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Our Ref: Aug09\_Medicines Code of Aust

Ms Joanne Palisi  
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Adjudication Branch  
Australian Competition & Consumer Commission  
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**CANBERRA ACT 2601**

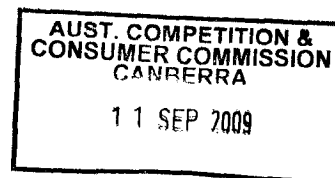
Dear Ms Palisi

Thank you for the opportunity to comment on the applications for authorisation (A91183 & A91184) for the Medicines Australia Code of Conduct Edition 16. Queensland Health (QH) is supportive of this minimum set of standards that provide for ethical and transparent processes for the promotion of prescription products through a self-regulatory approach.

In particular, QH notes that in the revised Code higher standards will apply in the promotion of prescription medicines and in particular for:

- Medical and promotional claims, including the availability, content and appropriateness of supporting data for those claims;
- Content and format of promotional material;
- Promotional material directed at healthcare professionals, including:
  - limitation of brand recognition/ brand name reminders to items related to the practice of medicine or pharmacy
  - banning of advertising within prescribing software
- Inclusion of clauses relating to the newer social network sites (eg Facebook, Twitter etc and other electronic media and the extension of advertising limitations to such sites where the public has access;
- Clarification that provision of benefits by companies to healthcare professionals is inclusive of research and clinical trials scenarios;
- Increased training for company representatives regarding the Code and Australian Trade Practices and Privacy legislation;
- Increased fines for breaches of the Code;
- Additional consumer representation on relevant committees for the Code, Appeals and Monitoring;

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- Company support and involvement in activities with healthcare professionals (by financial or other means including hospitality) to be able to successfully withstand public and professional scrutiny, and conform to professional and community standards of ethics and good taste; and
- Increased transparency and documentation of relationships between pharmaceutical companies and consumer health organisations.

Queensland Health supports the notion that interactions with healthcare professionals must have the primary objective of enhancing medical knowledge and improving the quality use of medicines in Australia, and believes that the proposed enhancements to the code support this.

Yours sincerely



Professor Andrew Wilson  
**Deputy Director-General**  
**Policy, Planning and Resourcing**

8/9/2009