

Wyeth

17 - 19 Solent Circuit,
Norwest Business Park
BAULKHAM HILLS NSW 2153
02 9761 8200 tel
02 9023 0000 fax

Locked Bag 5002
BAULKHAM HILLS BC NSW 2153

13 January 2006

FILE No:
DOC:
MARS/PRISM:

Mr Scott Gregson
General Manager, Adjudication
Australian Competition and
Consumer Commission
470 Northbourne Avenue
DICKSON ACT 2602

Dear Mr Gregson

Re: Application for revocation and substitution (A90994-6) lodged by Medicines Australia Inc

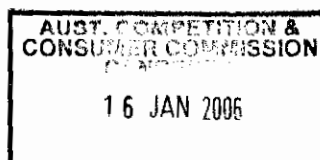
Industry self-regulation with continued refinements to the Code of Conduct represents a set of guidelines developed by industry. The Code is aimed at enhancing the quality use of medicines and protecting public health, whilst at the same time maintaining a competitive market place. Over considerable time the Code has proven to be vitally important to the prescription medicines industry in the efficient and effective regulation of marketing medicines.

The Code of Conduct was developed voluntarily by the APMA (now Medicines Australia) in 1960. It has been reviewed every three years since, and is now well recognised as leading international standards with respect to effective, ethical industry self-regulation.

An integral part of the Code's success is that compliance with the Code is a condition of membership of Medicines Australia and members must therefore observe both the spirit and the letter of the Code. The fact that Medicines Australia enjoys membership from the majority of the pharmaceutical industry adds considerable weight to the Code.

The changes outlined in the Medicines Australia Submission¹ regarding the 15th edition of the Code of Conduct include:

- Provision of balancing risk information on all printed promotional material, in addition to being accompanied by full or abridged Product Information.
- Direction to prohibit advertisements in sections of electronic prescribing software designed to be shown by doctors to their patients.
- New guidance on relationships with healthcare professionals acting as company consultants, requiring documentation of legitimate business rationale.



¹ Medicines Australia Submission accompanying application for authorisation of the 15th edition of the Medicines Australia Code of Conduct 30 November 2005

Page 2

In conclusion, Wyeth support these changes believing that they balance the requirements for competition and consumer protection embodied in the Trade Practices Act and the Therapeutic Goods Act, and recommend certification of edition 15 of the Code by the ACCC.

Yours sincerely

A handwritten signature in black ink that reads "Robert Landry". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Robert Landry
Finance & Administration Director