

Chief Executive Officer: Bryan Stevens
ABN 49 008 532 072

29 April 2010

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

Dear Dr Chadwick,

RE: Generic Medicines Industry Association Pty Ltd (GMiA) application for authorisation

The Pharmaceutical Society of Australia (PSA) is responding to the invitation to comment on GMiA's application for authorisation for the 2nd edition of its Code of Practice (Code).

PSA is the peak professional organisation representing some 75 per cent of pharmacists across Australia. PSA's core functions are: supporting pharmacists' commitment to high standards of patient care; providing continuing professional development, education and practice support; and representing their role as frontline health professionals.

PSA provided comments to GMiA during the development of the Code with a view to clarifying and strengthening its content and to ensure that the operation of the Code would be acceptable to the pharmacy profession. This was important as the primary goal of GMiA members is to support and influence the decision-making of pharmacists when dispensing. This contrasts with the goal of the Medicines Australia Code of Conduct and its members where the greatest impact is on prescriber decision-making.

PSA has previously supported authorisation of the Medicines Australia Code of Conduct and we believe it is appropriate for there to be a complementary but separate code for the generic medicines industry sector.

PSA believes the operation of the Code will have minimal detriment to competition and to the public and therefore has no objections to it being authorised.

Please contact me if PSA can assist further in this matter.

Yours sincerely,



Bryan Stevens
Chief Executive Officer