Gemeinsamer Bundesausschuss

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
Letermovir (new therapeutic indication: CMV disease, prophylaxis after kidney transplant, < 18 years, ≥ 40 kg)

of 6 November 2025

Contents

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,

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 active ingredient letermovir (Prevymis) was listed for the first time on 15 February 2018 in the "LAUER-TAXE®", the extensive German registry of available drugs and their prices.

Prevymis (letermovir) is approved as a medicinal product for the treatment of rare diseases under Regulation (EC) No. 141/2000 of the European Parliament and of the Council of 16 December 1999.

Within the previously approved therapeutic indications, the sales volume of letermovir with the statutory health insurance at pharmacy sales prices, including value-added tax exceeded € 30 million. Evidence must therefore be provided for letermovir in accordance with Section 5, paragraph 1 through 6 VerfO, and the additional benefit compared with the appropriate comparator therapy must be demonstrated.

On 25 April 2025, letermovir received marketing authorisation for a new therapeutic indication to be classified as a major type 2 variation as defined according to Annex 2, number

2, letter a to Regulation (EC) No. 1234/2008 of the Commission of 24 November 2008 concerning the examination of variations to the terms of marketing authorisations for medicinal products for human use and veterinary medicinal products (OJ L 334, 12.12.2008, sentence 7).

On 14 May 2025, i.e. at the latest within four weeks after informing the pharmaceutical company about the approval for a new therapeutic indication, the pharmaceutical company have submitted a dossier in due time in accordance with Section 4, paragraph 3, number 2 Ordinance on the Benefit Assessment of Pharmaceuticals (AM-NutzenV) in conjunction with Chapter 5 Section 8, paragraph 1, number 2 of the Rules of Procedure (VerfO) of the G-BA on the active ingredient letermovir with the new therapeutic indication

"PREVYMIS is indicated for prophylaxis of CMV disease in CMV-seronegative paediatric patients weighing at least 40 kg who have received a kidney transplant from a CMV-seropositive donor [D+/R-]"

.

The G-BA commissioned the IQWiG to carry out the assessment of the dossier. The benefit assessment was published on 15 August 2025 on the G-BA website (www.g-ba.de), therefore initiating the written statement procedure. In addition, an oral hearing was held.

Based on 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, the G-BA decided on the question on whether an additional benefit of letermovir compared with the appropriate comparator therapy could be determined – Annex XII - Resolutions on the benefit assessment of medicinal products with new active ingredients according to Section 35a SGB V. 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 IQWiG according to the General Methods was not used in the benefit assessment of letermovir – Annex XII - Resolutions on the benefit assessment of medicinal products with new active ingredients according to Section 35a SGB V.

In the light of the above, and taking into account the statements received and the oral hearing, the G-BA has 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 Letermovir (Prevymis) in accordance with the product information

PREVYMIS is indicated for prophylaxis of CMV disease in CMV-seronegative adult and paediatric patients weighing at least 40 kg who have received a kidney transplant from a CMV-seropositive donor [D+/R-].

Therapeutic indication of the resolution (resolution of 6 November 2025):

PREVYMIS is indicated for prophylaxis of CMV disease in CMV-seronegative paediatric patients weighing at least 40 kg who have received a kidney transplant from a CMV-seropositive donor [D+/R-].

2.1.2 Appropriate comparator therapy

The appropriate comparator therapy was determined as follows:

CMV-seronegative recipients [R-] of a kidney transplant from CMV-seropositive donors [D+] aged 0 to < 18 years weighing at least 40 kg for whom prophylaxis of cytomegalovirus (CMV) disease is indicated

Appropriate comparator therapy for letermovir:

- Ganciclovir or valganciclovir

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 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. In addition to letermovir, the active ingredients ganciclovir (in patients with drug-induced immunosuppression (e.g. after organ transplant or chemotherapy for cancer)), valganciclovir (in CMV-negative adults and children who have received an organ transplant from a CMV-positive donor) and human cytomegalovirus immunoglobulin (in patients undergoing immunosuppressive therapy, in particular transplant recipients) are approved for the prophylaxis of cytomegalovirus disease in children and adolescents. Valaciclovir is approved for adolescents who have received an organ transplant. In addition, the active ingredient foscarnet is approved for the treatment of cytomegalovirus infection in children and adolescents in the therapeutic indication, but not for prophylaxis.

On 2. In the present therapeutic indication, no non-medicinal measures are considered.

On 3. There are no resolutions on the prophylaxis of CMV disease in children and adolescents who have received a kidney transplant. A resolution on the benefit assessment of new medicinal products according to Section 35a SGB V for the active ingredient letermovir in the indication "Prophylaxis of cytomegalovirus (CMV) disease in CMV-seronegative adults who have received a kidney transplant from a CMV-seropositive donor [D+/R-]" of 6 June 2024 is available.

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 indication according to Section 35a paragraph 7 SGB V (see “Information on Appropriate Comparator Therapy”).

As part of the evidence search, the S2k guideline of the Society of Virology (GfV) and the German Association for the Control of Viral Diseases (DVV) on "viral infections in organ and allogeneic stem cell transplant recipients: diagnostics, prevention and therapy", which was updated in August 2024, was identified.

It is assumed that the present therapeutic indication aims at preventive therapy and not pre-emptive therapy.

The guideline recommended carrying out prophylaxis after a kidney transplant in high-risk constellations, i.e. in CMV-seronegative recipients and CMV-seropositive donors [D+/R-]. The approved active ingredients ganciclovir and valganciclovir are primarily recommended as medicinal therapy options for prophylaxis, although it is possible to switch between the two active ingredients at any time. The recommendations do not differentiate between adult and paediatric patients; a dose adjustment may be

necessary in children and adolescents. Both active ingredients are considered equally appropriate in the present indication.

According to the guideline, the active ingredient valaciclovir that is also approved in the present indication for adolescents is inferior to the use of ganciclovir and valganciclovir in terms of long-term renal function. CMV-specific immunoglobulins are approved for the prophylaxis of CMV infection in patients undergoing immunosuppressive therapy, but are not recommended in the guideline. Valaciclovir and CMV-specific immunoglobulins are therefore not designated as the appropriate comparator therapy.

In the overall assessment of the available evidence, prophylaxis with ganciclovir or valganciclovir is determined as the appropriate comparator therapy for CMV-seronegative children and adolescents weighing at least 40 kg who have received a kidney transplant from a CMV-seropositive donor. The appropriate comparator therapy determined here includes several therapy options. These therapeutic alternatives are equally appropriate for the comparator therapy. The additional benefit can be demonstrated compared to one of the therapeutic alternatives mentioned.

It is assumed that pre-emptive therapy will be initiated upon occurrence of a CMV infection.

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 letermovir is assessed as follows:

<u>CMV-seronegative recipients [R-] of a kidney transplant from CMV-seropositive donors [D+] aged 0 to < 18 years weighing at least 40 kg for whom prophylaxis of cytomegalovirus (CMV) disease is indicated:</u>

An additional benefit is not proven.

Justification:

In their dossier, the pharmaceutical company did not present any data for the assessment of the additional benefit of letermovir compared with the appropriate comparator therapy. There are therefore no data available for assessment of the additional benefit of letermovir for the prophylaxis of CMV disease in CMV-seronegative paediatric patients weighing at least 40 kg who have received a kidney transplant from a CMV-seropositive donor. An additional benefit is therefore not proven.

2.1.4 Summary of the assessment

The present assessment is the benefit assessment of a new therapeutic indication for the active ingredient letermovir.

The therapeutic indication assessed here relates to the patient population of children and adolescents aged 0 to < 18 years and is as follows: "for prophylaxis of CMV disease in CMV-

seronegative paediatric patients weighing at least 40 kg who have received a kidney transplant from a CMV-seropositive donor [D+/R-]".

The active ingredients ganciclovir or valganciclovir were determined as the appropriate comparator therapy.

The pharmaceutical company did not present any data to prove the additional benefit of letermovir compared to the appropriate comparator therapy. Thus, the additional benefit of letermovir for prophylaxis of CMV disease in CMV-seronegative paediatric patients weighing at least 40 kg who have received a kidney transplant from a CMV-seropositive donor is not proven.

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 resolution is based on information provided by the pharmaceutical company in the dossier on the benefit assessment. The estimate is plausible in its order of magnitude.

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 Prevymis (active ingredient: letermovir) at the following publicly accessible link (last access: 22 September 2025):

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

Treatment with letermovir should only be initiated and monitored by doctors experienced in treating patients who have received an allogeneic haematopoietic stem cell transplant or kidney transplant.

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). The calculation of treatment costs is generally based on the last revised LAUER-TAXE® version following the publication of the benefit assessment.

According to the product information, the recommended dosage of letermovir in the present therapeutic indication is 480 mg once daily. In the case of concomitant use of ciclosporin, the dose must be adjusted to 240 mg once daily. According to evaluations of the CERTAIN registry, in which German study sites are also involved, the percentage of paediatric patients with ciclosporin treatment in the first year after a kidney transplant was 37-53.5%[1], and therefore dose adjustment was taken into account in the cost calculation.

Treatment can be started on the day of the kidney transplantation and can be continued no later than 7 days post-transplantation and for a period of 200 days post-transplantation.

[1] Dossier for the benefit assessment module 3

For dosages depending on body weight (BW) or body surface area (BSA), the average body measurements from the official representative statistics "Microcensus 2017 – body measurements of the population"[2] and "Microcensus 2021 – body measurements of the population"[3] were used as a basis.

For children aged 11 to under 12 years, the official representative statistics for the cost calculation result in an average body weight of 42.1 kg and body height of 150 cm. For adolescents aged 17 years, the average body weight of 67.2 kg and body height of 172 cm are used as the basis for cost calculation.

According to the product information, the recommended dose of valganciclovir for patients aged 16 years and over is 900 mg once daily and for patients under 16 years, it is mg = 7 x BSA x ClcrS once daily, but not more than 900 mg. Treatment should be started within 10 days of transplantation. The use of valganciclovir should be continued in children and adolescents for 200 days post-transplantation. The CrCLS is different from patient to patient and the serum creatinine value to be taken into account does not correspond to the normal values in kidney transplant patients, which is why a patient-individual consumption is used for the lower limit of valganciclovir.

For patients aged 16 years and over, treatment with ganciclovir is recommended in accordance with the product information at either 5 mg/kg once daily for 7 days a week or 6 mg/kg once daily for 5 days a week. The dose for children and adolescents must be determined on a patient-individual basis (3 × BSA × CrCLS). According to the product information, the reconstituted solution should be used immediately from a microbiological point of view. As the dosage is different from patient to patient, the minimum consumption is one vial per treatment day. The duration of maintenance treatment depends on the risk of CMV disease according to the product information and it should be referred to local treatment guidelines. According to the S2k guideline "viral infections in organ and allogeneic stem cell transplant recipients: diagnosis, prevention and therapy"[4], treatment with ganciclovir or valganciclovir is recommended as prophylaxis. It is also possible to switch between the two active ingredients at any time. Since the duration of use of ganciclovir can be different from patient to patient, the duration of valganciclovir use is shown analogously for the cost representation.

[2] Federal Health Reporting. Average body measurements of the population (2017, both sexes, 1 year and older), www.gbe-bund.de

[3] Federal Health Reporting. Average body measurements of the population (2021, both sexes, 15 years and older), www.gbe-bund.de

[4] https://register.awmf.org/assets/guidelines/093-002l_S2k_Virusinfektionen-Organtransplantierte-alloge-Stammzell-Transplantierten-Diagnostik-Praevention-Therapie__2024-12.pdf

CMV-seronegative recipients [R-] of a kidney transplant from CMV-seropositive donors [D+] aged 0 to < 18 years weighing at least 40 kg for whom prophylaxis of cytomegalovirus (CMV) disease is indicated

Treatment period:

Designation of the therapy	Treatment mode	Number of treatments/ patient/ year	Treatment duration/ treatment (days)	Treatment days/ patient/ year
Medicinal product to be assessed				
Letermovir	Continuously, 1 x daily	194 – 201	1	194 – 201
Appropriate comparator therapy				
Ganciclovir or valganciclovir				
Ganciclovir	Continuously, 1 x daily	137 – 201	1	137 – 201
Valganciclovir	Continuously, 1 x daily	191 – 201	1	191 – 201

Consumption:

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					
Letermovir	240 mg[5] – 480 mg	240 mg – 480 mg	1 x 240 mg – 1 x 480 mg	194 - 201	194 x 240 mg – 201 x 480 mg
Appropriate comparator therapy					
Ganciclovir or valganciclovir					
Ganciclovir	< 16 years: mg = 3 x BSA x CrCLS > 16 years 5 - 6 mg/kg 336 mg - 403.2 mg	Different from patient to patient	1 x 500 mg[6]	137 - 201	137 - 201 x 500 mg
Valganciclovir	< 16 years: 7 x BSA x ClcrS	Different from patient to patient		191 - 201	Different from patient to patient
	> 16 years 900 mg	900 mg	2 x 450 mg	191 - 201	382 x 450 mg – 402 x 450 mg

[5] In combination with ciclosporin

[6] According to the product information, the reconstituted solution should be used immediately from a microbiological point of view. As the dosage is different from patient to patient, the minimum consumption is one vial per treatment day.

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:

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					
Letermovir 240 mg	28 FCT	€ 5,089.45	€ 1.77	€ 287.37	€ 4,800.31
Letermovir 480 mg	28 FCT	€ 10,121.26	€ 1.77	€ 574.74	€ 9,544.75
Appropriate comparator therapy					
Ganciclovir 500 mg	5 PIC	€ 305.27	€ 1.77	€ 13.95	€ 289.55
Valganciclovir 450 mg	60 FCT	€ 517.04	€ 1.77	€ 24.00	€ 491.27
Valganciclovir 450 mg	30 FCT	€ 453.83	€ 1.77	€ 21.00	€ 431.06
Abbreviations: FCT = film-coated tablets, PIC = powder for the preparation of an infusion solution concentrate					

LAUER-TAXE® last revised: 1 September 2025

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.

Other SHI services:

The special agreement on contractual unit costs of retail pharmacist services (Hilfstaxe) (Sections 4 and 5 of the Pharmaceutical Price Ordinance) from 1 October 2009 is not fully used to calculate costs. Alternatively, the pharmacy sales price publicly accessible in the directory services according to Section 131 paragraph 4 SGB V is a suitable basis for a standardised calculation.

According to the Hilfstaxe in its currently valid version, surcharges for the production of infusion solutions containing antibiotics and virustatics amount to a maximum of € 39 per ready-to-apply unit. These additional other costs are not added to the pharmacy sales price but rather follow the rules for calculating in the Hilfstaxe. The cost representation is based on the pharmacy retail price and the maximum surcharge for the preparation and is only an approximation of the treatment costs. This presentation does not take into account, for example, the rebates on the pharmacy purchase price of the active ingredient, the invoicing of discards, the calculation of application containers, and carrier solutions in accordance with the regulations in Annex 3 of the Hilfstaxe.

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:

CMV-seronegative recipients [R-] of a kidney transplant from CMV-seropositive donors [D+] aged 0 to < 18 years weighing at least 40 kg for whom prophylaxis of cytomegalovirus (CMV) disease is indicated

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.
References:

Product information for letermovir (Prevymis); PREVYMIS® 240 mg/ 480 mg concentrate for solution for infusion; last revised: April 2025

Product information for letermovir (Prevymis); PREVYMIS® 240 mg/ 480 mg film-coated tablets; last revised: April 2025

Product information for letermovir (Prevymis); PREVYMIS ® granules in sachet. Last revised: April 2025

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 12 March 2024, the Subcommittee on Medicinal Products determined the appropriate comparator therapy.

On 14 May 2025, the pharmaceutical company submitted a dossier for the benefit assessment of letermovir to the G-BA in due time in accordance with Chapter 5 Section 8, paragraph 1, number 2 VerfO.

By letter dated 15 May 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 letermovir.

The dossier assessment by the IQWiG was submitted to the G-BA on 6 August 2025, and the written statement procedure was initiated with publication on the G-BA website on 15 August 2025. The deadline for submitting statements was 5 September 2025.

The oral hearing was held on 22 September 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 28 October 2025, and the proposed draft resolution was approved.

At their session on 6 November 2025, the plenum adopted a resolution to amend the Pharmaceuticals Directive.

Chronological course of consultation

Session	Date	Subject of consultation
Subcommittee on Medicinal Products	12 March 2024	Determination of the appropriate comparator therapy
Working group Section 35a	16 September 2025	Information on written statements received; preparation of the oral hearing
Subcommittee on Medicinal Products	22 September 2025	Conduct of the oral hearing
Working group Section 35a	30 September 2025 14 October 2025	Consultation on the dossier evaluation by the IQWiG and evaluation of the written statement procedure
Subcommittee on Medicinal Products	28 October 2025	Concluding discussion of the draft resolution
Plenum	6 November 2025	Adoption of the resolution on the amendment of the Pharmaceuticals Directive

Berlin, 6 November 2025

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

Prof. Hecken