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ABN 47 702 595 758

From Fiona Crosbie / Emma Marsh

Deutsche Bank Place
Corner Hunter and Phillip Streets
Sydney NSW 2000
Australia
Tel 61 2 9230 4000
Fax 61 2 9230 5333

To **Scott Gregson**, General Manager, Adjudication Branch,
Australian Competition and Consumer Commission

Email scott.gregson@accc.gov.au

Correspondence
GPO Box 50
Sydney NSW 2001
Australia
DX 105 Sydney

www.aar.com.au

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Dear Mr Gregson

Medicines Australia

Applications for revocation and substitution

Further to your letter of 21 July 2006, Medicines Australia (**MA**) wishes to propose to the Commission a revised table for reporting on the Monitoring Committee's review of educational meetings sponsored by pharmaceutical companies, which differs only slightly from the table proposed in your letter of 7 June 2006. MA's proposed revised table is attached.

MA considers that the revised table addresses the concerns expressed by the Commission to increase the level of transparency surrounding these meetings and to promote confidence in relation to the effectiveness of the enforcement of the MA Code of Conduct. MA submits that the revised table provides information on the actual benefit provided to each attendee at an educational meeting, and therefore facilitates the evaluation of the balance between education and associated hospitality provided at such events.

You will note that MA proposes to include information on the duration of the educational component provided at each event. As we discussed with you and Commissioner McNeill on 6 July 2006, MA considers that it is important for the public to have access to information about the education that has been provided rather than to focus on the cost of any co-incidental hospitality. This information would be provided in place of the "type of function" and "nature of function" as proposed in your letter of 7 June 2006. In our letter of 28 June 2006 we explained the difficulty in defining a type of function and the nature of a function and the overlap between the different terms proposed by the Commission. MA submits that its alternative proposal for the table to include information on the duration of the education will still give an appropriate indication of the nature of the meeting, such

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as whether it was a short presentation over lunch or a weekend symposium, and therefore achieve the same result as the Commission's proposal.

You will also note that MA proposes that the total cost of the function to the company not be included. The rationale for providing information about company-sponsored educational meetings is to offer greater transparency about any benefits provided to healthcare professionals. However, MA submits that the cost of the venue hire is not a benefit to healthcare professionals but is an incidental cost to the sponsor of providing the education. Further, the cost of the hire of a venue varies significantly. Some venues do not charge for use of a meeting room; where venue hire is charged there is large variability especially between city and rural locations. Therefore, MA submits that inclusion of venue hire cost would not provide useful information on which to make comparison between different events. MA also proposes not to require disclosure of speakers' fees. An honorarium or fee paid to a speaker is not a benefit to the healthcare professionals attending an educational meeting. Further, the fee paid to a speaker is part of the contractual arrangements between the pharmaceutical company and the speaker and would therefore be confidential information. In addition, identifying a speaker's remuneration, in combination with the other information that will be included in the table, might allow individual speakers to be identified. This might give rise to privacy concerns, as explained in our discussions with you and Commissioner McNeill.

As described in our letter of 28 June 2006, the collection and reporting of this information will pose a significant administrative burden, both on MA member companies and the MA Secretariat. MA therefore urges the Commission not to extend the reporting period as suggested in your letter of 21 July 2006.

We understand that the Commission is likely to issue its Final Determination very shortly. MA hopes that the revised table will be accepted by the Commission. It represents a significant movement on the part of MA to accommodate the Commission's concerns.

Please do not hesitate to contact us if you require clarification in respect of any of the above.

Yours sincerely

Fiona Crosbie
Partner
Fiona.Crosbie@aar.com.au
Tel 61 2 9230 4383

Emma Marsh
Senior Associate
Emma.Marsh@aar.com.au
Tel 61 2 9230 4136



SUMMARY OF EDUCATIONAL EVENTS SPONSORED BY MEMBER COMPANIES

Company Name:

Reporting period:

Date held (month and year)	Venue	Professional status of attendees	Duration of educational content delivered	Hospitality provided by the company	Entertainment provided by the company	Number of attendees	Total Cost of hospitality provided
mm/yyyy	Name and city/town	For example: GPs, specialists, pharmacists, nurses, allied health professional (which would include physiotherapist s, occupational therapists, dieticians)	xx hours	Specify all meals or refreshments provided: breakfast, light refreshment, morning tea, lunch, afternoon tea, dinner Specify whether alcoholic beverages were offered and/or accommodation provided for attendees	Yes/no And if yes, specify the nature of the entertainment	Number of people who attended the event	Cost per head, excluding cost incurred for delegates who accepted but did not attend. This should include the cost of all items listed under "Hospitality provided".