

April 6, 2023

Robert G. Kramer, Sr.  
President and Chief Executive Officer  
Emergent BioSolutions  
400 Professional Drive, Suite 400  
Gaithersburg, Maryland 20879

Dear Mr. Kramer,

Last week, I was excited to see the U.S. Food and Drug Administration (FDA) grant approval for your company's over-the-counter (OTC) Narcan nasal spray.<sup>1</sup> This marks the first time ever that naloxone, a life-saving overdose antidote, is available to the public over-the-counter. Despite the FDA's decision to expand access to Narcan, another barrier looms large: cost. Unaffordable medicine is inaccessible medicine, whether it's offered by prescription or over-the-counter. As such, I urge Emergent BioSolutions to immediately reduce the list price of its OTC Narcan medication to a rate that makes it affordable for all individuals, particularly those who lack insurance coverage.

While Connecticut saw a decrease in opioid overdoses for the first time in years, overdose deaths remained above pre-pandemic levels in 2022, with a tragic 1,432 individuals losing their lives.<sup>2</sup> That's why I was pleased to see your statement confirming that Emergent BioSolutions is "dedicated to improving public health and assisting those working hard to end the opioid crisis," noting that you'll work to "continue increasing access and availability."<sup>3</sup> Notably absent from your statement was any discussion of cost. Currently, your product is reported as having a wholesale price as high as \$120 for two doses, with significant variation in price depending on location and insurance coverage.<sup>4</sup> Individuals without insurance

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<sup>1</sup> *FDA Approves First Over-the-Counter Naloxone Nasal Spray*, U.S. FOOD AND DRUG ADMINISTRATION (Mar. 29, 2023), <https://www.fda.gov/news-events/press-announcements/fda-approves-first-over-counter-naloxone-nasal-spray#:~:text=The%20application%20to%20approve%20Narcan,for%20marketing%20without%20a%20prescription.>

<sup>2</sup> *Drug Overdoses Monthly Report, January 2019-February 2023*, CONNECTICUT STATE DEPARTMENT OF PUBLIC HEALTH (Mar. 2023), [https://portal.ct.gov/-/media/DPH/Injury-Prevention/Opioid-Overdose-Data/Monthly-Death-Reports/2019-February-2023\\_Drug-Overdose-Deaths-Monthly-Report\\_Connecticut\\_updated-on-3-15-2023\\_Final.pdf](https://portal.ct.gov/-/media/DPH/Injury-Prevention/Opioid-Overdose-Data/Monthly-Death-Reports/2019-February-2023_Drug-Overdose-Deaths-Monthly-Report_Connecticut_updated-on-3-15-2023_Final.pdf).

<sup>3</sup> Jan Hoffman, *F.D.A. Approves Narcan for Over-the-Counter Sales*, THE NEW YORK TIMES (Mar. 29, 2023), [www.nytimes.com/2023/03/29/health/narcan-over-the-counter.html](http://www.nytimes.com/2023/03/29/health/narcan-over-the-counter.html).


<sup>4</sup> Bhanvi Satija, *US FDA approves over-the-counter sale of overdose reversal drug Narcan*, REUTERS (Mar. 29, 2023), <https://www.reuters.com/business/healthcare-pharmaceuticals/us-fda-approves-first-otc-opioid-overdose-reversal-drug-2023-03-29/>.

– about one fifth of people with opioid use disorder are uninsured<sup>5</sup> – will be forced to bear the full cost. Even individuals with insurance and low co-pays can struggle to afford Narcan. As Dr. Kimberly Sue, an addiction specialist in Connecticut, put it, “Some of my patients can’t afford co-pays of \$3 or \$5 for their medications, so we need to ensure that there’s multiple ways people can afford naloxone.”<sup>6</sup>

Public health experts share Dr. Sue’s concern that cost will continue to be a barrier to Narcan usage. As Nabarun Dasgupta, a scientist at the University of North Carolina’s Injury Prevention Research Center, put it, “We’re not going to be able to ramp up naloxone distribution in a game-changing way until we get a better handle on the price. There’s the promise on paper versus on the street, and it’s going to come down to the dollars and cents.”<sup>7</sup> Another expert stated, “For people who need it most, it needs to be at a lower price point than what it is currently available.”<sup>8</sup> Even FDA Commissioner Califf noted the cost of your product in FDA’s approval of OTC Narcan, stating that he encourages your company “to make accessibility to the product a priority by making it available as soon as possible and at an affordable price.”<sup>9</sup>

With FDA approval of your company’s OTC Narcan medication, you and Emergent BioSolutions have the opportunity to save an untold number of lives. You have the ability to keep families whole, protect the public, and help put an end to the scourge of opioid addiction. But this cannot be fully achieved unless OTC Narcan has a list price that makes it affordable to those who need it most. Therefore, I ask you to commit to work with public health experts, addiction specialists, and community activists to develop and determine a list price for OTC Narcan that makes it affordable and accessible for those who need it most. Please respond no later than April 20, 2023 with the affordable OTC Narcan list price that your company intends to set.

Sincerely,



Richard Blumenthal  
United States Senate

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<sup>5</sup> Kendal Orgera and Jennifer Tolbert, *Key Facts about Uninsured Adults with Opioid Use Disorder*, KAISER FAMILY FOUNDATION (July 15, 2019), <https://www.kff.org/uninsured/issue-brief/key-facts-about-uninsured-adults-with-opioid-use-disorder/#:~:text=Of%20the%20roughly%20two%20million,access%20to%20treatment%20and%20care..>

<sup>6</sup> Tim Harfmann, Early data shows decrease in deadly Connecticut drug overdoses, WTNH News8 (Mar. 21, 2023), <https://www.wtnh.com/news/connecticut/early-data-shows-decrease-in-deadly-connecticut-drug-overdoses/>.

<sup>7</sup> Nadia Kounang, Jen Christensen and Deidre McPhillips, *FDA approves first over-the-counter version of opioid overdose antidote Narcan*, CNN (Mar. 29, 2023), <https://www.cnn.com/2023/03/29/health/fda-narcan-otc-naloxone/index.html>.

<sup>8</sup> Bhanvi Satija, *US FDA approves over-the-counter sale of overdose reversal drug Narcan*, REUTERS (Mar. 29, 2023), <https://www.reuters.com/business/healthcare-pharmaceuticals/us-fda-approves-first-otc-opioid-overdose-reversal-drug-2023-03-29/>.

<sup>9</sup> *FDA Approves First Over-the-Counter Naloxone Nasal Spray*, U.S. FOOD AND DRUG ADMINISTRATION (Mar. 29, 2023), <https://www.fda.gov/news-events/press-announcements/fda-approves-first-over-counter-naloxone-nasal-spray#:~:text=The%20application%20to%20approve%20Narcan,for%20marketing%20without%20a%20prescription.>