

Blanch, Belinda

From: Richard Charles O'Brien
Sent: Thursday, 20 November 2014 3:07 PM
To: Adjudication
Subject: Medicines Australia Limited - Revocation and Substitution - A91436 - A91440

Dear Sir/Madam,

Re. Medicines Australia Limited - Revocation and Substitution - A91436 – A91440 Draft determination.
I wish to make a submission in relation to the draft determination.

1. I agree with the draft determination in relation to making financial disclosure compulsory. Voluntary disclosure will not be effective and health care professionals should not perform work for the pharmaceutical industry if they are not prepared to reveal their financial arrangements.
2. Financial disclosure rules should be consistent with those of our federal politicians. That is, all gifts or financial dealings over \$300 should be reported. To require reporting of lower amounts creates an unreasonable paperwork burden. Health care professionals should not be subject to stricter guidelines than our elected representatives.
3. Specific financial restrictions become obsolete with full disclosure and should be removed. These include items such as the prohibition of business class travel for all domestic flights, limiting prices of meals, etc. These restrictions are clearly designed to reduce costs of the members of medicines Australia. In my opinion, by allowing these restrictions to remain, the ACCC is essentially sanctioning anti-competitive behaviour by allowing competitors to agree to limit spending on customers.

Yours sincerely,

Assoc. Prof. Richard O'Brien

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