rebates. Any reference prices shown in the cost representation may not represent the cheapest available alternative.

Costs of the medicinal products:

Adults with von Hippel-Lindau disease-associated renal cell carcinoma (RCC), central nervous system (CNS) haemangioblastomas, or pancreatic neuroendocrine tumours (pNET), for whom localised procedures are unsuitable and who require therapy

Designation of the therapy	Packaging size	Costs (pharmacy sales price)	Rebate Section 130 SGB V	Rebate Section 130a SGB V	Costs after deduction of statutory rebates
Medicinal product to be assessed					
Belzutifan 40 mg	90 FCT	€ 17,830.31	€ 1.77	€ 1,015.00	€ 16,813.54
Appropriate comparator therapy					
Monitoring wait-and-see approach	Not calculable				
Abbreviations: FCT = film-coated tablets					

Costs for additionally required SHI services:

Only costs directly related to the use of the medicinal product are taken into account. If there are regular differences in the necessary use of medical treatment or in the prescription of other services in the use of the medicinal product to be evaluated and the appropriate comparator therapy in accordance with the product information, the costs incurred for this must be taken into account as costs for additionally required SHI services.

Medical treatment costs, medical fee services, and costs incurred for routine examinations (e.g. regular laboratory services such as blood count tests) that do not exceed the standard expenditure in the course of the treatment are not shown.

Because there are no regular differences in the necessary use of medical treatment or in the prescription of other services in the use of the medicinal product to be evaluated and the appropriate comparator therapy in accordance with the product information, no costs for additionally required SHI services had to be taken into account.

2.5 Designation of medicinal products with new active ingredients according to Section 35a, paragraph 3, sentence 4 SGB V that can be used in a combination therapy with the assessed medicinal product

According to Section 35a, paragraph 3, sentence 4, the G-BA designate all medicinal products with new active ingredients that can be used in a combination therapy with the assessed medicinal product for the therapeutic indication to be assessed on the basis of the marketing authorisation under Medicinal Products Act.

Basic principles of the assessed medicinal product

A designation in accordance with Section 35a, paragraph 3, sentence 4 SGB V requires that it is examined based on the product information for the assessed medicinal product whether it can be used in a combination therapy with other medicinal products in the assessed therapeutic indication. In the first step, the examination is carried out on the basis of all sections of the currently valid product information for the assessed medicinal product.

If the assessed medicinal product contains an active ingredient or a fixed combination of active ingredients in the therapeutic indication of the resolution (assessed therapeutic indication) and is approved exclusively for use in monotherapy, a combination therapy is not considered due to the marketing authorisation under Medicinal Products Act, which is why no designation is made.

A designation is also not considered if the G-BA have decided on an exemption as a reserve antibiotic for the assessed medicinal product in accordance with Section 35a, paragraph 1c, sentence 1 SGB V. The additional benefit is deemed to be proven if the G-BA have decided on an exemption for a reserve antibiotic in accordance with Section 35a, paragraph 1c, sentence 1 SGB V; the extent of the additional benefit and its therapeutic significance are not to be assessed by the G-BA. Due to the lack of an assessment mandate by the G-BA following the resolution on an exemption according to Section 35a, paragraph 1c, sentence 1 SGB V with regard to the extent of the additional benefit and the therapeutic significance of the reserve antibiotic to be assessed, there is a limitation due to the procedural privileging of the pharmaceutical companies to the effect that neither the proof of an existing nor an expected at least considerable additional benefit is possible for exempted reserve antibiotics in the procedures according to Section 35a paragraph 1 or 6 SGB V and Section 35a paragraph 1d

SGB V. The procedural privileging of the reserve antibiotics exempted according to Section 35a, paragraph 1c, sentence 1 SGB V must therefore also be taken into account at the level of designation according to Section 35a, paragraph 3, sentence 4 SGB V in order to avoid valuation contradictions.

With regard to the further examination steps, a differentiation is made between a "determined" or "undetermined" combination, which may also be the basis for a designation.

A "determined combination" exists if one or more individual active ingredients which can be used in combination with the assessed medicinal product in the assessed therapeutic indication are specifically named.

An "undetermined combination" exists if there is information on a combination therapy, but no specific active ingredients are named. An undetermined combination may be present if the information on a combination therapy:

- names a product class or group from which some active ingredients not specified in detail can be used in combination therapy with the assessed medicinal product, or
- does not name any active ingredients, product classes or groups, but the assessed medicinal product is used in addition to a therapeutic indication described in more detail in the relevant product information, which, however, does not include information on active ingredients within the scope of this therapeutic indication.

Concomitant active ingredient

The concomitant active ingredient is a medicinal product with new active ingredients that can be used in combination therapy with the assessed medicinal product for the therapeutic indication to be assessed.

For a medicinal product to be considered as a concomitant active ingredient, it must be classified as a medicinal product with new active ingredients according to Section 2 paragraph 1 Ordinance on the Benefit Assessment of Pharmaceuticals (AM-NutzenV) in conjunction with the corresponding regulations in Chapter 5 of the Rules of Procedure of the G-BA as of the date of the present resolution. In addition, the medicinal product must be approved in the assessed therapeutic indication, whereby a marketing authorisation is sufficient only for a sub-area of the assessed therapeutic indication.

Based on an "undetermined combination", the concomitant active ingredient must be attributable to the information on the product class or group or the therapeutic indication according to the product information of the assessed medicinal product in the assessed therapeutic indication, whereby the definition of a product class or group is based on the corresponding requirements in the product information of the assessed medicinal product.

In addition, there must be no reasons for exclusion of the concomitant active ingredient from a combination therapy with the assessed medicinal product, in particular no exclusive marketing authorisation as monotherapy.

In addition, all sections of the currently valid product information of the eligible concomitant active ingredient are checked to see whether there is any information that excludes its use in combination therapy with the assessed medicinal product in the assessed therapeutic indication under marketing authorisation regulations. Corresponding information can be, for example, dosage information or warnings. In the event that the medicinal product is used as part of a determined or undetermined combination which does not include the assessed medicinal product, a combination with the assessed medicinal product shall be excluded.

Furthermore, the product information of the assessed medicinal product must not contain

any specific information that excludes its use in combination therapy with the eligible concomitant active ingredient in the assessed therapeutic indication under marketing authorisation regulations.

Medicinal products with new active ingredients for which the G-BA have decided on an exemption as a reserve antibiotic in accordance with Section 35a, paragraph 1c, sentence 1 SGB V are ineligible as concomitant active ingredients. The procedural privileging of the reserve antibiotics exempted according to Section 35a, paragraph 1c, sentence 1 SGB V also applies accordingly to the medicinal product eligible as a concomitant active ingredient.

Designation

The medicinal products which have been determined as concomitant active ingredients in accordance with the above points of examination are named by indicating the relevant active ingredient and the invented name. The designation may include several active ingredients, provided that several medicinal products with new active ingredients may be used in the same combination therapy with the assessed medicinal product or different combinations with different medicinal products with new active ingredients form the basis of the designation.

If the present resolution on the assessed medicinal product in the assessed therapeutic indication contains several patient groups, the designation of concomitant active ingredients shall be made separately for each of the patient groups.

Exception to the designation

The designation excludes combination therapies for which - patient group-related - a considerable or major additional benefit has been determined by resolution according to Section 35a, paragraph 3, sentence 1 SGB V or it has been determined according to Section 35a, paragraph 1d, sentence 1 SGB V that at least considerable additional benefit of the combination can be expected. In this context, the combination therapy that is excluded from the designation must, as a rule, be identical to the combination therapy on which the preceding findings were based.

In the case of designations based on undetermined combinations, only those concomitant active ingredients - based on a resolution according to Section 35a, paragraph 3, sentence 1 SGB V on the assessed medicinal product in which a considerable or major additional benefit had been determined - which were approved at the time of this resolution are excluded from the designation.

Legal effects of the designation

The designation of combinations is carried out in accordance with the legal requirements according to Section 35a, paragraph 3, sentence 4 and is used exclusively to implement the combination discount according to Section 130e SGB V between health insurance funds and pharmaceutical companies. The designation is not associated with a statement as to the extent to which a therapy with the assessed medicinal products in combination with the designated medicinal products corresponds to the generally recognised state of medical knowledge. The examination was carried out exclusively on the basis of the possibility under Medicinal Products Act to use the medicinal products in combination therapy in the assessed therapeutic indication based on the product information; the generally recognised state of medical knowledge or the use of the medicinal products in the reality of care were not the subject of the examination due to the lack of an assessment mandate of the G-BA within the framework of Section 35a, paragraph 3, sentence 4 SGB V.

The findings made neither restrict the scope of treatment required to fulfil the medical

treatment mandate, nor do they make statements about expediency or economic feasibility.

Justification for the findings on designation in the present resolution:

Adults with von Hippel-Lindau disease-associated renal cell carcinoma (RCC), central nervous system (CNS) haemangioblastomas, or pancreatic neuroendocrine tumours (pNET), for whom localised procedures are unsuitable and who require therapy

No medicinal product with new active ingredients that can be used in a combination therapy that fulfils the requirements of Section 35a, paragraph 3, sentence 4 SGB V.

2.6 Percentage of study participants at study sites within the scope of SGB V in accordance with Section 35a, paragraph 3, sentence 5 SGB V

The medicinal product Welireg is a medicinal product placed on the market from 1 January 2025. In accordance with Section 35a, paragraph 3, sentence 5 SGB V, the G-BA must determine whether a relevant percentage of the clinical studies on the medicinal product were conducted within the scope of SGB V. This is the case if the percentage of study participants who have participated in the clinical studies on the medicinal product to be assessed in the therapeutic indication to be assessed at study sites within the scope of SGB V is at least five per cent of the total number of study participants.

The calculation is based on all studies that were submitted as part of the benefit assessment dossier in the therapeutic indication to be assessed in accordance with Section 35a, paragraph 1, sentence 3 SGB V in conjunction with Section 4, paragraph 6 AM-NutzenV. Approval studies include all studies submitted to the regulatory authority in the authorisation dossier for the assessment of the clinical efficacy and safety of the medicinal product in the therapeutic indication to be assessed.

The percentage of study participants in the clinical studies of the medicinal product conducted or commissioned by the pharmaceutical company in the therapeutic indication to be assessed who participated at study sites within the scope of SGB V (German Social Security Code) is < 5 per cent (2.5%) of the total number of study participants.

The clinical studies of the medicinal product in the therapeutic indication to be assessed were therefore not conducted to a relevant extent within the scope of SGB V.

3. Bureaucratic costs calculation

The proposed resolution does not create any new or amended information obligations for care providers within the meaning of Annex II to Chapter 1 VerfO and, accordingly, no bureaucratic costs.

4. Process sequence

At their session on 23 April 2024, the Subcommittee on Medicinal Products determined the appropriate comparator therapy.

On 26 March 2025, the pharmaceutical company submitted a dossier for the benefit assessment of belzutifan to the G-BA in due time in accordance with Chapter 5 Section 8, paragraph 1, number 1, sentence 2 Verfo.

By letter dated 31 March 2025 in conjunction with the resolution of the G-BA of 1 August 2011 concerning the commissioning of the IQWiG to assess the benefit of medicinal products with new active ingredients in accordance with Section 35a SGB V, the G-BA commissioned the IQWiG to assess the dossier concerning the active ingredient belzutifan.

The dossier assessment by the IQWiG was submitted to the G-BA on 27 June 2025, and the written statement procedure was initiated with publication on the G-BA website on 1 July 2025. The deadline for submitting statements was 22 July 2025.

The oral hearing was held on 11 August 2025.

In order to prepare a recommendation for a resolution, the Subcommittee on Medicinal Products commissioned a working group (Section 35a) consisting of the members nominated by the leading organisations of the care providers, the members nominated by the SHI umbrella organisation, and representatives of the patient organisations. Representatives of the IQWiG also participate in the sessions.

The evaluation of the written statements received and the oral hearing was discussed at the session of the Subcommittee on 9 September 2025, and the proposed draft resolution was approved.

At their session on 18 September 2025, the plenum adopted a resolution to amend the Pharmaceuticals Directive.

Chronological course of consultation

Session	Date	Subject of consultation
Subcommittee on Medicinal Products	23 April 2024	Determination of the appropriate comparator therapy
Working group Section 35a	6 August 2025	Information on written statements received; preparation of the oral hearing
Subcommittee on Medicinal Products	11 July 2025	Conduct of the oral hearing
Working group Section 35a	20.08.2025; 03.09.2025	Consultation on the dossier evaluation by the IQWiG and evaluation of the written statement procedure
Subcommittee on Medicinal Products	9 September 2025	Concluding discussion of the draft resolution
Plenum	18 September 2025	Adoption of the resolution on the amendment of the Pharmaceuticals Directive

Berlin, 18 September 2025

Federal Joint Committee (G-BA)
in accordance with Section 91 SGB V
The Chair

Prof. Hecken