



AUSTRALIAN DRUG EVALUATION COMMITTEE

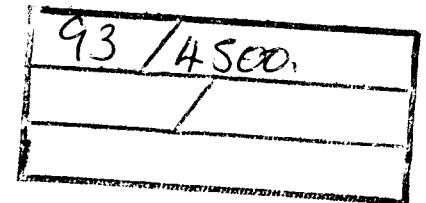
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*All correspondence to be
addressed to THE SECRETARY*

In reply please quote:

File No 92/31918



5790819

Mr G Hones
Trade Practices Commission
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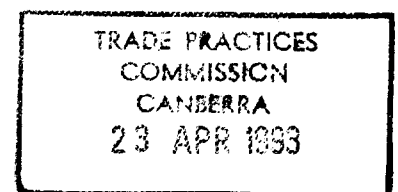
Dear Mr Hones

**RE: APPLICATION FOR AUTHORISATION A90549 BY THE
PROPRIETARY MEDICINES ASSOCIATION OF AUSTRALIA
INC (PMAA): CODE OF PRACTICE**

As requested, I have circulated a copy of the above document to the Members of the Australian Drug Evaluation Committee for comment.

In general, it was considered that the Code of Practice outlined for advertising products was unexceptionable and appropriately upheld the desired ethical standards, by extension of the existing self-regulation imposed by the self-regulatory codes subsumed by the TGAC and the MCA.

In particular, it was of considerable public benefit that the PMMA code would govern advertising in all media to all audiences and that it will require that all claims in advertising be capable of substantiation without delay if a bone fide question is asked.



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Under promotion, Item 6.1.6, unscheduled vitamin and mineral preparations and unscheduled therapeutic goods for external use are exempted from the clause that requires that no members of the PMMA will promote to the general public any prize competition, which is conditional on the purchase of proprietary medicine. It was unclear to the ADEC Members how this exception could be justified given the extent to which vitamins and mineral preparations, in particular, are promoted in pharmacies and in health food stores. The Committee recognised that this is an area of contention, given the strong representations of the so-called Health Industry, when New South Wales moved some years ago to restrict the sales of vitamins and minerals in health stores. Nevertheless, there appeared to be no justification for Item 6.1.6. It was considered that some start should be made in trying to establish a national basis for inappropriate promotion of vitamin and mineral preparations, as well as unscheduled therapeutic goods for external use.

The Committee made no comment in general on the administration of the code or on the complaints procedure.

Yours sincerely



Beverley David
Secretary
ADEC
21 April 1993