

Pfizer, Laura

From: Philip Morris
Sent: Sunday, 8 February 2015 11:48 PM
To: Macrae, Tess
Subject: ACCC Medicines Australia authorisation

8 Feb 2015
Tess Macrae
ACCC

Dear Tess, regarding:

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

I wish to commend the ACCC for the balanced approach to the proposed conditions of authorisation for the Medicines Australia Code. I think 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. I think the ACCC is being generous in giving Medicines Australia until 1 Oct 2016 to implement the transparency regime. However, I do not object to this extension. I am pleased 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. I endorse the ACCC expectation that Medicines Australia move to providing a centralised database for this transparency data in a timely matter. I agree with 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).

Please pass these remarks on to the ACCC commissioners. I have no objection to my comments being published on the ACCC website.

Yours sincerely,

Prof Philip Morris.