

20 February 2015

Australian Competition & Consumer Commission
adjudication@accc.gov.au

Re: A91436-A91440 – Medicines Australia Limited - submission

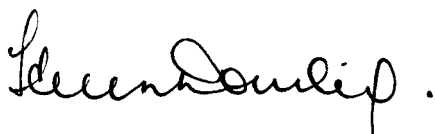
The Society of Hospital Pharmacists of Australia (SHPA) is the national professional organisation for over 3,000 pharmacists, pharmacists in training, pharmacy technicians and associates working across Australia's health system. SHPA is the only professional pharmacy organisation with a strong base of members practising in public and private hospitals and other health service facilities.

SHPA has no objection to the ACCC's removal of the condition which requires members of Medicines Australia to obtain the consent of the healthcare professional to the disclosure of information, prior to the transfer of value. As long as members of Medicines Australia take appropriate steps to give notice of the disclosure obligation prior to the transfer of value, such that the healthcare professional would reasonably expect disclosure, then we would expect that consent has reasonably been established.

SHPA acknowledges that the Medicines Australia's Code of Conduct is only applicable to members of Medicines Australia however we would strongly support the broader application of aspects of the Code, in particular the transparency model, across all companies that manufacture or sponsor any medicines registered or listed in Australia.

If you would like to discuss the issues raised in this submission or require further information, please contact Jerry Yik (jyik@shpa.org.au or 03 9486 0177)

Yours sincerely



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The Society of Hospital Pharmacists of Australia

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