

Pfitzner, Laura

From: Chris Del Mar <cdelmar@bond.edu.au>
Sent: Monday, 9 February 2015 10:09 AM
To: Adjudication
Subject: RE: Medicines Australia Limited - Revocation and Substitution - A91436 - A91440 - consultation on proposed conditions of authorisation [SEC=UNCLASSIFIED]

Dear Tess,

Medicines Australia Limited application for revocation of authorisations A91316-A91320 and substitution of new authorisations A91436-A91440 – proposed conditions of authorisation

I fully support the ACCC's approach to the proposed conditions of authorisation for the Medicines Australia Code. The provisions deleting the consent requirement and replacing that with giving notice of the disclosure obligation to health care professionals accepting transfers of value is an important improvement in the transparency arrangements. The ACCC is generous in offering Medicines Australia until 1 Oct 2016 to implement the new regime. I do not object to this.

It is good that the ACCC will require member companies to report, in a standard publicly accessible form, the individual transparency data from the time of implementation, and that this information should be kept accessible for a period of three years. Also that the ACCC's expectation that Medicines Australia move to providing a centralised database for this transparency data soon. The \$120 per meal allowance or cap being retained rather than an individual reporting of food and beverage amounts being required (subject to the additional compliance safeguards requested by ACCC) seems reasonable.

I am happy for my comments to be made public on the ACCC's website.

Yours sincerely,

Chris
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