



Ordinance No. 433-B/2026/1: first special public-availability scheme under the new SiNATS

Ordinance No. 433-B/2026/1 was published on 21 September, establishing the special public-availability scheme for the health technologies needed to treat patients with ichthyosis and epidermolysis bullosa.

The Ordinance is of particular significance as it is the first special public-availability scheme published after Decree-Law No. 118/2026, of 17 June, which revised the National System for the Assessment of Health Technologies (SiNATS).

Besides these special schemes, this legal instrument also provides for further general regulation – namely on the administrative procedures for public availability and on price setting and revision – which has not yet been published.

The new scheme enters into force 90 days after the Ordinance's publication, that is, on 20 December 2026.

Material scope and dispensing channel

The scheme covers the health technologies identified in the Ordinance's four annexes, distinguishing between the condition covered and the place of dispensing – community pharmacy or an NHS healthcare unit.

It may also cover prescription medicines with a therapeutic indication for either of the two conditions, provided there is a favourable decision on public availability.

Conditions for access, funding and prescribing

Public availability is conditional on the health technologies being intended for NHS beneficiaries diagnosed with ichthyosis or epidermolysis bullosa. Prescribing of the health technologies covered is reserved to medical specialists in Dermatology within NHS healthcare units.

For medicines dispensed in community pharmacies, the medicines covered are reimbursed by the State at Tier A. The co-payment is calculated on the price of the medicine or where the medicine belongs to a homogeneous group, on the corresponding reference price, and corresponds to 90% of the price.

As for the technologies dispensed at NHS healthcare units, these are made available at no cost to the patient, with financial responsibility falling on the healthcare unit where they are prescribed.

Updating the technologies covered

One of the scheme's key features is that its content can be updated without amending the Ordinance. The addition of new health technologies following a positive public-availability decision, as well as the removal of technologies already covered, will be carried out by resolution of INFARMED, I.P.'s Governing Board, published on the entity's website.

The scheme thus combines an initial regulatory definition of the access conditions with the possibility of updating the list of technologies through acts of INFARMED.

For any further clarification, please contact MFA's Life Sciences and IP Litigation team

