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15 April 2009

Dr Richard Chadwick  
General Manager  
Adjudication Branch  
Australian Competition and Consumer Commission  
GPO Box 3131  
CANBERRA ACT 2601

Dear Dr Chadwick

**Generic Medicines Industry Association application for Code of Practice Authorisation**

Thank you for your letter of 7 April 2010 in which you invite the Guild to comment on the application from the Generic Medicines Industry Association (GMiA) for authorisation of its Code of Conduct (2<sup>nd</sup> edition).

The Guild welcomes GMiA's intention to issue a second edition of its Code of Practice.

With regard to the specific questions on which you have sought our views:

1. *How will the Code be effective in monitoring and regulating the conduct of GMiA member companies?*

Introduction of a Code of Conduct by GMiA is a significant step forward for the Association, building as it does on the 'Significant Operating Principles' initially drafted in 2005. This initiative will bring GMiA member companies more into line with the member companies of Medicines Australia which has had a Code of Conduct for many years. The Guild sees no reason why the GMiA Code will not be effective in monitoring and regulating the conduct of GMiA companies.

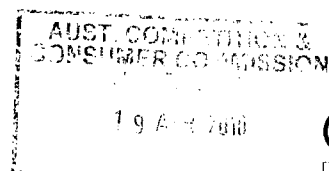
2. *What are the public benefits likely to flow from granting authorisation to the Code?*

There are several public benefits to flow from granting authorisation to the Code:

- Commitment of GMiA members to a system of best practice self regulation
- Commitment of GMiA members to the ethical supply of generic medicines to the Australian community in compliance with applicable laws and standards
- Introduction of internal and external complaints handling systems, educational event guidelines and reporting requirements
- Establishment of an independent disciplinary Code Complaints Committee

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3. *What is the detriment to competition and/or the public resulting from the Code?*

The Guild does not believe any detriment to competition and/or the public will result from the Code.

Yours sincerely

A handwritten signature in cursive script that reads "Wendy Phillips".

**Wendy Phillips**  
*Executive Director*