

By SAPI Marketing Practices Committee

SAPI Guidelines on Communications – Pre-Registration and to the Public

This is the third in a series of articles on the revised SAPI (Singapore Association of Pharmaceutical Industries) **Code of Marketing Practices**. The first article appeared in the October 2004 issue of *SMA News* and provided an overview of the recent key revisions to the Code. The next few articles will elaborate on specific sections of the Code bearing greater relevance to physician-pharmaceutical company interaction, which started with the article on **Sponsorships, Gifts and Hospitality**, published in the July 2005 issue of *SMA News*.

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.

COMMUNICATIONS – PRE-REGISTRATION

Section 3.8 entitled ‘Pre-Registration Communications’ provides industry guidance in the area of communications on products, which are not yet being registered and approved in Singapore.

Can products be promoted before registration and approval?

No pharmaceutical product shall be promoted for use in Singapore until the requisite approval for marketing for such use has been given by Health Sciences Authority (HSA), Singapore.

However, please note that this provision is NOT intended:

1. to abridge the right of the scientific community and the public to be fully informed concerning scientific and medical progress;
2. to restrict a full and proper exchange of scientific information concerning a pharmaceutical product, including appropriate dissemination of investigational

- findings in scientific or lay communications with media and at scientific conferences; or
3. to restrict public disclosure to stakeholders and others concerning any pharmaceutical product as may be required or desirable under law, rule or regulation.

Does the above apply to international meetings?

At international meetings, where a significant proportion of attendees are not from the venue country, advertising of locally unapproved products may occur, provided it is legally acceptable in the venue country and in the participant’s local code of practice.

When such advertising is undertaken, all materials used should bear a disclaimer which clearly states that the product is not locally approved.

COMMUNICATIONS – TO THE PUBLIC

Section 3.9 entitled ‘Communications to the Public’ provides industry guidance on how pharmaceutical companies should communicate to the lay public in order to assume fair and unbiased positions.

In what manner should communications to the public be carried out?

Where it is permitted by law to communicate directly with patients regarding their prescription medicines, all such information should be accurate, fair and not misleading.

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

What rules and regulations are to be observed during public activities?

In this day and age, growing demand of society for more information, as well as enhanced public understanding of disease prevention, signs and symptoms of medical conditions, illnesses and available treatments are seen.

SAPI has worked together with HSA in establishing a set of guidelines on Disease Awareness Campaigns (DAC) to ensure that such public activities serve their intents and purposes, which are to raise disease awareness and provide generic health educational information on disease and its management in a factual, fair, balanced and up-to-date manner.

While pharmaceutical companies are encouraged to assist in the conduct of public/patient disease awareness programmes, activities should adhere to the highest standards of accuracy and support the role of the healthcare provider. Such activities could be organised

under the auspices of appropriate medical bodies/societies.

In any case, pharmaceutical companies should not attempt to respond to requests from individual members of the public for information or advice on personal medical matters, including about the product which has been prescribed. All such requests should be redirected and the inquirer recommended to consult his or her own doctor. ■

**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.**