

1 **VIEWPOINT**

2 **The Innovation-Remuneration Index (IRI). Making pharmaceutical companies report**
3 **what matters about innovation.**

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Word count: 1506

29 **Contributors and sources**

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31 was founder and director of the Centre for Human Drug Research in Leiden. He was among others,
32 editor in chief of the British Journal of Clinical Pharmacology, and vice-chairman of the Central Ethics
33 Committee and trial Competent Authority of the Netherlands. Rebecca Ultee and Glenn van
34 Veldhoven are students of Bio-Pharmaceutical Sciences at the Leiden University. Rebecca obtained
35 her Bachelor degree in 2020 while Glenn is in the process of obtaining this degree.

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Information was obtained from the websites of the companies and the register of The United States
Security and Exchange Commission.

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42 **Abstract**

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44 There is a lack of transparency about the cost of innovation of the pharmaceutical industry even
45 though these costs are claimed to be the major driver for high prices for medicines. This is reflected
46 by annual reports of the major pharmaceutical firms that contain a low number of pages on
47 innovation and its detailed costs, in comparison to pages about remuneration of executives where
48 the detail is excessive. The Innovation/Remuneration Index (IRI) provides an objective view of the
49 transparency priorities of a company and has the potential to shift this focus in favour of transparent
50 and detailed information on the cost of innovation.

51 The pharmaceutical industry elicits ambivalent responses from many sides. Pharmaceutical
52 innovation has been essential for much of the progress in medicine, especially in the last century.
53 However, it cannot be denied that the public response to the pharmaceutical industry is often
54 negative, largely driven by high drug prices and excessive marketing activities. The profits generated
55 by this activity have contributed to increased value of the companies for their shareholders and
56 investors, but less so to the public.¹ The increasing cost of medicines has been explained by high risks
57 and development costs spiralling upwards at much higher rates than inflation²³. The available
58 analyses of development costs were done by external consultants and academics and are never
59 based upon audited information and therefore subject to potential bias. This is reflected by a large
60 variation in the estimates from 3 billion to much less than 1 billion dollars⁴ per new medicine.
61 Additionally, the sample is not complete by any account as a recent study⁴ by an academic group
62 found only publicly available data on 18% of products. The highest estimate of about 2.6 billion²
63 came from a group that was criticised for its sponsored links to the pharmaceutical industry.
64 Currently, there are no audited figures available for the development costs other than at a very high
65 level of integration, reflected in the overall R&D spend of the publicly quote companies.

66 The situation is quite different for the remuneration of executives of these pharmaceutical
67 companies. There has also been much discussion about level of the remuneration of executives in all
68 areas, including the pharmaceutical industry, the non-profit sector and governments. This has led to
69 regulation requiring detailed reporting of executive compensation. In the US statutes only the
70 regulations for this consist of 31 pages⁵. Such detailed rules are absent for the reporting of
71 innovation costs. We studied the number of pages of reporting about executive remuneration in
72 relation to what companies report on innovation, in publicly available information for shareholders
73 and the general public.

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76 **Where is the emphasis of the annual report? Executive remuneration or innovation.**

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78 We used annual reports published on the website of the respective company or the 10-K form filed
79 with the United States Security and Exchange Commission (SEC) with possible additions such as the
80 14A or the 10-KA form considered if necessary. Annual reports and other financial information were
81 analysed according to a standard method (see supplementary information with this paper for details)
82 to ensure comparability.

83 For the executive remuneration, most of the information was gathered from the proxy statement
84 (schedule 14A complying with rule 14a-101 of the SEC⁵). Perhaps not surprisingly, finding pages on

85 innovation required more effort and the reporting on this vital aspect of the companies was not
86 available in a comprehensive manner.

87 With this method we minimalised the total number of pages, to make a fair comparison. We
88 calculated the ratio of the number of pages in the annual report used for innovation to those used
89 for executive remuneration (Innovation Remuneration Index - IRI). Additionally, we evaluated the
90 number of pages used to describe remuneration in comparison with the total number of pages in the
91 annual report and additions. A high IRI implicates that the company reports relatively more about
92 innovation than about remuneration. The higher the IRI, the more pages of the total number are
93 used for remuneration, implicating less focus on other subjects.

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95 **Strong quantitative data about executive remuneration but little about innovation**

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97 Our findings were surprising and are shown in the table. Apparently, one of the most innovative
98 branches of industry, found it in general appropriate to spend as much as 50 pages of dense text on
99 the remuneration of executives, whose salary comprised little more than 0.01% of the sales. The R&D
100 budgets of these companies is between 15 and 20 % of sales and was covered only qualitatively in as
101 little as 4-5 pages. Moreover, variability in the ratio of the two types of reports is large with one
102 company spending 54 pages on remuneration and 1 on innovation and another 38 on innovation and
103 3 on remuneration. None of the companies supplied quantitative information on the cost of
104 innovation. Only 4 of the 15 companies spent more pages on innovation than on remuneration.

105 **Should companies report more detail on cost of innovation?**

106 Innovation is what drives a pharmaceutical company and generates the value for society and its
107 shareholders. An argument against publishing a detailed breakdown of research and development
108 costs would be that it would harm the company by jeopardising its competitive position. However, it
109 could be argued that this may only hold only for a company operating in a perfectly operating market
110 where prices would be optimal by the 'invisible hand' concept of Adam Smith. The sole problem of
111 worldwide access of innovative medicines already demonstrates that this is not the case for
112 medicines. This was perhaps recently poignantly illustrated by the tenfold price differences
113 apparently paid by governments for different Covid19 vaccines. These prices were accidentally
114 revealed by the Belgian Minister of Health, to the irritation of the manufacturers with whom it was
115 agreed by the EU to keep the prices confidential.

116 The cost of innovation is an important component of the price of medication by the industry. No
117 other industry reports such components of its prices in detail. But there it is assumed that the market

118 will do its work and that therefore more information than the price is unnecessary for the consumer.
119 Mobile phones and computers are widely available at reasonable prices, also in low- and middle-
120 income countries, but medicines are not. Additionally, medicines are rarely directly paid by its
121 consumers, who in many cases do not have a choice between different products. These points would
122 argue for a much more extensive transparency of the costs of innovation for the pharmaceutical
123 industry compared to other branches to generate a more ideal market.

124 Some stakeholders probably will argue that such transparency would jeopardise innovation rather
125 than promote it, but we consider this unlikely. There is considerable uncertainty about future
126 sustainability of the current prize level of innovative medicines and price negotiations are generally
127 based on theoretical assumptions of value in quality of life and are difficult to substantiate. A system
128 that is also based upon development cost would introduce the cost of the development as a valid
129 argument. By publishing these costs companies would have an incentive to make development
130 maximally effective and competition would be introduced in a system that has become increasingly
131 operationally heavy and ineffective with trial costs for some large trials exceeding 100M\$. This would
132 benefit investors and reduce development times. Reputationally it would also benefit the industry,
133 by separating the costs of research, from pure development and especially marketing. Cost price
134 transparency would also exactly define the cost of failure-a necessary component of development
135 costs. Such new key performance indicators for the industry would also allow potentials shareholders
136 to invest in the most efficiently operating companies.

137 We put the exquisite detail in which executive compensation is reported in juxtaposition to the
138 apparent lack in transparency of research and development cost to counter the argument that
139 detailed reporting of research and development costs for new medicines would be technically
140 impossible. Apparently, it has been feasible to generate extensive regulation for executive
141 remuneration so there is no reason why this could not be done for research and development costs,
142 which will be readily available from internal cost accounting systems anyway.

143 There are no principal objections against the extensive reporting of remuneration, but we have
144 demonstrated that there is a troubling disbalance in these reports. We question why it is apparently
145 acceptable to report the executive compensation to the level of the private use of a mobile phone,
146 while even the whole extent of the compensation is negligible compared to the sales (and
147 therefore can never affect pricing), while the main component of cost remains at the very high
148 aggregation level of 'research and development'. The disbalance is of course not solved by just
149 reducing the detail of the executive compensation. This would improve our metric, but not the
150 transparency.

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152 **Conclusion**

153 All our medicines contain a very small and very precisely controlled amount of substance, which
154 invariably has a low cost-price. The final cost of a medicine is therefore driven by other factors. The
155 company must be sustainable and able to respond to new situations and this will require sufficient
156 equity so a sustainable profit must be included. The advantages of this were all too obvious in the
157 past period where the presence of technology in industry allowed rapid development of new
158 vaccines. Such a profit must also cover the costs of failure. However, the main cost component of a
159 medicine is information-the scientific facts that support the value-based⁶ use in patients. Whilst we
160 know precisely how the salary of the small number of executives is structured there is no objective
161 information about this important component of the medicines, that we give to our patients.
162 Expanding this information would eventually make medicines cheaper and more readily available and
163 would benefit all stakeholders in this industry.

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167 References

- 168 1. Cutler DM. Are Pharmaceutical Companies Earning Too Much? JAMA - J Am Med Assoc.
169 2020;323(9):829–30.
- 170 2. DiMasi JA, Grabowski HG, Hansen RW. Innovation in the pharmaceutical industry: New
171 estimates of R&D costs. J Health Econ [Internet]. 2016;47:20–33. Available from:
172 <http://dx.doi.org/10.1016/j.jhealeco.2016.01.012>
- 173 3. Mestre-Ferrandiz J, Sussex J, Towse A. The R&D Cost of a New Medicine [Internet]. Office of
174 Health Economics. 2012. Available from: [https://www.ohe.org/publications/rd-cost-new-](https://www.ohe.org/publications/rd-cost-new-medicine%0Ahttp://news.ohe.org/wp-content/uploads/2012/11/RD-Cost-Exec-Sum-+-Contents.pdf)
175 [medicine%0Ahttp://news.ohe.org/wp-content/uploads/2012/11/RD-Cost-Exec-Sum-+-](http://news.ohe.org/wp-content/uploads/2012/11/RD-Cost-Exec-Sum-+-Contents.pdf)
176 [Contents.pdf](http://news.ohe.org/wp-content/uploads/2012/11/RD-Cost-Exec-Sum-+-Contents.pdf)
- 177 4. Wouters OJ, McKee M, Luyten J. Estimated Research and Development Investment Needed to
178 Bring a New Medicine to Market, 2009-2018. JAMA - J Am Med Assoc. 2020;323(9):844–53.
- 179 5. Securities and Exchange Commission. 17 CFR § 229.402 - Executive compensation. CFR US
180 Law. 17CFR Chapter 11 229.402 2009 p. 1–31.
- 181 6. Porter ME. A Strategy for Health Care Reform — Toward a Value-Based System. N Engl J Med
182 [Internet]. 2009;361(2):109–12. Available from:
183 <http://www.nejm.org/doi/abs/10.1056/NEJMp0904131>
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186 Table

187 Data on top 15 pharmaceutical companies ranked by 2019 sales. IRI = Innovation remuneration index.

188 The salary percentage is the CEO remuneration as fraction of total sales.

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Company	CEO Salary (% sales)	Total pages report	Remuneration (pages)	Innovation (pages)	IRI
Johnson & Johnson	0.02	248	54	1	0.02
F. Hoffmann-La Roche Ltd	0.02	158	3	38	12.67
Pfizer Inc	0.03	186	44	26	0.59
Novartis AG	0.03	343	71	26	0.37
Merck & Co Inc	0.06	316	13	21	1.62
Eli Lilly and Co	0.10	187	23	6	0.26
Novo Nordisk As	0.01	117	15	7	0.47
AbbVie Inc	0.06	216	34	4	0.12
Amgen Inc	0.09	277	55	7	0.13
Sanofi	0.02	294	50	21	0.42
GlaxoSmithKline Plc	0.03	316	28	13	0.46
AstraZeneca Plc	0.08	276	23	46	2.00
Gilead Sciences Inc	0.13	241	18	41	2.28
Bristol-Meyers Squibb Co	0.07	226	51	6	0.12
CSL Ltd	0.14	143	15	10	0.67

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194 Figure

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