

February 2015

Rami Greiss
Executive General Manager
Merger and Authorisation Review Division
Australian Competition and Consumer Commission
Adjudication@accc.gov.au
GPO Box 3131
Canberra ACT 2601

Dear Mr Rami Greiss,

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

Reference: 1.3.8.3

The Australian Society of Anaesthetists (ASA) is the peak representative body for the medical specialty of Anaesthesia in Australia. The ASA has a diverse membership of 3000 anaesthetists. We come from both metropolitan and non-metropolitan areas as well as public, private and blended public/private practices.

In responding to the request for comment from the Australian Competition and Consumer Commission (ACCC) on the conditions of authorisation it proposed to impose on any authorisation of edition 18 of Medicines Australia Limited's (Medicines Australia) Code of Conduct, we advise as follows:

1. The ASA is agreeable to requiring Medicines Australia companies not to enter into reportable financial relationships with health practitioners unless consent to publish information about the relationship is given.
2. The ASA supports deferral until 1 October 2016 to better allow health practitioners to address the new Code.
3. The ASA supports the proposal that data collected by companies is reported in a standard template with an 'identical accessible format' with information to be available only for the purposes of a patient seeking information about specific practitioners. We do not support reporting of total monies paid.
4. The ASA agrees that information on individual payments be retained for three years.
5. The ASA suggests that from a practical perspective some minor amendments may be necessary over the life of the Code given that the Code imposes new and untested requirements.

Thank you for the opportunity to comment.

Yours sincerely,



Dr James Bradley
Chair
Professional Issues Advisory Committee
Australian Society of Anaesthetists

~~This document is confidential material of the Australian Society of Anaesthetists and is not to be further distributed, published or broadcast without the express permission of the Company Secretary.~~

t 02 8556 9700 | f 02 8556 9750 | asa@asa.org.au | www.asa.org.au | ABN 16 095 377 370
PO Box 6278, North Sydney, NSW 2059