



30 July 2012

The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

Dear Sir/Madam

**Medicines Australia Limited application for revocation and substitution
A91316-A91320 – interested party consultation (Roche Products Pty Limited)**

Thank you for allowing us the opportunity to comment on Medicines Australia's application for revocation of the Code of Conduct. We would like to express our endorsement of the Code and provide some additional comments around the transparency initiatives within the Code of Conduct. We appreciate these new initiatives will generate much interest and possible debate within the community.

Roche is proud to support activities that enhance medical knowledge, improve the quality use of medicines and conform to community standards that benefit public health and/or patients. Our company supports the move towards greater transparency within the pharmaceutical industry, including the disclosure of aggregate support to institutions and doctors, and the disclosure of individual support to health consumer organisations.

Roche recognises that, at this time, there are a number of privacy, legal and security concerns around disclosing the details of support which individual healthcare professionals receive. Given that healthcare professionals may receive support from a number of sources, Roche would like to see measures put in place to ensure consistency and accountability of reporting by both industry and individual healthcare professionals. These concerns must be addressed with all the relevant stakeholders before individual disclosure occurs. Transparency will only work when there is disclosure from all parties and not those limited to only the pharmaceutical industry.

Roche supports the development of a stakeholder working group to develop further transparency measures to ensure the disclosure is done in an appropriate and consistent manner. The formation of a working group ensures that all possible models are assessed and the right option for Australian stakeholders implemented. It is important that all stakeholders evaluate the various models available nationally and globally to consider the benefits and challenges of each.

In summary, Roche supports MA's application for revocation and substitution of the Medicines Australia Code of Conduct. Furthermore, Roche continues to support the move towards greater transparency provided it is conducted in an appropriate and consistent manner, where all stakeholders are aligned. Full disclosure must be embraced by individual healthcare professionals and industry alike and until this alignment can take place, Roche's position is aligned with those recommended in Medicines Australia's application, namely, de-identified (aggregate) reporting.

Thank you again for the opportunity to comment.

Yours sincerely
Roche Products Pty Limited

A handwritten signature in blue ink, appearing to read "Aaron Guttmann". The signature is fluid and cursive, with a large loop at the end.

Mr Aaron Guttmann
Commercial Compliance Manager