



The Royal Australasian
College of Physicians

Friday, 20 August 2010

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

Dear Mr Chadwick,

**Re: Generic Medicines Industry Association (GMiA) Code of Practice 2nd Edition –
draft determination A91218-A91219**

Thank you for inviting the Royal Australasian College of Physicians (RACP) to respond to the Australian Competition & Consumer Commission's request to provide a submission on GMiA's Code of Practice 2nd edition.

The College in 28 April 2010 made a list of suggestions to the Australian Competition and Consumer Commission (ACCC) with regards to suggested changes to the Code. The purpose of the current response is to grant conditional approval to the second edition of the Generic Medicines Industry Association's Code of Practice. The College understands that the Code is intended to provide a self-regulatory framework to govern the relationship between generic pharmaceutical companies and healthcare professionals.

In this regard the College would like the ACCC to ensure that the GMIA provide greater transparency around the relationship between the manufacturers of generic medicines and pharmacists. This could be achieved by extending the public reporting requirements in the Code, which currently only applies to the hospitality and entertainment provided at educational events for medical practitioners, to also apply to events for pharmacists.

The College would also like to suggest that a second proposed condition is designed to provide high level disclosure around the nature and value of the gifts and other non-price incentives provided by manufacturers to pharmacists as an incentive for the pharmacist to stock their brand of product.

If you require any further clarification of the endorsement please contact Ms Mary Osborn by email on mary.osborn@racp.edu.au.

Yours sincerely

Mary Osborn
Senior Policy Officer