



Revision of SAPI Code SAPI Marketing Practices Committee

The Singapore Association of Pharmaceutical Industries (SAPI) has recently updated its Code of Marketing Practices in August 2010.

Introduction

The SAPI Code of Marketing Practices is a set of ethical standards for local pharmaceutical companies. Its objective is to provide guidance for proper conduct in the marketing and promotion of medicinal products, and to serve as the basis for self-discipline within the local pharmaceutical industry.

The scope of the Code includes any activity undertaken by a company or by distributors that promote the prescription, supply, sale, or distribution of pharmaceutical products (including vaccines). Acceptance and adherence to the Code is mandatory for membership with SAPI.

What's New

The objective of the revised Code is to provide clearer guidance in disseminating accurate, fair and objective information to the medical and allied profession. It is also intended to contribute to the promotion of propriety and transparency in the areas of medical meetings, gifts, hospitality and sponsorships for physicians.

Key Changes (effective August 2010) at a Glance :

- 1) Items of medical utility that are related to patient care are permissible for distribution to physicians, subject to a limit of \$200/item;
- 2) Biomedical books or journal subscriptions are permissible for physicians, subject to a limit of \$500/year for personal and \$1000/year for institutional subscriptions;
- 3) Venues for medical meetings and continuing medical educations must not be renowned or extravagant, and must be able to withstand public and professional scrutiny. Venues associated with gambling, gaming or entertainment are deemed inappropriate;
- 4) Any activities with an element of chance should not be part of symposia/exhibition.

More details on specific sections of the Code is provided below :

- Section 3 : General Principles of Promotion
- Section 5 : Meetings & Hospitality
- Section 6 : Gifts, Donations & Grants

Section 3 – General Principles of Promotion

What is considered Acceptable Standards of Promotion?

Promotional material for pharmaceutical products should be accurate, fair and objective and conform to legal requirements, high ethical standards, good taste and only be for approved products and indications. Claims should not be stronger than scientific evidence warrants and should avoid ambiguity.

In addition, promotional materials should ensure that:

- Data are substantiated;
- False or misleading claims are not allowed;
- New products are clearly identified;
- Comparative statements must be used carefully;
- Imitation that may give rise to confusion is not allowed.

Is Internal Review/Approval of Promotional items Necessary?

Promotional communications have to be signed off by a person with appropriate scientific or healthcare qualifications. In addition, companies should have in place procedures to review and monitor all of their promotional activities and materials.

What type of Scientific Evidence may be included in Promotional Materials?

Scientific information in promotional materials should be based on current valid scientific evidence and should not give an incorrect or misleading impression. Companies should produce data, on request, to support claims, whether or not the data are in the public domain, including data marked as 'data on file' but are not required to substantiate indications for use which are already approved by Health Sciences Authority, Singapore.

Data from in vitro and animal tests should be clearly marked and all-embracing claims, or superlatives (e.g. 'the best antihypertensive agent') should not be used without qualification.

How much Safety Data should Companies Communicate?

Essential information pertaining to pharmaceutical products' safety, for example, contraindications, precautions and side effects should be appropriately and consistently communicated. The word "safe" should not be used without qualification and only if substantiated by published clinical data.

In What Manner Should Communications to the Public be Carried Out?

Communications to the public may include the provision of patient package inserts and other leaflets and booklets, etc., made available to inform patients about products prescribed or recommended by health professionals.

Pharmaceutical companies should not respond to requests from members of the public for product information or advice on personal medical matters. For such requests, the inquirer should be redirected to consult his/her own doctor.

Section 5 – Meetings & Hospitality

Can Company Representatives provide Lunch for Doctors?

Providing hospitality in relation to food and drinks as per social/cultural norms should be limited to <\$100/person (excludes GST and service charge). This should be accompanied by dissemination of scientific or educational information.

Can Companies Sponsor or Hold Medical Meetings at the Integrated Resorts or Jockey/Horse-racing Clubs?

Companies should avoid holding meetings at renowned or extravagant venues. The choice of venue must be able to successfully withstand public and professional scrutiny and conform to professional and community standards of ethics and good taste.

Venues associated with activities such as gambling, gaming or entertainment are deemed not conducive to the conduct of scientific/educational meetings/activities and would be deemed as inappropriate.

Can Doctors be Sponsored to Attend Overseas Medical Meetings?

Provisions of sponsorship to physicians to attend overseas meetings are allowed as long as scientific objectives remain the principal focus of such overseas trips.

Such overseas medical meetings must have participants from 2 or more different countries (excluding the country of origin of the speakers). If the majority of the participants are local physicians, the event should be held in Singapore.

Any support to individual physicians to participate should not be conditional upon any obligation to prescribe, recommend or promote any products.

Are Post-meeting Entertainment Programmes Allowed?

The scientific program should always be the main focus and attraction of such overseas meetings. Entertainment or other hospitality and any gifts offered should be secondary to the main purpose of the meeting, and should be kept to a modest level.

As a general rule, scientific content must be at least 75% of the total programme time.

No standalone entertainment, recreational or social activities is allowed.

Are Lucky Draws Allowed at Medical Meetings?

Lotteries/lucky draws, and any other activities with an element of chance (with no efforts involved), should not be part of the medical symposia/exhibitions.

Can Companies Provide Business Class tickets for Air Travels?

Pharmaceutical companies are to provide only Economy Class tickets for air travel of less than 6 hours.

Can Doctors be Accompanied by their Spouses?

Companies should not pay travel costs of persons accompanying invited members of the medical and allied professions. Hospitality also should not extend beyond members of the professions.

Invitations to meetings should not be extended to spouses unless they themselves are practising members of the medical or allied professions.

Section 6 : Gifts, Donations & Grants

What types of Gifts are Permissible?

Promotional items of nominal value (not exceeding \$20 per unit) are permissible as long as they are related to the physician's work and/or entail a benefit to patients.

Gifts should not be contingent on increased prescribing. No gifts or financial inducement shall be offered or given to members of the medical and allied professions for the purpose of sales promotion.

Are Educational Gifts such as Medical Textbooks allowed?

Text or reference books/information, and other educational materials, may be given to physicians if they serve a genuine educational function.

Can Companies provide Unrestricted Donations or Grants?

Companies may provide donations to requests, strictly for charitable purposes and charitable organisations. In addition companies can provide grants towards financial support strictly for educational programs, (including but not limited to request to fund accredited CME programmes, non-accredited educational programmes, fellowships, advocacy organisations, societies, medical conferences, congresses or independent meetings) if they are:

- unsolicited;
- from an institution or organisation, not an individual healthcare practitioner;
- unrelated to the prescribing, purchasing, registration of any products;
- substantiated by written documentation of details of programme;
- able to withstand public scrutiny.

For more information on the SAPI Code, visit the SAPI website at <http://www.sapi.org.sg>. Physicians can also request for a free copy of the Code from the SAPI secretariat at tel: 6738 0966. **SMA**