

26 July 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 (GMiA) Code of Practice 2<sup>nd</sup> Edition – Application for authorisation A91218-A91219**

Thank you for inviting NPS to comment on GMiA's application for authorisation of its *Code of Practice 2<sup>nd</sup> edition*.

NPS is very pleased that GMiA has decided to adopt a code of conduct, and especially that there is commitment to quality use of medicines articulated within the draft code.

However, we support the view expressed by the Australian Medical Association, Consumers Health Forum, and the Royal Australian College of Physicians that the GMiA Code should be strengthened to include a requirement to report educational events for dispensing health professionals.

Practices that support preferential dispensing of a particular brand should be discouraged through strengthening the specificity of the code in relation to conflicts of interest.

Consumers need to understand their medicines choices, and undue influence on dispensing health professionals may limit or restrict consumer choice, leading to confusion or misunderstanding.

We are also of the view that improved parity between the codes of conduct for both GMiA and Medicines Australia members is necessary to ensure a level playing field.

Thank you for the opportunity to comment. If you have any questions please contact Kerren Hosking, Manager Corporate Affairs & Strategy on (02) 8217 8796 or email [khosking@nps.org.au](mailto:khosking@nps.org.au).

Yours sincerely



Dr Lynn Weekes  
Chief Executive Officer