

Reference: FOI.ICB-2526/360

Subject: Medical Retina (Anti-VEGF) drugs

I can confirm that the ICB does hold some of the information requested; please see responses below:

QUESTION	RESPONSE
<p>I am requesting information regarding the financial flows and contractual arrangements between the ICB and it's commissioned NHS Trusts for the provision of medical retina services, specifically concerning anti-VEGF (Vascular Endothelial Growth Factor) medicines.</p> <p>Appendix A: Medical Retina Drugs Covered by this Request</p> <p>Please include data for the following agents in your response: Alfibercept, Ranibizumab, Faricimab, Bevacizumab, Brolucizumab.</p>	
<p>Contractual Structure</p> <p>1. Are anti-VEGF drug costs currently reimbursed to the Trust via:</p> <ul style="list-style-type: none"> • A pass-through mechanism (cost-and volume)? • A fixed block contract (inclusive of drug spend)? • An Aligned Incentive Contract (AIC) or "Blended Payment" model? <p>If a blended/AIC model is used, what is the specific split between the fixed element and the variable (volume-based) element for high-cost anti-VEGF drugs?</p>	<p>All anti-VEGF drug costs are reimbursed via a pass-through mechanism</p>

<p>2. Efficiency and Savings Incentives</p> <p>a. Is there a formal Gain-Share Agreement in place between the ICB and the Trust regarding the use of biosimilar anti-VEGF agents?</p> <p>If yes, what percentage of the saving is retained by the Trust vs. the ICB, is there a cap on total savings a provider can retain, and is the gainshare for new patients only?</p>	<p>No, there is not a formal gain share agreement in place.</p>
<p>3. Funding flows in 2026/27</p> <p>a. Are announced ICB arrangements for merger/cluster/split from April 2026 changing the anti-VEGF funding contractual structure and/or gain-share agreement with the Trust, and if so how?</p> <p>b. What is the NHSE-recommended reference price for anti-VEGF drugs in your region, and is the ICB implementing this reference price with the Trust from April 2026?</p>	<p>a. No information available.</p> <p>b. Reference price is commercial in confidence therefore unable to share. Please contact NHS England NHS England » Freedom of Information Act and Environmental Information Regulations</p> <p>BNSSG ICB do not have plans to implement this reference price from April 2026.</p> <p>The ICB has applied Section 43(2) to the recommended reference price for anti VEGF drugs in the region. Section 43(2) exempts from disclosure information which would, or would be likely to, prejudice the commercial interests of any legal person (an individual, a company, the public authority itself, or any other legal entity). Section 43(2) is a qualified exemption and therefore subject to the public interest test.</p> <p>The ICB considers that disclosure of the information would prejudice the commercial interests of both the ICB and NHS England. The ICB have contacted NHS England who have confirmed that the reference</p>

price is commercially sensitive information. The ICB has considered the response from NHS England as part of the public interest test.

The public interest argument in favour of disclosing the information include the NHS responsibility to be transparent and accountable in it's decision making processes. Both the ICB and NHS England have webpages outlining their responsibilities in terms of medicines management and optimisation.

The public interest argument in favour of maintaining the exemption includes the ICB responsibility to secure the best use of public resources and provide value for money. There are robust mechanisms to ensure the NHS obtains competitive prices for medicines whilst ensuring that the UK remains a commercially attractive marketplace for pharmaceutical companies. This supports patients to have a range of medicines to choose from. The ICB has also considered the response from NHS England confirming that the price is considered commercially sensitive.

The ICB has also considered that the information is likely commercially sensitive to the pharmaceutical companies working with NHS England. Disclosing commercially sensitive information may make those companies less likely to engage with the NHS if they perceive that doing so will create a competitive disadvantage.

The ICB has considered the balance of both disclosing the information and maintaining the exemption and believes that it is in

	the public's best interest to apply the exemption. By withholding commercially sensitive information, the ICB is supporting a competitive marketplace for medicines to ensure that patients have the widest range of medicines available to them.
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The information provided in this response is accurate as of 10 February 2026 and has been approved for release by Dr Joanne Medhurst, Chief Medical Officer for NHS Bristol, North Somerset and South Gloucestershire ICB.