

**Cancer Voices Australia**

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cancer voices **australia**

Australian Competition & Consumer Commission  
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Dear Commissioners

**CVA Comment on ACCC Draft Determination in respect of the  
Medicines Australia Code of Conduct edition 18**

Cancer Voices Australia (CVA) thanks the ACCC for this opportunity to comment on its Draft Determination in respect of the Medicines Australia Code of Conduct edition 18.

We continue to hold the views we made to both Medicines Australia directly and to the ACCC earlier this year. Those submissions are attached for your reference.

In addition, we make the following points. We also look forward to participating in the conference to discuss this draft determination.

**Reporting requirements of pharmaceutical companies regarding their interactions with  
healthcare professionals**

CVA strongly agrees with the ACCC that such reporting only works if it is fulsome and not optional. To make it optional would, from a patient/consumer perspective, render the entire regime worthless. That is, without this, we don't see the point of proceeding at all as it makes no improvement on the current highly flawed situation.

CVA represents all Australians with cancer, their families and carers. Therefore we are aware of the community view on such matters. It is clear to us the community expects such matters to be disclosed, without exception, and certainly without the need of the consent of each individual healthcare professional. What is being proposed here ie compulsory disclosure, is a regime that exists in for example the political sphere and we think it is equally important here.

**Coverage**

We reiterate that relevant drug names should be included in the reporting. Without a link of some kind to a drug name, it will be difficult for a consumer/patient to understand the information or to recognise its potential relevance.

If the purpose of disclosure is to be open and transparent about relationships between healthcare professionals and pharmaceutical companies, then whether a healthcare consumer can truly access and understand this information is highly important. This goes to both the form and content of the disclosure.

As most patients/consumers will be familiar with drug names rather than company or other names, it is important the information be accessible in this way by patients. The complexity added to the reporting regime will not be so great as to be overly burdensome compared to the utility and transparency in doing so. We are confident it is possible to provide a way to search by drug or practitioner name in a way that it can be accessed by patients/consumers. We would be pleased to assist in developing such a system. We also agree with the ACCC that this information needs to be in the most accessible format possible, if it is to be of use.

We repeat our view that gifts etc to small practices are most often akin to a gift etc to an individual practitioner and should be treated as such.

We also agree that provision of meals should be enclosed as we agree this can be a significant benefit to a practitioner.

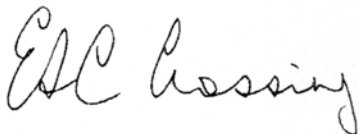
We stand by our comments that the delay in provision of the information, as proposed by Medicines Australia, means its value will have reduced dramatically. A consumer should not have to wait ten months for "transparency". At that point, it is likely to be no longer relevant and so worthless.

#### **Health consumer organisations**

CVA agrees that it is important to maintain transparency and reporting regarding support provided to health consumer organisations. Such relationships raise exactly the same issues as relationships between pharmaceutical companies and healthcare professionals and the information should be freely available and accessible to all.

Thanks you again for the opportunity to provide the view of the many, many Australians with cancer, their families and carers.

Yours sincerely



**Sally Crossing AM**

6 November 2014

Cancer Voices Australia is the independent, 100% volunteer voice of people affected by cancer, working to improve the cancer experience for Australians, their families and friends. We are active in the areas around diagnosis, information, treatment, research, support, care, survivorship and policy. To achieve this we work with decision-makers, ensuring the patient perspective is heard.

Cancer Voices has led the cancer consumer movement in Australia since 2000. The CVA network works together on national issues identified as important by their members, with consumers working to help others affected by cancer.

